

Company Name Amazon
Industry Agricultural, Apparel & ICT Products (Supply Chain only)
Overall Score 15.1 out of 100

Theme Score	Out of	For Theme
1.9	10	A. Governance and Policies
3.5	25	B. Embedding Respect and Human Rights Due Diligence
2.0	20	C. Remedies and Grievance Mechanisms
4.7	25	D. Performance: Company Human Rights Practices
3.0	20	E. Performance: Responses to Serious Allegations

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 2022 Methodology document for the sector concerned. 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	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Universal Declaration of Human rights (UDHR): The Global human Rights policy states that 'Our approach on human rights is informed by international standards; we respect and support the Core Conventions of the International Labour Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights'. [Global Human Rights Principles (website), N/A: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to the UNGPs: The Global Human Rights Policy states that it 'recognizes our responsibility to respect and uphold internationally recognized human rights through the ethical treatment of our workforce and those within our value chain. Guided by the United Nations Guiding Principles on Business and Human Rights, we commit to embedding respect for human rights throughout our business'. The Company refers to the supply chain standards, which 'are derived from the United Nations Guiding Principles'. However, 'to be guided by' or 'derived from' are not considered a formal statement of commitment following CHRB wording criteria. Also, the statement of the supply chain standards refers to the UNGPs guided those standards (for suppliers). The Company has provided additional sources to CHRB regarding this indicator. However, only policy documents are considered suitable sources for this indicator under CHRB revised approach. [Global Human Rights Principles (website), N/A: sustainability.aboutamazon.com] & [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: Commitment to the OECD Guidelines for Multinational Enterprises
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	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"> • Met: Company has a commitment to the ILO Core: The Company states in its Global Human Rights Policy: '[...] we respect and support the Core Conventions of the International Labour Organization (ILO), the ILO Declaration on Fundamental Principles and Rights at Work, [...]' [Global Human Rights Principles (website), N/A: sustainability.aboutamazon.com] • Not Met: Company has a explicit commitment to All four ILO Core: According to its Global Human Rights Policy, the Company does 'not tolerate discrimination' [...] and does 'not tolerate the use of child labor, forced labor, or human trafficking in any form [...]'. With respect freedom of association it states: 'We respect freedom of association and our employees' right to join, form, or not to join a labor union or other lawful organization of their own selection, without fear of reprisal, intimidation, or harassment.' However, no commitment found to collective bargaining in this policy nor in its Code of Business Conduct. The Company has provided additional sources (i.e. Amazon response to BHRRC) for this subindicator. However, only statements placed in policy documents are accepted for this indicator. [Global Human Rights Principles (website), N/A: sustainability.aboutamazon.com] & [Code of Business and Ethics - Website, N/A: ir.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Company expect suppliers to commit to ILO Core: In its Supply Chain Standards, the Company indicates: 'These standards are derived from the United Nations Guiding Principles on Business and Human Rights, and the Core Conventions of the International Labour Organization (ILO), including the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Universal Declaration of Human Rights'. However, no policy statement found expecting its suppliers to commit to respecting the human rights that the ILO has declared to be fundamental rights at work. The Company has provided feedback to this subindicator. However, source was already in use. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: Company explicitly list All four ILO for suppliers: In its Supply Chain Standards, the Company includes provisions related to the ILO Core, including: 'Amazon does not tolerate the use of child labor. [...] Amazon suppliers must not use forced labor—slave, prison, indentured, bonded, or otherwise. [...] Amazon suppliers must not discriminate [...]. Amazon expects that our suppliers respect the rights of workers to establish and join an 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, no reference found to collective bargaining. The Company has provided feedback to this subindicator. However, source was already in use. <p>[Supply Chain Standards, 2020: sustainability.aboutamazon.com]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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"> • Met: Commitment to respect H&S of workers: The Company indicates that it 'provides a clean, safe and healthy work environment'. [Code of Business and Ethics - Website, N/A: ir.aboutamazon.com] • Not Met: Respect ILO labour standards on working hours or Commits to 48 hours regular work week <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expect suppliers to commit to H&S of their workers: Its Supply Chain Standards reads: 'Amazon expects our suppliers to provide workers with a safe and healthy work environment.' [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: Expect suppliers to commit to ILO labour standard or to 48 hours regular work week: It indicates in its Supply Chain Standards: 'Amazon expects suppliers to regularly monitor working hours to ensure the safety, health, and welfare of workers. Except in special or emergency situations, (i) suppliers are required to limit working hours to no 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 reference found to a maximum of 48 hours for regular working week, and that all overtime must be consensual and paid at a premium rate. [Supply Chain Standards, 2020: sustainability.aboutamazon.com]
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the industry – land, natural resources and indigenous peoples' 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"> • Not Met: Respect land ownership and natural resources as set out in VGGT: The Company has provided sources to this indicator, which has not been possible to find in public domain. No statement found in a formal policy document of a commitment to respect land ownership and natural resources. • Not Met: Respect land ownership and natural resources as set out in The IFC Performance Standards • Not Met: Respecting indigenous peoples' rights or ILO Convention No.169 or UN Declaration: The Company has provided sources to this indicator, which has not been possible to find in public domain. No statement found in a formal policy document of a commitment to respect indigenous rights. • Not Met: Expecting suppliers to make these commitments <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Respecting the right to water: The Company has provided sources to this indicator, which has not been possible to find in public domain. No statement found in a formal policy document of a commitment to respect the right to water (safe access to water, including local communities in the vicinity of operations). • Not Met: Company's policy commits to obtain FPIC: The Company has provided sources to this indicator, which has not been possible to find in public domain. No statement found in a formal policy document of a commitment to obtain FPIC. • Not Met: Expecting suppliers to make these commitments <p>: The Company's Supply Chain Standards indicates: 'Developments and acquisitions of agricultural and forestry land are subject to free, prior, and informed consent of the affected local communities, including women or indigenous peoples and other marginalized stakeholders'. However, no evidence found of commitment to respect the right to water. [Supply Chain Standards, 2020: sustainability.aboutamazon.com]</p>
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AG)	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"> • Met: Women's rights: The Company indicates that, as part of its commitments 'Amazon has signed the United Nation's Women's Empowerment Principles'. [Company website - joining WEP, 14/12/2021: aboutamazon.com] • Met: Expects suppliers to respect at least one of these rights: The Company indicates in its Supply Chain Standards: 'Amazon expects our suppliers to pay particular attention to the risks of exploitation that both domestic and foreign migrant workers face and ensure migrants workers are not discriminated against in respect to these standards. Our suppliers may only engage workers who have a legal right to work unless the workers are related to an approved program with refugee populations (in which case Amazon will assess these projects on a case by case basis). If suppliers engage foreign or domestic migrant workers, such workers

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			<p>must be engaged in full compliance with the immigration and labor laws of the host country. Workers must be able to voluntarily terminate contracts without penalty upon reasonable or legally applicable notice'. [Supply Chain Standards, 2020: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: 'The Company indicates that, as part of its commitments 'Amazon has signed the United Nation's Women's Empowerment Principles'. [Company website - joining WEP, 14/12/2021: aboutamazon.com] • Not Met: Expecting suppliers to respect these rights
A.1.3.AP	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (AP)	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"> • Met: Women's rights: The Company indicates that, as part of its commitments 'Amazon has signed the United Nation's Women's Empowerment Principles'. [Company website - joining WEP, 14/12/2021: aboutamazon.com] • Met: Expects suppliers to respect these rights: The Company indicates in its Supply Chain Standards: 'Amazon expects our suppliers to pay particular attention to the risks of exploitation that both domestic and foreign migrant workers face and ensure migrants workers are not discriminated against in respect to these standards. Our suppliers may only engage workers who have a legal right to work unless the workers are related to an approved program with refugee populations (in which case Amazon will assess these projects on a case by case basis). If suppliers engage foreign or domestic migrant workers, such workers must be engaged in full compliance with the immigration and labor laws of the host country. Workers must be able to voluntarily terminate contracts without penalty upon reasonable or legally applicable notice'. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: The Company indicates that, as part of its commitments 'Amazon has signed the United Nation's Women's Empowerment Principles'. [Company website - joining WEP, 14/12/2021: aboutamazon.com] • Not Met: Expecting suppliers to respect these rights
A.1.3.a.ICT	Commitment to respect human rights particularly relevant to the industry – responsible sourcing of minerals (ICT)	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"> • Not Met: Responsible mineral sourcing: The Company states in its Conflict Minerals Report 2019: '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'. Also, in the Modern Slavery Statement 2020, it states: 'Amazon conducts due diligence on high risk minerals through its responsible minerals program. We recognize conflict minerals are often correlated with instances of modern slavery. While we do not engage in direct sourcing from mine sites and smelters, we are committed to avoiding the use of minerals that have fuelled conflict. We expect Suppliers to support our efforts to identify the origin of high-risk minerals, including gold, tin, tungsten, and tantalum, used in Amazon branded products'. However, no formal statement of commitment to responsible sourcing found (not benefiting armed groups, respecting human rights) in a suitable source for policy statement according to CHRB's revised approach. The Company has provided feedback to CHRB regarding this subindicator. However, evidence was not material. [Conflict minerals report FY2019, 2020: s2.q4cdn.com] & [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] • Met: Based on OECD Guidance: In addition, the Conflict Mineral Report indicates that: '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'. This SD report is considered a proxy for policy statements under CHRB revised approach. [Conflict minerals report FY2019, 2020: s2.q4cdn.com] • Not Met: Requires suppliers to commit to responsible mineral sourcing: In its Supply Chain Standards, the Company states that it is 'committed to avoiding the

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			<p>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, no details found of requirements for suppliers to follow a formal responsible sourcing policy. [Supply Chain Standards, 2020: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commits to follow OECD Guidance for all minerals: As indicated above, the Conflict Mineral Report states that it 'designed [its] 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.' However, no explicit commitment found to responsible sourcing of all minerals in a suitable source for policy statements. [Conflict minerals report FY2019, 2020: s2.q4cdn.com] • Not Met: Suppliers expected to make similar requirements of their suppliers
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the industry – vulnerable groups (ICT)	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"> • Met: Women's rights: The Company indicates that, as part of its commitments 'Amazon has signed the United Nation's Women's Empowerment Principles'. [Company website - joining WEP, 14/12/2021: aboutamazon.com] • Met: Expects suppliers to respect at least one of these rights: The Company indicates in its Supply Chain Standards: 'Amazon expects our suppliers to pay particular attention to the risks of exploitation that both domestic and foreign migrant workers face and ensure migrants workers are not discriminated against in respect to these standards. Our suppliers may only engage workers who have a legal right to work unless the workers are related to an approved program with refugee populations (in which case Amazon will assess these projects on a case by case basis). If suppliers engage foreign or domestic migrant workers, such workers must be engaged in full compliance with the immigration and labor laws of the host country. Workers must be able to voluntarily terminate contracts without penalty upon reasonable or legally applicable notice'. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: CEDAW/Women's Empowerment Principles: The Company indicates that, as part of its commitments 'Amazon has signed the United Nation's Women's Empowerment Principles'. [Company website - joining WEP, 14/12/2021: aboutamazon.com] • Not Met: Expecting suppliers to respect these rights
A.1.4	Commitment to remedy	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"> • Not Met: The Company commits to remedy: The Company states in its Global Human Rights: 'We are committed to providing our employees with appropriate access to grievance mechanisms and remedial action.' However, the commitment is focused on employees, no reference found to other individuals or communities. The sustainability report 2021 states that 'Our strategy to deliver on these commitments is based on the UNGPs and has five pillars: developing strong policies; embedding human rights into our business; assessing, prioritizing, and addressing risk through mechanisms; transparency and stakeholder engagement; and enabling access to effective remedy'. However no evidence found of a formal commitment to remedy placed in a policy document. Sustainability reports or modern slavery statements are not considered a suitable source for policy statements under CHRB's revised approach. The Company has provided additional sources for this subindicator. However, evidence was not material. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] & [Global Human Rights Principles (website), N/A: sustainability.aboutamazon.com] • Not Met: Company expect suppliers to make this commitment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Collaborating with other remedy initiatives • Not Met: Work with suppliers to remedy impact: The Modern Slavery Statement indicates that 'we prioritize mechanisms that drive continuous improvement and are committed to working with our suppliers to remedy identified issues and put systems in place to prevent issues in the future'. However, modern slavery

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			statement (or sustainability report) is not considered a suitable source for policy statements under CHRB's revised approach. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] & [2020 Sustainability report, 2021: sustainability.aboutamazon.com]
A.1.5	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"> Not Met: Zero tolerance attacks on HRs Defenders (HRDs): The sustainability report indicates that 'We carefully review and investigate allegations of unlawful conduct or other conduct that violates any of our policies. In addition, we will not allow retaliation against an employee for reporting misconduct by others in good faith'. However, no commitment found to not tolerate nor contribute to threats or attacks against human rights defenders (anyone that peacefully opposes the company's activities due to human rights). Commitment has to be placed in a formal policy statement document. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] Not Met: Company expect suppliers to make this commitment: The supplier code states that 'Amazon expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns'. However, no requirement found to commit to not tolerate nor contribute to threats or attacks against human rights defenders (anyone that peacefully opposes the company's activities due to human rights). [Supply Chain Standards, 2020: sustainability.aboutamazon.com] Score 2 <ul style="list-style-type: none"> Not Met: Work with HRD to create safe and enabling environment

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Board level responsibility for HRs: According to its Charter, the Company's Nominating and Corporate Governance Committee 'oversees and monitors the Company's policies and initiatives relating to corporate social responsibility, including human rights and ethical business practices, and risks related to the Company's operations and engagement with customers, suppliers, and communities, [...]' In addition, the Company indicates in its MSA 2020: 'We are committed to embedding human rights considerations into decision-making across the company and into our policy and governance framework. This governance starts with the Amazon Board of Directors (Board), which appoints committees for oversight on specific issues. Committees keep the Board informed of committee actions and assist the Board in fulfilling its oversight responsibilities. The Audit Committee oversees Amazon's compliance with legal and regulatory requirements, such as issues relating to the Code of Business Conduct and Ethics. The Nominating and Corporate Governance Committee oversees Amazon's global environmental, corporate social responsibility (including as this relates to its operations and supply chain), and corporate governance policies and initiatives. The Leadership Development and Compensation Committee oversees human capital management matters, including workplace safety, culture, diversity, discrimination, and harassment'. [Nominating and Corporate Governance Committee Charter, N/A: ir.aboutamazon.com] & [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] Not Met: Describe HR expertise of Board member Score 2 <ul style="list-style-type: none"> Not Met: Speeches/letters by Board members or CEO: The Company has provided feedback to this subindicator. However, evidence was not material. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]
A.2.2	Board responsibility	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Board/Committee review HRs strategy Not Met: Examples/trends re HR discussion in the last reporting period: The Company indicates that 'In 2021, as part of our corporate governance

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			engagement, we met with corporate governance representatives at shareholders owning over 35% of our stock (not counting the approximately 13% voted by our founder and Executive Chair) and responded to numerous letters from our investors. Our direct engagement with shareholders helps us better understand our shareholders' priorities, perspectives, and issues of concern while giving us an opportunity to elaborate on our many initiatives and practices and to address the extent to which various aspects of these matters are (or are not) significant given the scope and nature of our operations and our existing practices. We take insights from this feedback into consideration and regularly share them with our Board as we review and evolve our practices and disclosures'. However, no specific details found in relation to specific human rights issues or trends discussed. This is expected to refer to Board of directors discussion and revision on human rights strategy or management. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: How affected stakeholders/HR experts informed discussions
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"> • Not Met: Incentives for at least one board member • Not Met: At least one key HR risk, beyond employee H&S Score 2 <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other board performance criteria
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: Describe frequency and triggers for reviewing Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions decided

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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Senior responsibility for HR implementation and decision making Score 2 <ul style="list-style-type: none"> • Met: How it assigns Day-to-day responsibility: On its website, the Company reports: 'We are committed to identifying, preventing, and mitigating adverse human rights impacts, and are continuously working to improve our approach. At Amazon, every business deploys a variety of mechanisms to help us inspect our business and make decisions at various points of product and process development and in the execution of our day-to-day operations. Social Responsibility teams review the performance and impact of our own programs and inspect activity in our global supply chains. We know we have more to do, and we are committed to widening our lens to better understand the potential human rights impacts of our business'. [Human rights website, N/A: sustainability.aboutamazon.com] • Not Met: Day-to-day resources and expertise allocation in own ops • Not Met: Resources and expertise allocation in the supply chain
B.1.2	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"> • Not Met: Senior manager incentives for human rights: According to its Proxy Statement 2020, in its Executive Compensation section: 'Our compensation program provides strong long-term incentives to align our employees' interests with our shareholders' interests'. No further information of its long-term

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			<p>incentives, or other evidence which linked human rights to the Company's incentive mechanisms for senior managers. No new evidence in latest documents. [Proxy Statement 2020, 27/05/2020: s2.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: At least one key HR risk, beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria made public • Not Met: Review of other senior management performance
B.1.3	Integration with enterprise risk management	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"> • Met: HR risks is integrated as part of enterprise risk system: 'In its Annual Report 2021, the Company presents its Risks Factors, included within the ERM: 'Our Supplier Relationships Subject Us to a Number of Risks [...] violations by our suppliers or other vendors of applicable laws, regulations, contractual terms, intellectual property rights of others, or our Supply Chain Standards [which includes human rights], [...] could expose us to claims, damage our reputation, limit our growth, and negatively affect our operating results'. [Annual Report 2021, 2022: s2.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Provides an example • Not Met: Audit Committee or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external 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"> • Not Met: Score of 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Communicates its policy to all workers in own operations: In its Modern Day Slavery Statement 2020, the Company states: 'All Amazon employees take mandatory compliance training courses on the Code, Anti-Bribery Compliance, and Workplace Harassment'. The Code of Business Conduct, however, only cover discrimination (as material issues). In addition, in its Sustainability report 2020, the Company indicates: 'In 2019, we launched an employee training program in our logistics network on human trafficking and modern slavery. In the program's first phase, we trained UK fulfilment network managers. In 2020, we will train employees across our entire global fulfilment network to recognize signs of modern slavery using localized scenarios'. However, it is not clear whether all employees receive communications with Company's human rights commitments. Current evidence seems to focus in specific trainings/communications for specific teams. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] & [Sustainability Report 2019, 06/2020: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communication of policy commitments to stakeholder: The Company has provided feedback to CHRB regarding this indicator. However, evidence was not material. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: How policy commitments are made accessible to audience
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"> • Not Met: Meets ILO requirement for suppliers on A.1.2.a: See indicator A.1.2.a • Not Met: Steps to communicate policy commitments to supply chain • Met: Requires suppliers to communicate policy requirements: The Company indicates in its Supply Chain Standards: 'In order to ensure these standards are cascaded throughout our supply chain, we expect suppliers to consistently monitor and enforce these standards in their own operations and supply chain, as well as make improvements to meet or exceed our expectations and those of our customers as reflected in our Supplier Code.' With respect the scope of the document, it indicates: 'Amazon expects all products sold in the Amazon Store or provided to Amazon to be manufactured or produced in accordance with this Supplier Code of Conduct ("Supplier Code"). We also expect all suppliers of goods and services to Amazon to comply with the Supplier Code, even when this Supplier Code exceeds the requirements of applicable law'. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: In its Modern Slavery Act Statement 2020, the Company states: 'Selling Partners contracting with Amazon for services, (including Selling on Amazon, Fulfilment by Amazon, Amazon Advertising,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Transaction Processing Services, and the Selling Partner API) agree to the terms of the Amazon Services Business Solutions Agreement, which incorporates Amazon's Supply Chain Standards.' [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Not Met: Company requires suppliers to cascade down to their suppliers
B.1.5	Training on Human Rights	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"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: How workers are trained on HR policy commitments: In its Modern Day Slavery Statement 2020, the Company states: 'All Amazon employees take mandatory compliance training courses on the Code, Anti-Bribery Compliance, and Workplace Harassment'. The Code of Business Conduct, however, only cover discrimination (as material issues). 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'. Finally, in its Sustainability Report, it indicates: 'In 2019, we launched an employee training program in our logistics network on human trafficking and modern slavery. In the program's first phase, we trained UK fulfilment network managers. In 2020, we will train employees across our entire global fulfilment network to recognize signs of modern slavery using localized scenarios.' However, no evidence found describing a general human rights training program, not focused only on a specific employee group. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] & [Sustainability Report 2019, 06/2020: sustainability.aboutamazon.com] • Met: Trains relevant 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 Sustainability Report, it indicates: 'In 2019, we launched an employee training program in our logistics network on human trafficking and modern slavery. In the program's first phase, we trained UK fulfilment network managers. In 2020, we will train employees across our entire global fulfilment network to recognize signs of modern slavery using localized scenarios.' Finally, on its website section 'Sustainability Question Bank' it reports: '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, N/A: amazon.com] & [Sustainability Report 2019, 06/2020: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See indicator A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains suppliers to meet company's HR commitment: The Company reports that it implemented training programmes in suppliers related to recruitment practices and responsible recruitment. However, this subindicator looks for evidence of suppliers being trained in relation to the supplier code of conduct and human rights requirements. Capability building in specific topics related to human rights are assessed in B.1.7 and section D. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: Disclose % trained
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"> • Not Met: Scores at least 1 on A.1.2.a: See indicator A.1.2.a • Not Met: Monitoring implementation of HR policy commitments across global ops and supply chain: In its Modern Slavery Act Statement 2020, the Company states: 'The Audit Committee oversees Amazon's compliance with legal and regulatory requirements, such as issues relating to the Code of Business Conduct and Ethics.' With respect its Supply Chain monitoring, the Company indicates in its

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Supply Chain Standards Manual: 'Audits are a tool to help you identify and address issues in facilities that produce Amazon branded products. As a potential or active supplier to Amazon and/or one of our subsidiaries, you are required to undergo an Amazon Social Responsibility audit. All suppliers must submit an Amazon-approved audit of their facilities before beginning production of Amazon-branded products. You can 1) submit an audit from an approved industry association, or 2) complete an Amazon Managed Audit.' In addition, in this document, the Company defines Suppliers as 'An entity that produces, manufacturers, assembles, or provides goods or services that are sold and delivered to Amazon.' However, no evidence found describing the auditing process of own operations. The Company has provided feedback to CHRB regarding this indicator. However, evidence refers to supplier audits. No evidence found of how the Company monitors compliance with its human rights commitments in its own operations. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] & [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net]</p> <ul style="list-style-type: none"> • Not Met: Proportion of supply chain monitored • Not Met: Describe how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a: See A.1.2.a • Met: Describes corrective action process: In addition, the Company indicates in its Supply Chain Standards Manual: 'After we receive and analyse audit results, we will provide a summary of any issues identified in the audit. You are expected to review the results, and develop a CAP that details immediate actions to address high-risk issues, and a long-term plan to prevent issues from reoccurring. Violations of Amazon's Qualification Requirements must be immediately addressed as a condition of initial and continued production with Amazon. [...] Although we reserve the right to terminate a relationship at any time for failure to meet our Supplier Code of Conduct, in most cases, termination will occur when a supplier refuses to cooperate with an assessment, refuses to change behavior or practice, or does not make meaningful progress on remediation.' It also states in its Modern Day Slavery Statement 2020 that: 'If audit findings require remediation, including those related to modern slavery, Suppliers develop a corrective action plan detailing actions to address those findings. We may conduct announced or unannounced on-site verifications or request additional documentation from Suppliers.' [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] & [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] • Met: Disclose findings and number of corrective action: The Company discloses information about the percentage of Audits where issue was found in 2019 vs 2020, including Worker-paid recruitment fees, Control of documents and Mandatory overtime. On the other hand, on its website it reports: 'In 2020, we conducted 4,708 assessments to help us determine which suppliers to work with and, for those we do engage, to help us continually understand and improve those suppliers' practices'. Similar information can be found in 2021 modern slavery statement, including year on year data 2019-2021, in addition to other topics of compliance such as 'incomplete employment information' and 'ineffectively communicated employment information'. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] & [Supplier assessment, N/A: sustainability.aboutamazon.com]
B.1.7	Engaging and terminating 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"> • Not Met: HR affects selection of suppliers: The Company indicates in its Supply Chain Standards: 'Audits are a tool to help you identify and address issues in facilities that produce Amazon branded products. As a potential or active supplier to Amazon and/or one of our subsidiaries, you are required to undergo an Amazon Social Responsibility audit. All suppliers must submit an Amazon-approved audit of their facilities before beginning production of Amazon-branded products.' In addition, on its website section 'Supplier assessment', it indicates: 'We assess our suppliers of Amazon-branded products across four main categories: 1) Labor, 2) Health and Safety, 3) Environment, and 4) Ethics. [...] We utilize three types of assessments: Pre-Production Assessments: Suppliers must submit an Amazon-approved assessment of their facilities before beginning production of Amazon-branded products (44% of assessments conducted in 2020 were Pre-Production

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Assessments).' However, it is not clear how human rights performance is taken into account in the identification or selection of business partners included in agriculture sector. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] & [Supplier assessment, N/A: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Met: HR affects on-going supplier relationships: In addition, the Company states: 'Although we reserve the right to terminate a relationship at any time for failure to meet our Supplier Code of Conduct, in most cases, termination will occur when a supplier refuses to cooperate with an assessment, refuses to change behavior or practice, or does not make meaningful progress on remediation'. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe positive incentives offered to respect human rights • Met: Working with suppliers to meet HR requirements: The Company indicates in its modern slavery statement that 'we distributed our Responsible Recruitment Guidebook to over 70 suppliers in recruitment fees issues were identified. We continued to work directly with our suppliers to strengthen responsible recruitment practices and to encourage repayment of fees to workers. We offered training on responsible recruitment practices through the Responsible Business Alliance and International Organization on Migration to over 50 suppliers and offered worker awareness training for sites in a high-risk region to improve foreign migrant workers' livelihood'. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] & [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com]
B.1.8	Approach to engagement with 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"> • Not Met: Stakeholder process or systems to identify and engage with workers/communities in the last two years: The Company states on its Human Rights website section: 'We are committed to driving industry-wide best practices in human rights due diligence through increased disclosures about our approach and by expanding our stakeholder engagement.' However, no information found 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. [Human rights website, N/A: sustainability.aboutamazon.com] • Not Met: Discloses stakeholders that HRs may be affected • Not Met: Provides two examples of engagement with stakeholders: Example 1: As part of its audit process 'auditors conduct regular on-site inspections and confidential worker interviews. However, no other example of engagement with affected stakeholders was found. The Company has provided feedback to this subindicator showing engagement with stakeholders. However, all engagements found refer to work conducted with multi-stakeholder initiatives and to the initiative's work, rather than specific dialogue held with affected stakeholders in the context of these initiatives. This subindicator looks for specific examples of dialogue held with affected stakeholders in relation to human rights. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HR issues • Not Met: Describe how views influenced company's HR approach

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	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"> • Not Met: Identifying risks in own operations

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Identifying risks through relevant business relationships: The Company reports about its HRIA for Amazon Devices: 'In 2020, we conducted our first HRIA to assess the raw and recovered materials supply chain for Amazon-branded digital devices (Kindle, Fire TV, Fire Tablet, Ring, and Echo), including the manufacture, assembly, and return of those products. [...] This supply chain is, in many places, highly opaque, adding to the challenge of identifying and prioritizing salient human rights risks and impacts. For this assessment, we focused on four supply chain categories: Tier 1 and Tier 2 manufacturing, reverse logistics, minerals and metals, and plastics and synthetics. We engaged an independent third-party expert, Article One, to research key human rights risks across these categories, conduct a gap analysis of Amazon's current approach to managing human rights risks, and identify opportunities to have a positive impact. The process included internal interviews, reviews of media and third-party reporting, and external stakeholder engagement. We selected external stakeholders based on their representation of impacted groups, geographic scope, and expertise in human rights. They included experts on a wide array of issues, including human rights and sustainable development in technology, finance, waste, plastics, responsible minerals, circular economy, and science-based solutions'. Although this refers to a fraction of its supply chain, this datapoint allows awarding for specific operations/business. [Human rights impact assessment, 2020: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe ongoing global risk identification in consultation with stakeholder/HR experts: As indicated above the Company reports on its HRIA for Amazon Devices, which included stakeholder and human rights experts consultation, however the HRIA was focused only in a fraction of the Company's supply chain. The Company also reports in relation to all multistakeholder initiatives in which it participates, sponsors and non-profit focused on specific human rights topics. However, this indicator looks for a description of how it consults with experts and affected stakeholders particularly in the identification process of the due diligence. [Human rights impact assessment, 2020: sustainability.aboutamazon.com] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: Triggered by new circumstances • Not Met: Describes risks identified
B.2.2	Assessing 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"> • Not Met: Describe process for assessment of HR risks and discloses salient HR issues • Not Met: How process applies to supply chain: The Company reports about its HRIA for Amazon Devices: 'In 2020, we conducted our first HRIA to assess the raw and recovered materials supply chain for Amazon-branded digital devices (Kindle, Fire TV, Fire Tablet, Ring, and Echo), including the manufacture, assembly, and return of those products. [...] This supply chain is, in many places, highly opaque, adding to the challenge of identifying and prioritizing salient human rights risks and impacts. For this assessment, we focused on four supply chain categories: Tier 1 and Tier 2 manufacturing, reverse logistics, minerals and metals, and plastics and synthetics. We engaged an independent third-party expert, Article One, to research key human rights risks across these categories, conduct a gap analysis of Amazon's current approach to managing human rights risks, and identify opportunities to have a positive impact. The process included internal interviews, reviews of media and third-party reporting, and external stakeholder engagement. We selected external stakeholders based on their representation of impacted groups, geographic scope, and expertise in human rights. They included experts on a wide array of issues, including human rights and sustainable development in technology, finance, waste, plastics, responsible minerals, circular economy, and science-based solutions.' However, this HRIA was focused only in a fraction of the Company's supply chain. [Human rights impact assessment, 2020: sustainability.aboutamazon.com] • Not Met: Public disclosure of the results of HR assessment: As a result of its HRIA, the Company reports: 'The assessment found that Amazon suppliers in this category had moderate to high levels of awareness of Amazon's social compliance requirements. However, challenges remain throughout the electronics industry as a whole, including: difficulties enforcing working hour and rest requirements; low or

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>unequal wages, even when compliant with national minimum wages standards; and absence of effective grievance mechanisms for workers.' However, this HRIA was focused only in a fraction of the Company's supply chain. [Human rights impact assessment, 2020: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: How it involved affected stakeholders in the assessment: The Company also reports in relation to all multistakeholder initiatives in which it participates, sponsors and non-profit focused on specific human rights topics. However, this indicator looks for a description of how it involves affected stakeholders particularly in the assessment of saliency of the different potential impacts. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	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"> • Not Met: Action Plans to mitigate risks • Not Met: Description of how global system applies to supply chain • Met: Example of actions decided on at least 1 salient HR issues: The Company reports in its MSA 2020: 'The issue: In Japan, many foreign migrant workers come into the country through the Technical Intern Training Program (TITP). To participate in this government program, migrant workers apply through accredited recruiting organizations in their home country. [...] Most countries of origin allow recruitment fees and related costs to be legally charged to migrant workers, however, workers at times pay significantly more than what is legally permitted. Migrant workers are also subject to other types of abuses, such as employers retaining workers' identity documents, excessive working hours, underpayment of overtime, and workers' forced return to their countries of origin. [...] In 2020, Amazon partnered with CREST to conduct research on the legal frameworks governing migrant workers in Japan and the challenges and vulnerabilities workers face with TITP and other migrant worker entry points. In 2021, in partnership with CREST, we will use this research to develop a region-specific education program for our Suppliers on migrant worker vulnerabilities in Japan. The training will support suppliers in identifying, assessing, and mitigating specific risks to migrant workers, including worker-paid recruitment fees.' [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involve stakeholders in decisions about actions
B.2.4	Tracking 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"> • Not Met: System for tracking or monitor if actions taken are effective • Not Met: Lessons learnt from checking system effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Involve stakeholders in evaluation of actions taken
B.2.5	Communicating on human rights 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"> • Not Met: Provides two examples of comms with stakeholders: The Company has provided feedback to CHRB regarding this indicator. However, evidence was not material. This subindicator looks for evidence of how the Company has responded and communicated with affected stakeholders regarding specific human rights impacts raised by them or on their behalf. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] & [2021 Sustainability report, 2022: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% 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	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> 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.' In addition, the Company indicates in its Proxy Statement 2022: 'We have an "open door" policy, which means we welcome and encourage any employee to discuss suggestions, concerns, or feedback with their manager, a Human Resources team member, or any member of Amazon's leadership team.' [Code of Business and Ethics - Website, N/A: ir.aboutamazon.com] & [Proxy Statement 2022, 2022: s2.g4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Channel is available in all appropriate languages and workers aware: The Company states in its MSA 2020: 'Employees may raise questions or report suspected violations of our Code through Amazon's Ethics Line, by phone or online. Employees have made reports in 30 languages of the 165 available to them. Reports to the Ethics Line are answered by an independent third party and may be made anonymously upon request. [...] All Amazon employees take mandatory compliance training courses on the Code, Anti-Bribery Compliance, and Workplace Harassment'. However, the Code of Conduct does not include a link to the Ethics Line and only refers to the Legal Department or their management: 'Employees should speak with anyone in their management chain or the Legal Department when they have a question about the application of the Code of Conduct or when in doubt about how to properly act in a particular situation. 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. Please see the reporting guidelines for information and instructions. Amazon.com will not allow retaliation against an employee for reporting misconduct by others in good faith. Employees must cooperate in internal investigations of potential or alleged misconduct'. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] & [Code of Business and Ethics - Website, N/A: ir.aboutamazon.com] Met: Describe how workers in the supply chain have access to grievance mechanism: In its Supply Chain Standards, the Company indicates that it 'expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns. Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor.' [Supply Chain Standards, 2020: sustainability.aboutamazon.com] Met: Expect Suppliers to convey expectation to their own suppliers: In its Supply Chain Standards, the Company indicates that it 'expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns. Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor.' [Supply Chain Standards, 2020: sustainability.aboutamazon.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external	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"> Not Met: Grievance mechanism for community <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Describes accessibility and local languages and stakeholder awareness Not Met: Communities access mechanism direct or through suppliers: The supplier code states the following: 'Amazon expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to

Indicator Code	Indicator name	Score (out of 2)	Explanation
	individuals and communities		submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns. Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor'. However, requirement focuses on workers. It is not clear whether suppliers' external stakeholders can file complaints. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] <ul style="list-style-type: none"> • Not Met: Expect supplier to convey expectation to their own suppliers
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"> • Not Met: Engages users to create or assess system • Not Met: Examples (at least two) of how they do this Score 2 <ul style="list-style-type: none"> • Not Met: Engages with potential or actual users on the improvement of the mechanism • Not Met: Provides user engagement example (at least two) on improvement
C.4	Procedures related to the mechanism(s)/channel(s) are equitable, 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"> • Not Met: Response timescales and how complainants will be informed • Not Met: Describe support (technical, financial, etc) available for equal access by complainants Score 2 <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Escalation to senior/independent level
C.5	Prohibition of retaliation for raising complaints or concerns	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • 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, no evidence found of a provision prohibiting retaliation against other stakeholders for raising human rights related complaints or concerns. [Code of Business and Ethics - Website, N/A: ir.aboutamazon.com] • 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, it is not clear if anonymous reporting is allowed, or whether there are other practical measures to prevent retaliation. [Code of Business and Ethics - Website, N/A: ir.aboutamazon.com] Score 2 <ul style="list-style-type: none"> • Not Met: Company indicate it will not retaliate against workers/stakeholders • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: In its Supply Chain Standards, the Company indicates that it 'expects suppliers to protect worker whistleblower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns.' However, the non-retaliation policy does not include other stakeholders. [Supply Chain Standards, 2020: sustainability.aboutamazon.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive rights • Not Met: Company does not require confidentiality provisions Score 2 <ul style="list-style-type: none"> • Not Met: Will work with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes how remedy has been provided: The Company indicates in its MSA 2020: '[...] in cases of worker-paid recruitment fees, we identify where workers migrated from and how much they paid in recruitment fees. If fees have

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>been paid, we require the Supplier to reimburse workers in full [...]' . No evidence found on how remedy has actually been provided. The Company has provided feedback to CHRB regarding this indicator, in relation to partnership with international Organization for Migration on recruitment practices in Japan and key countries of origin. However, this subindicator looks for evidence of how actual remedy has been provided to victims. Alternatively the Company could describe what are the processes in place to provide remedy for victims (in case no adverse impacts are identified). [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Not Met: Says how it would provide remedy for victims if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Changes to systems, processes and practices to stop similar impact • Not Met: Describe approach to monitoring implementation of agreed remedy • Not Met: Approach to learning from incident to prevent future impacts
C.8	Communication on the effectiveness of grievance mechanism(s) 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"> • Not Met: Number grievances filed, addressed or resolved and outcome achieved • Not Met: How lessons from mechanism improve management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Evaluation of the channel/mechanism and changes made as result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% 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"> • Not Met: Discloses timebound target for suppliers to pay living wage or include in code or contracts: The Company requires its suppliers 'to pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws. [...] In addition, we encourage our suppliers to regularly evaluate whether workers earn enough to meet their basic needs and the needs of their family.' However, the last provision is not a requirement and it does not include a reference to discretionary needs. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.1.2	Aligning purchasing decisions with human rights	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"> • Met: Avoids business model pressure on HRs (purchasing practices): The Company states on its website: 'We engaged in responsible purchasing practices and learned about impact to workers: Since the beginning of the COVID-19 pandemic, Amazon has honored all orders to our global suppliers from our U.S. and European private-label apparel businesses. We also worked with Better Buying, an initiative working to improve purchasing practices in global supply chains, to conduct a survey of our suppliers in Vietnam and their workers on the impacts of our practices during COVID-19. We received more than 1,300 worker responses, indicating that their primary concerns were unstable personal finances related to business uncertainty during COVID-19, changes to forecasted orders, and factory safety concerns linked to shipment date pressures. Suppliers gave positive feedback on several aspects of our practices, including our increased communication during COVID-19, decisions to honor orders, and flexibility on delivery times'. [Responsible sourcing - progress. Purchasing practices, N/A: sustainability.aboutamazon.com] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Met: Examples of how it assessed, addressed and change purchasing practices: See above [Responsible sourcing - progress. Purchasing practices, N/A: sustainability.aboutamazon.com]
D.1.3	Mapping and disclosing 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"> • Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The modern slavery statement 2020 indicates that 'we publish a map and list of suppliers that produce Amazon-branded apparel, consumer electronics, food and beverage, and home goods products to provide customers and external stakeholders visibility into where we source. The map is updated annually in June and is subject to periodic updates'. It also indicates in the 2021 statement that 'in 2021, we continued to map deeper tiers of our Amazon-branded product supply chains in order to identify the most salient and material risks. Commodity supply chains are complicated and fragmented, and improved visibility into raw material supply chains better enables businesses to identify human rights and labour rights violations and hold suppliers accountable'. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company discloses its Supply List on its website: 'The facilities listed produce Amazon-branded apparel, consumer electronics, and home goods products.' The list includes names and addresses. However, as indicated above, it is not clear whether these include indirect suppliers [Human rights website, N/A: sustainability.aboutamazon.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.1.4.b	Prohibition of 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"> • Not Met: Child Labour rules in codes or contracts: Its Supply Chain Standards indicates: 'Amazon does not tolerate the use of child labor. Suppliers are required to engage workers who are: (i) 15 years old, (ii) the age of completion of compulsory education, or (iii) the minimum age to work in the country where work is performed, whichever is greater. Furthermore, workers under the age of 18 ("young workers") must not perform hazardous work that is likely to jeopardize their health or safety or compromises their education (e.g., night shifts, overtime). [...] Amazon supports the development of legitimate workplace apprenticeship programs that support the students' educational goals, and comply with Amazon's Supplier Code and applicable local laws.' However, no information found about provisions to verify the age of job applicants and workers and remediation programmes. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: How working with suppliers on child labour: The Company also indicates in its Supply Chain Standards Manual: 'We partner closely with our suppliers to drive continuous improvement in working conditions. [...] 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, to learn how to recognize and prevent forced labor, how to comply with wage and working hour requirements, and how to implement management systems.' However, no evidence found on how it works with suppliers on specific child labor matters. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.b	Prohibition of forced labour: Recruitment fees and costs (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"> • Met: Debt and fees rules in codes or contracts: The Company indicates in its Supply Chain Standards the following: 'Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees for their employment either in their home country or the country where work is performed. Suppliers are required to bear or reimburse to their workers the cost of any such fees incurred at any point during the recruitment process, even if outside of the suppliers' direct control of the recruitment process. All fees and expenses charged to workers must be disclosed to Amazon and communicated to workers in their native language in advance of employment or work. Amazon also expects our suppliers to hold their third-party labor agents or brokers to the standards and practices covered by our Supplier Code. Suppliers are required to analyse and monitor the practices of recruitment agencies and labor brokers, and employ agencies that act ethically and in the best interests of workers when contracting labor. Suppliers must ensure that staffing or recruiting agencies comply with our Supplier Code, as well as all applicable laws of the country where work is performed and the worker's home country.' [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] • Not Met: How working with suppliers on debt & fees: The Company reports in its MSA 2020: 'Amazon engaged Verité, a recognized leader in global labor protection, to develop a Responsible Recruitment Guidebook for our Suppliers focused on migrant worker recruitment. The guidebook offers Suppliers guidance on implementing a zero worker-paid recruitment fee policy, instructs Suppliers on how to calculate fee repayment and create an effective reimbursement plan for workers who paid recruitment fees, and provides strategies for engaging responsible labor agents. [...] We believe we can incentivize lasting change by working closely with Suppliers to ensure they pay back recruitment fees owed to workers and training Suppliers on responsible recruitment, including how to identify responsible labor agents for future hiring. Some Suppliers have difficulty identifying if workers have paid recruitment fees and, when found, remediating, particularly if fees are charged to workers by labor contractors in their home countries. We are committed to working with our Suppliers on remediation when recruitment fee issues are identified. For example, a 2020 audit of a Taiwanese Supplier found Vietnamese migrant workers had paid recruitment fees prior to arrival at the factory and continued to pay monthly service fees to the local labor broker. Our regional team shared our Responsible Recruitment Guidebook and worked with the Supplier to develop a comprehensive remediation plan. The Supplier now pays all service fees directly to the local labor broker on behalf of the migrant workers and has been working to calculate and reimburse all affected workers for the fees they already paid. The Supplier is on track to repay all fees to the impacted workers and set up systems to prevent the situation in the future'. It is not clear, however, if this applies to agricultural supply chain, as particular example refer to factories. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Met: Analysis of trends in progress made: The Company provides figures in relation to % of audits where the issue 'Worker-paid recruitment fees: Fees related to recruiting and hiring were not disclosed in advance or not reimbursed'. for the years 2019, 2020 and 2021. It also states that 'We accept assessments completed by qualified independent audit firms based on our own assessment standards and those of industry associations, including the Sedex (SMETA), amfori (amfori BSCI), and the Responsible Business Alliance; the certification standard Social Accountability International (SA8000); and the Better Work program'. These type of industry associations work in different sectors. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]
D.1.5.d	Prohibition of forced labour: Wage practices (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"> • Not Met: Suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.5.f	Prohibition of forced labour: Restrictions on workers (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"> • Met: Free movement rules in codes or contracts: The Company's Supply Chain Standards: 'All work must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice. [...] Suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working. Suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing. Workers must be given clear, understandable documentation that defines the terms and conditions of their engagement in a language and manner understood by the worker.' [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: How working with suppliers on free movement <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Met: Provides analysis of trends demonstrating progress: The Company provides figures in relation to % of audits where the issue 'Control of documents: Employers maintain possession or control over worker identity documents' for the years 2019, 2020 and 2021. It also states that 'We accept assessments completed by qualified independent audit firms based on our own assessment standards and those of industry associations, including the Sedex (SMETA), amfori (amfori BSCI), and the Responsible Business Alliance; the certification standard Social Accountability International (SA8000); and the Better Work program'. These type of industry associations work in different sectors. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]
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"> • Not Met: FoA & CB rules in codes or contracts: The Company indicates in its Supply Chain Standards that it expects that its 'suppliers respect the rights of workers to establish and join an 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, no reference found to collective bargaining. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.1.7.b	Health and safety: Fatalities, lost days, injury, occupational disease 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"> • Met: Sets out clear Health and Safety requirements: The Company includes health and safety requirements in its Supply Chain Standards, including provisions with respect the following topics: Health and Safety, Occupational Safety; Physically Demanding Work; Emergency Preparedness and Response; Machine Safeguarding; Sanitation and Housing. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period • Not Met: Fatalities rate for lasting reporting period • Not Met: Occupation disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.8.b	Land rights: Land acquisition (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"> • Met: Rules on land & owners in codes or contracts: With respect Land Rights, the Company indicates in its Supply Chain Standards: 'It is important that our suppliers respect the legal land rights of individuals, indigenous people, and local communities. Upon Amazon's request, suppliers and producers are required to demonstrate a legal right to use the land. Developments and acquisitions of agricultural and forestry land are subject to free, prior, and informed consent of the affected local communities, including women or indigenous peoples and other marginalized stakeholders.' [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: How working with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Includes resettlement requirements that the supplier provides financial compensation • Not Met: Assessment of the number affected by land rights issues in its SP • Not Met: Provides analysis of trends demonstrating progress
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"> • Not Met: Rules on water stewardship in codes or contracts: The Company indicates in its Supply Chain Standards: 'We encourage suppliers to look for opportunities to implement a water management program. All wastewater is to be identified, monitored, controlled, and treated prior to discharge or disposal as required by law. [...] Workers must have reasonable access to clean toilet facilities and potable drinking water. [...] and reasonable access to hot water for bathing [...]'. However, no evidence found of a requirement to refrain from negatively affecting access to safe water (right to water). [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: How working with suppliers on water stewardship issues: The Company also indicates in its Supply Chain Standards Manual: 'We partner closely with our suppliers to drive continuous improvement in working conditions. [...] 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, to learn how to recognize and prevent forced labor, how to comply with wage and working hour requirements, and how to implement management systems.' However, no information found describing how it works with suppliers on specific water stewardship matters. No new evidence found in latest documents. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by lack of access to water and sanitation • Not Met: Provides analysis of trends demonstrating progress
D.1.10.b	Women's rights (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"> • Not Met: Women's rights in codes or contracts • Met: How working with suppliers on women's rights: The Company indicates in its Sustainability Report 2020: 'we are actively working to empower women across dimensions of health, finances, and career development. This includes collaborating with globally recognized programs such as Better Work and, in 2019, beginning an initiative with Business and Social Responsibility's HER project. To date, over 8,000 women in our supply chain are involved in BSR HER project.' [Sustainability Report 2019, 06/2020: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress

D.2 Apparel

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.1.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"> • Not Met: Discloses living wage requirements in supplier code or contracts: The Company requires its suppliers 'to pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws. [...] In addition, we encourage our suppliers to regularly evaluate whether workers earn enough to meet their basic needs and the needs of their family.' However, the last provision is not a requirement and it does not include a reference to discretionary needs. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress
D.2.2	Aligning purchasing decisions with human rights	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"> • Met: Avoids business model pressure on HRs (purchasing practices): The Company states on its website: 'We engaged in responsible purchasing practices and learned about impact to workers: Since the beginning of the COVID-19 pandemic, Amazon has honored all orders to our global suppliers from our U.S. and European private-label apparel businesses. We also worked with Better Buying, an initiative working to improve purchasing practices in global supply chains, to conduct a survey of our suppliers in Vietnam and their workers on the impacts of our practices during COVID-19. We received more than 1,300 worker responses, indicating that their primary concerns were unstable personal finances related to business uncertainty during COVID-19, changes to forecasted orders, and factory safety concerns linked to shipment date pressures. Suppliers gave positive feedback on several aspects of our practices, including our increased communication during COVID-19, decisions to honor orders, and flexibility on delivery times.' [Responsible sourcing - progress. Purchasing practices, N/A: sustainability.aboutamazon.com] • Not Met: Practices adopted to pay suppliers in line with agreed timeframes • Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Met: Examples of how it assessed, addressed and change purchasing practices: See above [Responsible sourcing - progress. Purchasing practices, N/A: sustainability.aboutamazon.com]
D.2.3	Mapping and disclosing 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"> • Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The modern slavery statement 2020 indicates that 'we publish a map and list of suppliers that produce Amazon-branded apparel, consumer electronics, food and beverage, and home goods products to provide customers and external stakeholders visibility into where we source. The map is updated annually in June and is subject to periodic updates'. It also indicates in the 2021 statement that 'in 2021, we continued to map deeper tiers of our Amazon-branded product supply chains in order to identify the most salient and material risks. Commodity supply chains are complicated and fragmented, and improved visibility into raw material supply chains better enables businesses to identify human rights and labour rights violations and hold suppliers accountable'. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] & [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses names and locations of significant parts of SP and why: The Company discloses its Suppliers List on its website: 'The facilities listed produce Amazon-branded apparel, consumer electronics, and home goods products.' The list includes names and addresses. However, as indicated above, it is not clear if this includes indirect suppliers. [Human rights website, N/A: sustainability.aboutamazon.com] • Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.4.b	Prohibition of 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"> • Not Met: Child Labour rules in codes or contracts: Its Supply Chain Standards indicates: 'Amazon does not tolerate the use of child labor. Suppliers are required to engage workers who are: (i) 15 years old, (ii) the age of completion of compulsory education, or (iii) the minimum age to work in the country where work is performed, whichever is greater. Furthermore, workers under the age of 18 ("young workers") must not perform hazardous work that is likely to jeopardize their health or safety or compromises their education (e.g., night shifts, overtime). [...] Amazon supports the development of legitimate workplace apprenticeship programs that support the students' educational goals, and comply with Amazon's Supplier Code and applicable local laws'. However, no information found about provisions to verify the age of job applicants and workers and remediation programmes. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: How working with suppliers on child labour: The Company also indicates in its Supply Chain Standards Manual: 'We partner closely with our suppliers to drive continuous improvement in working conditions. [...] 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, to learn how to recognize and prevent forced labor, how to comply with wage and working hour requirements, and how to implement management systems'. The MS statement 2021 indicates that 'Amazon joined the Centre for The Child Rights and Business (The Centre) and signed on to support the Joint Action Pledge in 2021 to strengthen the protection of children's rights and accelerate action to address child labour in global supply chains. The Centre offers services and support covering a broad range of child rights and well-being issues including responsible recruitment practices with a focus on child labor prevention and remediation, child rights risks assessments, support packages for young workers and other vulnerable groups, and a comprehensive set of services to create family-friendly workplaces in supply chains and support parent workers'. In this context, the Company also indicates that 'we will work to further extend due diligence, remediation and monitoring activities to increase understanding of child labor in supply chains, deliver programs to support juvenile workers, build capability of suppliers to address child labor, and work collaboratively as a group to share learnings, and establishing best practices to address child labor. However, no evidence found on how this partnership is materializing in specific work with suppliers to improve performance on this issue. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessement of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.2.5.b	Prohibition of forced labour: Recruitment fees and 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"> • Met: Debt and fees rules in codes or contracts: The Company indicates in its Supply Chain Standards the following: 'Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees for their employment either in their home country or the country where work is performed. Suppliers are required to bear or reimburse to their workers the cost of any such fees incurred at any point during the recruitment process, even if outside of the suppliers' direct control of the recruitment process. All fees and expenses charged to workers must be disclosed to Amazon and communicated to workers in their native language in advance of employment or work. Amazon also expects our suppliers to hold their third-party labor agents or brokers to the standards and practices covered by our Supplier Code. Suppliers are required to analyse and monitor the practices of recruitment agencies and labor brokers, and employ agencies that act ethically and in the best interests of workers when contracting labor. Suppliers must ensure that staffing or recruiting agencies comply with our Supplier Code, as well as all applicable laws of the country where work is performed and the worker's home country.' [Supply Chain Standards, 2020: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on debt & fees: The Company reports in its MSA 2020: 'Amazon engaged Verité, a recognized leader in global labor protection, to develop a Responsible Recruitment Guidebook for our Suppliers focused on migrant worker recruitment. The guidebook offers Suppliers guidance on implementing a zero worker-paid recruitment fee policy, instructs Suppliers on how to calculate fee repayment and create an effective reimbursement plan for workers who paid recruitment fees, and provides strategies for engaging responsible labor agents. [...] We believe we can incentivize lasting change by working closely with Suppliers to ensure they pay back recruitment fees owed to workers and training Suppliers on responsible recruitment, including how to identify responsible labor agents for future hiring. Some Suppliers have difficulty identifying if workers have paid recruitment fees and, when found, remediating, particularly if fees are charged to workers by labor contractors in their home countries. We are committed to working with our Suppliers on remediation when recruitment fee issues are identified. For example, a 2020 audit of a Taiwanese Supplier found Vietnamese migrant workers had paid recruitment fees prior to arrival at the factory and continued to pay monthly service fees to the local labor broker. Our regional team shared our Responsible Recruitment Guidebook and worked with the Supplier to develop a comprehensive remediation plan. The Supplier now pays all service fees directly to the local labor broker on behalf of the migrant workers and has been working to calculate and reimburse all affected workers for the fees they already paid. The Supplier is on track to repay all fees to the impacted workers and set up systems to prevent the situation in the future.' [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Met: Analysis of trends in progress made: The Company provides figures in relation to % of audits where the issue 'Worker-paid recruitment fees: Fees related to recruiting and hiring were not disclosed in advance or not reimbursed'. for the years 2019, 2020 and 2021. It also states that 'We accept assessments completed by qualified independent audit firms based on our own assessment standards and those of industry associations, including the Sedex (SMETA), amfori (amfori BSCI), and the Responsible Business Alliance; the certification standard Social Accountability International (SA8000); and the Better Work program'. These type of industry associations work in different sectors. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]
D.2.5.d	Prohibition of forced labour: Wage practices (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"> • Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.2.5.f	Prohibition of forced labour: Restrictions on workers (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"> • Met: Free movement rules in codes or contracts: The Company's Supply Chain Standards: 'All work must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice. [...] Suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working. Suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing. Workers must be given clear, understandable documentation that defines the terms and conditions of their engagement in a language and manner understood by the worker.' [Supply Chain Standards, 2020: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with suppliers on free movement: 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, no further information found describing how the Company actively works with its suppliers on freedom of movement matters. No new evidence found in latest documents. [Modern Day Slavery Statement (website), N/A: amazon.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by retaining docs or restricting movement • Met: Provides analysis of trends demonstrating progress: The Company provides figures in relation to % of audits where the issue 'Control of documents: Employers maintain possession or control over worker identity documents' for the years 2019, 2020 and 2021. It also states that 'We accept assessments completed by qualified independent audit firms based on our own assessment standards and those of industry associations, including the Sedex (SMETA), amfori (amfori BSCI), and the Responsible Business Alliance; the certification standard Social Accountability International (SA8000); and the Better Work program'. These type of industry associations work in different sectors. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]
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"> • Not Met: FoA & CB rules in codes or contracts: The Company indicates in its Supply Chain Standards that it expects that its 'suppliers respect the rights of workers to establish and join an 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, no reference found to collective bargaining. The Company has provided feedback to CHRB regarding this indicator. However, evidence refers to Company's own operations. This indicator looks for evidence of requirements for the supply chain. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on FoA and CB • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.2.7.b	Health and safety: Fatalities, lost days, injury, occupational disease 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"> • Met: Sets out clear Health and Safety requirements: The Company includes health and safety requirements in its Supply Chain Standards, including provisions with respect the following topics: Health and Safety, Occupational Safety; Physically Demanding Work; Emergency Preparedness and Response; Machine Safeguarding; Sanitation and Housing. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] <ul style="list-style-type: none"> • Not Met: Injury Rate or Lost days or Near miss disclosures for last reporting period • Not Met: Fatalities for last reporting period • Not Met: Occupation disease rate for last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provides analysis of trends demonstrating progress
D.2.8.b	Women's rights (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"> • Not Met: Women's rights in codes or contracts

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on women's rights: The Company indicates in its Sustainability Report 2020: 'we are actively working to empower women across dimensions of health, finances, and career development. This includes collaborating with globally recognized programs such as Better Work and, in 2019, beginning an initiative with Business and Social Responsibility's HER project. To date, over 8,000 women in our supply chain are involved in BSR HER project.' [Sustainability Report 2019, 06/2020: sustainability.aboutamazon.com] Score 2 • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provides analysis of trends demonstrating progress
D.2.9.b	Working hours (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"> • Not Met: Working hours in codes or contracts: In its Supply Chain Standards, the Company states that it 'expects suppliers to regularly monitor working hours to ensure the safety, health, and welfare of workers. Except in special or emergency situations, (i) suppliers are required to limit working hours to no 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. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: How working with suppliers on working hours: The Company also indicates in its Supply Chain Standards Manual: 'We partner closely with our suppliers to drive continuous improvement in working conditions. [...] 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, to learn how to recognize and prevent forced labor, how to comply with wage and working hour requirements, and how to implement management systems.' However, the recommended working hour training is an external program. No new evidence found in latest documents. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Met: Provide analysis of trends in progress made: The Company provides figures in relation to % of audits where the issue 'Mandatory overtime: Workers were not provided sufficient notice of overtime in advance or were unable to refuse overtime without penalty, against international standards'. for the years 2019, 2020 and 2021. It also states that 'We accept assessments completed by qualified independent audit firms based on our own assessment standards and those of industry associations, including the Sedex (SMETA), amfori (amfori BSCI), and the Responsible Business Alliance; the certification standard Social Accountability International (SA8000); and the Better Work program'. These type of industry associations work in different sectors. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]

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"> • Not Met: Discloses living wage requirements in supplier code or contracts: The Company requires its suppliers 'to pay their workers in a timely manner and provide compensation (including overtime pay and benefits) that, at a minimum, satisfy applicable laws. [...] In addition, we encourage our suppliers to regularly evaluate whether workers earn enough to meet their basic needs and the needs of their family.' However, the last provision is not a requirement and it does not include a reference to discretionary needs. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: Improving living wage practices of suppliers <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by payment below living wage • Not Met: Provides analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.2	Aligning purchasing decisions with human rights	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"> Met: Avoids business model pressure on HRs (purchasing practices): The Company states on its website: 'We engaged in responsible purchasing practices and learned about impact to workers: Since the beginning of the COVID-19 pandemic, Amazon has honored all orders to our global suppliers from our U.S. and European private-label apparel businesses. We also worked with Better Buying, an initiative working to improve purchasing practices in global supply chains, to conduct a survey of our suppliers in Vietnam and their workers on the impacts of our practices during COVID-19. We received more than 1,300 worker responses, indicating that their primary concerns were unstable personal finances related to business uncertainty during COVID-19, changes to forecasted orders, and factory safety concerns linked to shipment date pressures. Suppliers gave positive feedback on several aspects of our practices, including our increased communication during COVID-19, decisions to honor orders, and flexibility on delivery times.' [Responsible sourcing - progress. Purchasing practices, N/A: sustainability.aboutamazon.com] Not Met: Practices adopted to pay suppliers in line with agreed timeframes Not Met: Review own operations to mitigate negative impact <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Meets all requirements under score 1 Met: Examples of how it assessed, addressed and change purchasing practices: See above [Responsible sourcing - progress. Purchasing practices, N/A: sustainability.aboutamazon.com]
D.4.3	Mapping and disclosing 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"> Met: Identifies direct and indirect suppliers back to manufacturing sites (factories or fields): The modern slavery statement 2020 indicates that 'we publish a map and list of suppliers that produce Amazon-branded apparel, consumer electronics, food and beverage, and home goods products to provide customers and external stakeholders visibility into where we source. The map is updated annually in June and is subject to periodic updates'. It also indicates in the 2021 statement that 'in 2021, we continued to map deeper tiers of our Amazon-branded product supply chains in order to identify the most salient and material risks. Commodity supply chains are complicated and fragmented, and improved visibility into raw material supply chains better enables businesses to identify human rights and labour rights violations and hold suppliers accountable'. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Discloses names and locations of significant parts of SP and why: The Company discloses its Suppliers List on its website: 'The facilities listed produce Amazon-branded apparel, consumer electronics, and home goods products.' The list includes names and addresses. However, it is not clear if this list includes indirect suppliers, as indicated above. [Human rights website, N/A: sustainability.aboutamazon.com] Not Met: Discloses which direct or indirect suppliers is involved in higher-risk activities
D.4.4.b	Prohibition of 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"> Not Met: Child Labour rules in codes or contracts: Its Supply Chain Standards indicates: 'Amazon does not tolerate the use of child labor. Suppliers are required to engage workers who are: (i) 15 years old, (ii) the age of completion of compulsory education, or (iii) the minimum age to work in the country where work is performed, whichever is greater. Furthermore, workers under the age of 18 ("young workers") must not perform hazardous work that is likely to jeopardize their health or safety or compromises their education (e.g., night shifts, overtime). [...] Amazon supports the development of legitimate workplace apprenticeship programs that support the students' educational goals, and comply with Amazon's Supplier Code and applicable local laws'. However, no information found about provisions to verify the age of job applicants and workers and remediation programmes. [Supply Chain Standards, 2020: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with suppliers on child labour: The Company also indicates in its Supply Chain Standards Manual: 'We partner closely with our suppliers to drive continuous improvement in working conditions. [...] 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, to learn how to recognize and prevent forced labor, how to comply with wage and working hour requirements, and how to implement management systems'. The MS statement 2021 indicates that 'Amazon joined the Centre for The Child Rights and Business (The Centre) and signed on to support the Joint Action Pledge in 2021 to strengthen the protection of children's rights and accelerate action to address child labour in global supply chains. The Centre offers services and support covering a broad range of child rights and well-being issues including responsible recruitment practices with a focus on child labor prevention and remediation, child rights risks assessments, support packages for young workers and other vulnerable groups, and a comprehensive set of services to create family-friendly workplaces in supply chains and support parent workers'. In this context, the Company also indicates that 'we will work to further extend due diligence, remediation and monitoring activities to increase understanding of child labor in supply chains, deliver programs to support juvenile workers, build capability of suppliers to address child labor, and work collaboratively as a group to share learnings, and establishing best practices to address child labor. However, no evidence found on how this partnership is materializing in specific work with suppliers to improve performance on this issue. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assesment of number affected by child labour in supply chain • Not Met: Analysis of trends in progress made
D.4.5.b	Prohibition of forced labour: Recruitment fees and 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"> • Met: Debt and fees rules in codes or contracts: The Company indicates in its Supply Chain Standards the following: 'Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees for their employment either in their home country or the country where work is performed. Suppliers are required to bear or reimburse to their workers the cost of any such fees incurred at any point during the recruitment process, even if outside of the suppliers' direct control of the recruitment process. All fees and expenses charged to workers must be disclosed to Amazon and communicated to workers in their native language in advance of employment or work. Amazon also expects our suppliers to hold their third-party labor agents or brokers to the standards and practices covered by our Supplier Code. Suppliers are required to analyse and monitor the practices of recruitment agencies and labor brokers, and employ agencies that act ethically and in the best interests of workers when contracting labor. Suppliers must ensure that staffing or recruiting agencies comply with our Supplier Code, as well as all applicable laws of the country where work is performed and the worker's home country.' [Supply Chain Standards, 2020: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on debt & fees: The Company reports in its MSA 2020: 'Amazon engaged Verité, a recognized leader in global labor protection, to develop a Responsible Recruitment Guidebook for our Suppliers focused on migrant worker recruitment. The guidebook offers Suppliers guidance on implementing a zero worker-paid recruitment fee policy, instructs Suppliers on how to calculate fee repayment and create an effective reimbursement plan for workers who paid recruitment fees, and provides strategies for engaging responsible labor agents. [...] We believe we can incentivize lasting change by working closely with Suppliers to ensure they pay back recruitment fees owed to workers and training Suppliers on responsible recruitment, including how to identify responsible labor agents for future hiring. Some Suppliers have difficulty identifying if workers have paid recruitment fees and, when found, remediating, particularly if fees are charged to workers by labor contractors in their home countries. We are committed to working with our Suppliers on remediation when recruitment fee issues are identified. For example, a 2020 audit of a Taiwanese Supplier found Vietnamese migrant workers had paid recruitment fees prior to arrival at the factory and continued to pay monthly service fees to the local labor broker. Our regional team shared our Responsible Recruitment Guidebook and worked with the Supplier to develop a comprehensive remediation plan. The Supplier now pays all service fees directly to the local labor broker on behalf of the migrant workers and has been working to calculate and reimburse all affected workers for the fees they already paid. The Supplier is on track to repay all fees to the impacted workers and set up systems to prevent the situation in the future.' [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by payment of recruitment fees • Met: Analysis of trends in progress made: The Company provides figures in relation to % of audits where the issue 'Worker-paid recruitment fees: Fees related to recruiting and hiring were not disclosed in advance or not reimbursed'. for the years 2019, 2020 and 2021. It also states that 'We accept assessments completed by qualified independent audit firms based on our own assessment standards and those of industry associations, including the Sedex (SMETA), amfori (amfori BSCI), and the Responsible Business Alliance; the certification standard Social Accountability International (SA8000); and the Better Work program'. These type of industry associations work in different sectors. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]
D.4.5.d	Prohibition of forced labour: Wage practices (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"> • Not Met: Requirement for suppliers to pay workers in full and on time in codes or contracts • Not Met: How working with supply chain to pay workers regularly and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by failure to pay directly • Not Met: Provides analysis of trends demonstrating progress
D.4.5.f	Prohibition of forced labour: Restrictions on workers (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"> • Met: Free movement rules in codes or contracts: The Company's Supply Chain Standards: 'All work must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice. [...] Suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working. Suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing. Workers must be given clear, understandable documentation that defines the terms and conditions of their engagement in a language and manner understood by the worker.' [Supply Chain Standards, 2020: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: How working with suppliers on free movement: 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, no details found describing how the Company actively works with its suppliers on freedom of movement matters. No new evidence found in latest documents. [Modern Day Slavery Statement (website), N/A: amazon.co.uk] Score 2 • Not Met: Assessment of the number affected by retaining docs or restricting movement • Met: Provides analysis of trends demonstrating progress: The Company provides figures in relation to % of audits where the issue 'Control of documents: Employers maintain possession or control over worker identity documents' for the years 2019, 2020 and 2021. It also states that 'We accept assessments completed by qualified independent audit firms based on our own assessment standards and those of industry associations, including the Sedex (SMETA), amfori (amfori BSCI), and the Responsible Business Alliance; the certification standard Social Accountability International (SA8000); and the Better Work program'. These type of industry associations work in different sectors. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]
D.4.6.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"> • Not Met: FoA & CB rules in codes or contracts: The Company indicates in its Supply Chain Standards that it expects that its 'suppliers respect the rights of workers to establish and join an 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, no reference found to collective bargaining. The Company has provided feedback to CHRB regarding this indicator. However, evidence refers to Company's own operations. This indicator looks for evidence of requirements for the supply chain. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: How working with suppliers on FoA and CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of the number affected by restrictions to FoA and CB in the SP • Not Met: Provides analysis of trends demonstrating progress
D.4.7.b	Health and safety: Fatalities, lost days, injury, occupational disease 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"> • Met: Sets out clear Health and Safety requirements: The Company includes health and safety requirements in its Supply Chain Standards, including provisions with respect the following topics: Health and Safety, Occupational Safety; Physically Demanding Work; Emergency Preparedness and Response; Machine Safeguarding; Sanitation and Housing. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: Injury rate disclosures and lost days (or near miss disclosures) for the last reporting period • Not Met: Fatalities disclosures for lasting reporting period • Not Met: Occupational disease rates for the last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: How working with suppliers on H&S • Not Met: Assessment of the number affected by H&S issues in the SP • Not Met: Provide analysis of trends in progress made
D.4.8.b	Women's rights (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"> • Not Met: Women's rights in codes or contracts

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: How working with suppliers on women's rights: The Company indicates in its Sustainability Report 2020: 'we are actively working to empower women across dimensions of health, finances, and career development. This includes collaborating with globally recognized programs such as Better Work and, in 2019, beginning an initiative with Business and Social Responsibility's HER project. To date, over 8,000 women in our supply chain are involved in BSR HER project.' [Sustainability Report 2019, 06/2020: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment on the number affected by discrimination or unsafe working conditions • Not Met: Provide analysis of trends in progress made
D.4.9.b	Working hours (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"> • Not Met: Working hours in codes or contracts: In its Supply Chain Standards, the Company states that it 'expects suppliers to regularly monitor working hours to ensure the safety, health, and welfare of workers. Except in special or emergency situations, (i) suppliers are required to limit working hours to no 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. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] • Not Met: How working with suppliers on working hours: The Company also indicates in its Supply Chain Standards Manual: 'We partner closely with our suppliers to drive continuous improvement in working conditions. [...] 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, to learn how to recognize and prevent forced labor, how to comply with wage and working hour requirements, and how to implement management systems.' However, the recommended working hour training is an external program. No new evidence found in latest documents. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of number affected by excessive working hours • Met: Provide analysis of trends in progress made: The Company provides figures in relation to % of audits where the issue 'Mandatory overtime: Workers were not provided sufficient notice of overtime in advance or were unable to refuse overtime without penalty, against international standards'. for the years 2019, 2020 and 2021. It also states that 'We accept assessments completed by qualified independent audit firms based on our own assessment standards and those of industry associations, including the Sedex (SMETA), amfori (amfori BSCI), and the Responsible Business Alliance; the certification standard Social Accountability International (SA8000); and the Better Work program'. These type of industry associations work in different sectors. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]
D.4.10.a	Responsible mineral sourcing: Arrangements with suppliers and smelters/refiners in the mineral resource supply chains	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"> • Not Met: Due diligence in accordance with OECD Guidance in supplier contracts: The Company's Supply Chain Standards 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 OECD Guidance. The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [Supply Chain Standards, 2020: sustainability.aboutamazon.com] & [California Supply Chain Transparency Act Statement, N/A: amazon.com] • Not Met: Works with smelters/refiners and suppliers to build capacity <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Contractual requirement to disclosure smelter/refiner information • Not Met: Contractual requirement covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.10.b	Responsible mineral sourcing: Risk identification and responses in mineral 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"> • 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 (see below). Additionally, the Company 'communicated with each of our suppliers to confirm the accuracy of the information provided in their most recent template'. No further details found, including risks identified. No new evidence found in latest review. The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. [Conflict minerals report FY2019, 2020: s2.q4cdn.com] • Met: Identification of smelter/refiners and OECD Guidance: In its Conflict Minerals Report 2018, 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. [...] 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 facilities that comply with a responsible mineral sourcing validation program in order to determine whether the smelter or refiner that processed those minerals had been audited by an independent third party. We actively reviewed and discussed our policy regarding gold, tin, tungsten, and tantalum with each supplier unable to determine the origin of gold, tin, tungsten, or tantalum and we will continue evaluating the results of their efforts'. [Conflict minerals report FY2019, 2020: s2.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners judged in line with OECD Guidance: Although the Company provides a list of smelters/refiners, it is not clear 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. No new evidence found in latest review. [Conflict minerals report FY2019, 2020: s2.q4cdn.com] • Not Met: Risk identification and disclosure covers all minerals
D.4.10.c	Reporting on responsible sourcing of minerals	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"> • Not Met: Describes mineral risk management plan for supply chain: The Company indicates that 'In 2021, we increased our support for industry collaboration towards responsible mineral sourcing. We remain members of the Public-Private Alliance for the Responsible Minerals Trade (PPA) and the Responsible Minerals Initiative (RMI), and enhanced our cobalt due diligence program using the RMI's cobalt reporting template. We also supported RMI's Smelter Audit Fund to increase assessments for tin, tungsten, tantalum, and gold smelters. These assessments are critical to responsible mineral sourcing in our supply chains. In 2022, we will implement additional smelter due diligence protocols as we work towards 100% of tin, tungsten, tantalum, and gold mineral smelters and refiners in our supply chain certified using a recognized minerals assurance program. However, actual evidence is not clear about the measures the Company is already implementing to manage and respond to risks beyond the 'enhanced our cobalt due diligence program using the RMI's cobalt reporting template'. Rest of the evidence seems to partnership collaboration and future plans. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: Monitoring, tracking and whether better risk prevention/mitigation over time • Not Met: Disclose better risk prevention/mitigation over time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Suppliers and stakeholders engaged in risk management strategy • Not Met: Risk management and response processes cover all minerals

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"> • Area: FoA/CB • Headline: Amazon accused of interfering with its warehouse workers' unionizing effort in Alabama and union busting in the USA and Europe • Story: On February 9, 2021, The Financial times reported that a group of more than 70 of Amazon's investors, including Folksam and Ohman Fonder, the comptrollers for both New York State and New York City, Legal and General Investment Management, BMO Global Asset Management and the Church of England Pensions Board, called upon the Company to stop interfering with efforts by its workers to unionize ahead of a vote in Alabama. Thousands warehouse workers at an Amazon plant in Bessemer, Alabama, were sent ballots by mail, on February 8, to decide over the next seven weeks if they want to join the Retail, Wholesale and Department Store Union (RWDSU). <p>In their letter, the group of investors called upon Amazon to end its union-busting and remain “neutral”. They added that Amazon appeared to be going against its own Global Human Rights Principles which state it respected “employees’ right to join, form, or not to join a labour union or other lawful organisation of their own selection, without fear of reprisal, intimidation, or harassment”. This comes amid reports that Amazon had an anti-union campaign through posters, text messages and compulsory meetings during working hours. A website has also been set up to advise workers that unionization, DoltWithoutDues.com, that outlined what it considered to be the downsides of joining a union.</p> <p>On April 19, 2021, the Wall Street Journal reported that Retail, Wholesale and Department Store Union (RWDSU) has filed challenges over the unionisation vote with the National Labour Relations Board (NLRB) alleging that Amazon violated legal restrictions throughout the election, that sought to establish union representation at the Company’s warehouse Bessemer, Alabama. More than 70% of workers who cast ballots in the election voted against joining the RWDSU.</p> <p>In its objections filed with the NLRB, the union alleged that Amazon intimidated and threatened employees into voting against unionising. The union cited meetings that the Company held with workers and a mailbox installed outside of the warehouse. According to the union complaint, Amazon threatened employees with the loss of jobs or closing of the warehouse as well as possible loss of compensation and benefits, if the union were approved. The union also accused the Company of targeting workers who asked questions at meetings by removing them from the gatherings, potentially scaring other employees. The filing also accuses Amazon of electioneering by displaying a Company campaign message near the mailbox.</p> <p>The union seeks to set aside the election results, which concluded April 9, and have it held again. The National Labour Relations Board, which conducted the election, is expected to review the complaint before it decides whether to certify the results. The NLRB could hold a hearing to go over the objections and hear the testimony.</p> <p>Already in September, 2020, it was reported by Business and Human Rights Resource Centre that several multinational corporations were accused of hiring law firms and consultants known for their ‘union avoidance’ expertise in order to undermine unionisation efforts among workers in the United States. These firms include Ogletree Deakins, Littler Mendelson, and Jackson Lewis. According to the Director of Labour Education Research at Cornell University, companies spend as much as USD 340 million a year on such services. The advice allegedly offered by the law firms and consultants included using surveillance to monitor and mitigate the likelihood of unionisation, billboard campaigns to dissuade workers from joining unions, and scare tactics such as captive-audience meetings. Companies accused of adopting such tactics include: HCA Healthcare, Volkswagen, IKEA, Google, Amazon, Nissan, Delta Air Lines, and Rite Aid. Labour rights advocates criticised these companies for undermining the fundamental right to freedom of association. Furthermore, European companies have been accused of exploiting</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>the weaknesses of US federal labour laws to undermine workers' rights in ways they would not in Europe.</p> <p>On May 31, 2021, media sources reported an increased scrutiny over Amazon's treatment of workers, following which the European Parliament (EP) called on the Company's chief executive Jeff Bezos to testify before its Employment and Social Affairs Committee. According to a Uni Global Union spokesperson, the Company is accused of attempting to impose its conflictual labour model on working people across Europe and undermining people's ability to negotiate collectively to have a say over the decisions that shape their working lives. Other claims included the surveillance of workers, poor working conditions in Europe and everywhere else the company operates.</p> <p>On April 2021, Amazon illegally retaliated against two of its most prominent internal critics when it fired them, the National Labour Relations Board has reported. The two employees had publicly pushed the Company to reduce its impact on climate change and address concerns about its warehouse workers.</p> <p>On October 2020, 37 members of the European Parliament (MEPs) submitted a letter to the company's CEO calling for urgent action in response to labour unions' demands for a euro-wide investigation into what they claim is a 'breach of European labour, data and privacy laws' by Amazon. The MEPs expressed concerns about whether European trade unions, as well as local, national, or European elected representatives, are affected by this approach to 'threat monitoring,' which aims to repress collective action and trade union organizing. Amazon workers demanded the Company to cease these practices immediately and to talk about how to make their jobs better instead of ignoring their calls and suppressing their rights.</p> <p>[AlterNet, 12/02/2021, "Amazon is fighting hard to stop warehouse workers from unionizing": alternet.org] [Financial Times, 09/02/2021, "Amazon must not interfere with US union effort, say investors": ft.com] [The Wall Street Journal, 19/04/2021, "Union Appeals Amazon Election in Alabama, Says Company Violated Laws": wsj.com] [The Conversation, 24/08/2020, "The labor-busting law firms and consultants that keep Google, Amazon and other workplaces union-free": theconversation.com]</p>
E(1).1	The company has responded publicly to the allegation	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"> Met: Public response: Amazon reportedly stated that it is complying to the rules of the National Labor Relations Board. The company was cited, stating "We have provided education that helps employees understand the facts of joining a union [...] If the union vote passes, it will impact everyone at the site and it's important associates understand what that means for them and their day-to-day life working at Amazon." [Financial Times, 09/02/2021: ft.com] <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Detailed response: In its 2020 Sustainability Report (People), Amazon stated that it respects the freedom of association of its employees. It added that the vote organized by the NLRB resulted against forming a union. Amazon stated, "We value worker feedback, and are committed to providing our employees with grievance mechanisms and remedial action, regardless of collective bargaining presence. We firmly believe it is in the best interests of our employees and our company to continue our direct communications, and the best way to effect positive change is for our employees and managers to continue working together directly. We work hard to listen to our employees, make continuous improvements, and invest heavily to offer competitive pay and benefits in a safe and inclusive workplace." However, it did not address any of the unionbusting actions it has been accused of. <p>The company provided a feedback for this datapoint. However, in its feedback, Amazon only addressed the situation at the Staten Island plant and made no mention whatsoever of the situation at the Bessemer, Alabama plant.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Furthermore, Amazon did not address several aspects of the allegations, including having threatened employees with loss of jobs or closure of the warehouse, as well as the possible loss of compensation and benefits if the union was approved; [Business and Human Rights Resource Centre,06/06/2022, "Amazon's Response": business-humanrights.org] [Sustainability Report 2019, 06/2020: sustainability.aboutamazon.com]
E(1).2	The company has investigated and 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"> • Not Met: Engaged with stakeholders: On 23 December 2021, Amazon entered a settlement with the NLRB. Part of the settlement was to notify its employees of their rights to organize and form unions. As of March 2022, there is no clear evidence on whether Amazon has begun implementing the terms of its agreements with the NLRB. [The Verge, 23/12/2021, "Amazon's nationwide NLRB settlement makes it easier for workers to organize": theverge.com] • Not Met: Identified cause: In its 2020 Annual Report, Amazon stated that reports of it mistreating its employees are inaccurate. The company goes on to explain that it allows informal breaks for workers and do not set unreasonable performance goals. However, the company did not provide any evidence to substantiate these claims and did not present any investigative results on the underlying causes of the events concerned. [Annual report 2020, 2021: s2.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: Please see data point E(1).2.S1.A [The Verge, 23/12/2021: theverge.com] • Not Met: Stakeholder input to steps taken: Please see data point E(1).2.S1.A [The Verge, 23/12/2021: theverge.com]
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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"> • Not Met: Provided remedy: The company has committed to providing remedy by stating that it will notify workers of their rights to unionize. However, no reports have emerged on whether the company has begun notifying its employees. [The Verge, 23/12/2021: theverge.com] • Not Met: Evidence for lack of Impact or link: In its 2020 Annual Report, Amazon stated that reports of it mistreating its employees are inaccurate. The company goes on to explain that it allows informal breaks for workers and do not set unreasonable performance goals. However, the company did not provide any evidence to substantiate these claims. <p>Although Amazon claims that they treat their workers fairly and with care, reports of poor working conditions and failing to respect worker privacy at its facility in Bessemer continue to emerge, as of March 2022. [The Guardian, 12/01/2022, "Amazon warehouse workers have chance to form union next month": theguardian.com] [NPR, 04/02/2022, "Amazon warehouse workers in Alabama vote for second time in union effort": npr.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: While workers have been permitted to hold a second vote for unionization due to the ruling of the NLRB, there has been no clear statements acknowledging that the second vote is satisfactory form remediation by Amazon. [NPR, 04/02/2022: npr.org] • Not Met: Remedy delivered: Although second unionization vote is schedule to take place in March 2022, Amazon has yet to make public any changes to its worker representation or grievance mechanism policies. Please also see data point E(1).2.S1.A. [NPR, 04/02/2022: npr.org] [The Verge, 23/12/2021: theverge.com] • Not Met: Independent remedy process used: The NLRB which entered into a settlement with Amazon and previously found it to have wrongly pressured its workers to vote against unionization has yet to acknowledge that Amazon has begun the terms of its settlement agreement. [NPR, 29/11/2021, "Amazon warehouse workers get to re-do their union vote in Alabama": npr.org]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Health & Safety • Headline: COVID-19. Amazon accused of negligence in the response to the virus in the US

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>• Story: "On May 5, 2021, media sources reported that the California Division of Occupational Safety and Health Agency (Cal/OSHA) has Fined Amazon USD 41,000 over its failure to record COVID-19 infections among employees at a Rialto facility and to generally protect workers there against potential exposure to the virus.</p> <p>Investigators with Cal/OSHA found that LGB7, an Amazon fulfilment centre in Rialto, didn't implement adequate physical distancing, face coverings and physical barriers such as Plexiglas screens that would help block infectious particles. According to the agency's citation, Amazon failed to record 217 COVID-19 infections among employees from April to October 2020. State occupational health and safety laws require employers to document all workplace illnesses and injuries in a record called Log 300 that is supposed to be available to workers on request.</p> <p>On March 22, 2020, several media outlets reported that there have been protests at Amazon warehouses in the US after the Company tried to run normal shifts despite positive cases of Covid-19. In New York, a facility was cleared out for deep cleaning after an employee tested positive for the virus. However, activists said the Company had attempted the next day to begin the 6:45am shift as usual but workers had walked out.</p> <p>On May 16, 2020, the Canadian Broadcasting Corporation (CBC) reported that a vice president at Amazon Web Services, an Amazon subsidiary, resigning to support three employees allegedly fired for criticizing the risks and working condition in the Company's warehouses amid the COVID-19 pandemic. Two of the employees sent an internal email to outlining concerns from warehouse workers. The email also included a link to a petition to support workers' demands for paid sick leave, hazard pay and other benefits. Shortly after the employees were fired for violating the Amazon's internal policies, according to the Company. The third alleged firing concerns a critic of the Company's warehouse conditions in the pandemic, on grounds that he put others at risk by violating his paid quarantine when he joined a demonstration at Amazon's Staten Island fulfilment centre. This case is being investigated by New York's Attorney General.</p> <p>On July 17, 2020, UNI Global Union reported that Amazon had made changes to its COVID-19 safety policy, allowing workers to take extra time to wash their hands during the coronavirus pandemic without being punished, following the lawsuit filed by workers over claims that the Company prevented them from adequately washing their hands or sanitizing their workstations. The changes were announced the day before a scheduled court hearing to decide whether Amazon should be immediately forced to change its safety procedures. This took place after a lawsuit was filed on June 3, 2020 on behalf of six workers, in the U.S. District Court in Brooklyn, claiming that workers ""were explicitly or implicitly encouraged to continue attending work and prevented from adequately washing their hands or sanitizing their workstations." While Amazon claims that it relaxed rules about how much time workers could take away from their stations to wash their hands. Amazon's lawyer said the ""Time off task"" policy had been in place since March. The workers suing Amazon claim they were never told about the new rules and have been skipping safety measures like frequent hand-washing in order to ship out more packages.</p> <p>On February 17, 2021, Reuters reported that the New York Attorney General filed a lawsuit against Amazon over its handling of worker safety issues around the COVID-19 pandemic at two warehouses, at a Staten Island fulfilment centre and a Queens distribution centre. In a complaint filed in a New York state court in Manhattan, the New York Attorney General accused Amazon of "flagrant disregard" of steps needed to protect workers from the coronavirus. Amazon is also facing allegations of illegally retaliating against employees that complained about the Company's handling of the COVID-19 pandemic, including in March 2020 when Amazon was accused of firing activist Christian Smalls for leading a protest over conditions at the Staten Island warehouse, while the Company stated that the dismissal was due to violating a paid quarantine by attending the protest. Amazon has filed its own lawsuit in Brooklyn federal court to stop the New York</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Attorney General from suing. In its lawsuit, the Company argued that federal labour and safety laws took precedence over New York's in addressing workplace safety."</p> <p>[Los Angeles Times, 04/05/2021, "Amazon warehouse in Rialto fined \$41,000 for coronavirus safety violations: latimes.com] [Business Insider, 14/07/2020, "Amazon said it lets warehouse workers wash their hands and miss quotas without being penalized. Workers suing the company say they were never told.": businessinsider.com] [Reuters, 17/02/2021, "New York attorney general sues Amazon over COVID-19 shortfalls": reuters.com]</p>
E(2).1	The Company has responded publicly to the allegation	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"> Met: Public response: With reference to the allegation that Amazon failed to record COVID-19 infections in a Rialto fulfilment centre in California, US, and generally protect workers against exposure to the virus Amazon provided a public response, both to the initial allegations and to the subsequent lawsuit and fine of USD 41,000 (here, Amazon responded publicly to contest the citation). <p>With reference to the allegation of unsafe working conditions and resulting protests in the New York, US, Amazon provided a public response to contest the allegation that workers were fired because of their role in organising the protests, and on the safety measures the company was taking. With reference to the subsequent lawsuit brought against Amazon by the New York, USA, Attorney General (AG) for alleged inadequate worker safety issues and illegal retaliations, Amazon provided a public response and counter-sued by lodging a complaint against the AG.</p> <p>In the Brooklyn case amazon responded "We don't believe the Attorney General's filing presents an accurate picture of Amazon's industry-leading response to the pandemic" [Los Angeles Times, 2/4/2020, "Employees at 6 Amazon facilities in Southern California have tested positive for coronavirus": latimes.com] [Los Angeles Times, 4/5/2021: latimes.com] [Los Angeles Times, 14/4/2020, "Amazon fires 3 more employees who criticized working conditions": latimes.com] [BBC, 17/2/2021, "Amazon sued by New York over 'deficient' Covid-19 response": bbc.co.uk]</p> <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Detailed response: With reference to the alleged negligent response to the COVID-19 virus at a fulfilment centre in Rialto, California, US, Amazon addressed the initial allegation in a public response ("In a statement, Amazon said that all employees diagnosed with COVID-19 or directed to quarantine will receive up to two weeks of pay to ensure they can self-isolate without worrying about lost income ... The company said it had informed other employees at the affected sites about each case. At ONT2 in San Bernardino and LGB8 in Rialto, employees were informed via pre-recorded voice messages from their managers.") With reference to the subsequent lawsuit by the California Division of Occupational Safety and Health Agency (Cal/OSHA), and allegation that Amazon had failed to log cases, and resulting fine of USD 41,000, Amazon responded publicly to contest the finding that Amazon failed to protect against exposure to the virus. ("Amazon spokeswoman Maria Boschetti said the company follows regulations, takes the health and safety of its employees seriously, and will contest the citation. "We believe our health and safety programs are more than adequate," Boschetti said in an emailed statement. Boschetti said Amazon committed \$11.5 billion last year to COVID-related initiatives to help keep employees safe, including temperature checks, cleanings and testing. The measures include training that spans "onboarding for new hires to constant reminders, dedicated safety ambassadors, and ... communication about safety protocols."). However, Amazon's response is general, rather than addressing the specific alleged deficiencies (e.g., lack of physical distancing and physical barriers) and the alleged failure to record cases and notify workers in specific fulfilment centres. <p>After having reached a settlement with California's attorney general over the claims, Amazon spokesperson Barbara Agrait said there were no changes to the company's protocols as they were "glad to see this resolved and to see that the AG found no substantive issues with safety measures."</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>(6) With reference to alleged unsafe working conditions in New York, US, the evidence available indicates that Amazon initially provided only general information on precautions taken ("Amazon previously told Business Insider that it has made more than 150 changes to its warehouse procedures and claimed that infection rates at its Staten Island facility are lower than in the community generally (though it did not provide any evidence to support that claim). It has also said it respects the right of workers to protest.") Amazon also addressed the related allegation that it illegally retaliated against a worker (by firing him) because of his role in organising the protests ("Amazon defended the action. It said the worker, Christian Smalls, had received a warning about social distancing rules and was supposed to stay home after coming in contact with an infected colleague. "Despite that instruction to stay home with pay, he came onsite ... further putting the teams at risk," a spokesperson said, adding that just 15 of the more than 5,000 people who work at the New York facility participated in the protest.") With reference to the subsequent allegation of illegal retaliations (that 3 workers were fired for criticising the risks and working conditions in New York fulfilment centres) Amazon contested this allegation: "Amazon said the two employees at its headquarters had been fired for violating its policy prohibiting employees from speaking publicly about company matters. "We support every employee's right to criticize their employer's working conditions, but that does not come with blanket immunity against any and all internal policies," the company said in an emailed statement. "We terminated these employees for repeatedly violating internal policies." Amazon on Tuesday also confirmed it had dismissed Mohamed. Kristen Kish, a company spokeswoman, said Amazon respected his right to protest. "This individual was terminated as a result of progressive disciplinary action for inappropriate language, behavior and violating social distancing guidelines."). With reference to the subsequent lawsuit brought against Amazon by the New York Attorney General (AG) for alleged inadequate worker safety issues and illegal retaliations, Amazon filed a counter lawsuit against the AG in which it reportedly addressed the specific allegations ("Amazon last week attempted to block the lawsuit with its own legal action. It said Ms James was applying "an inconsistent and unfair" standard. "We care deeply about the health and safety of our employees, as demonstrated in our filing last week, and we don't believe the Attorney General's filing presents an accurate picture of Amazon's industry-leading response to the pandemic," spokeswoman Kelly Nantel said in a statement. "In its complaint last week, Amazon said Ms James lacked oversight over the workplace issues, which it said are governed by national labour laws." Thereby, with reference to the allegation of unsafe working conditions and resulting protests in the New York, the company responded to the allegation in detail.</p> <p>However, as above clarified, the company did not address all aspects of the allegation of negligence in the response to the virus in the US. [Los Angeles Times, 4/5/2021: latimes.com] [CNBC, 15/09/2021, "Amazon settles with California over claims it concealed Covid-19 cases from warehouse workers": cnbc.com] [Business Insider, 4/6/2020, 3 "Amazon employees in New York have sued the company over claims that its lax safety policies were responsible for them becoming infected with COVID-19": businessinsider.com] [BBC, 17/2/2021: bbc.co.uk]</p>
E(2).2	The Company has appropriate policies in place	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: Amazon reached a settlement with California's attorney general over the claims it concealed Covid-19 cases from warehouse workers. The company agreed to notify warehouse workers within one day of new Covid cases, as well as provide the exact number of cases in their workplace. Amazon will also notify local health agencies within 48 hours of new Covid cases and pay \$500,000 toward additional enforcement of California consumer protection laws, California State Attorney General Rob Bonta said. However, the Attorney General cannot be considered a representative of the stakeholders. <p>In general, there is no evidence available that Amazon engaged with the affected stakeholders or their legitimate representatives with respect to the above sub-allegations to identify a cause of the alleged impacts.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Amazon provided a feedback for this datapoint, by referring to its covid blog and its recent modern slavery statement. However, the information provided in these documents was found to be not material for the assessment of this indicator. [CNBC, 15/09/2021: cnbc.com] [Amazon's COVID-19 blog, N/A: aboutamazon.com] & [Modern Slavery Statement 2021, 2022: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: There is no evidence available that Amazon has identified a cause of the allegations. <p>Amazon provided a feedback for this datapoint, by referring to its covid blog and its recent modern slavery statement. However, the information provided in these documents was found to be not material for the assessment of this indicator. [Amazon's COVID-19 blog, N/A: aboutamazon.com] & [Modern Slavery Statement 2021, 2022: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: Amazon has provided general statements on how it has introduced improvements to worker safety during COVID-19. For example, “So far in 2020, we have committed over \$1B in new investments in operations safety measures, ranging from technology investments in safety to masks, gloves, and the enhanced cleaning and sanitization required to protect employees from the spread of Covid-19,” spokesperson Rachael Lighty said in the email. She said the company has seen improvements through an array of programs inside its warehouses, such as installing guardrails to separate forklifts from pedestrians, increasing safety staffing and offering wellness exercises”; and, “In a statement to POLITICO detailing its coronavirus response, an Amazon spokesperson said the firm had increased cleaning at all facilities, cancelled non-critical meetings and introduced social distancing measures including removing or spacing out furniture at warehouses and staggering employees' breaks, in addition to encouraging them to wash their hands. The firm has also pledged to give employees who are diagnosed with coronavirus or placed in quarantine up to two weeks of pay....“). <p>In its settlement with California’s attorney general, the company agreed to notify warehouse workers within one day of new Covid cases, as well as provide the exact number of cases in their workplace. Amazon will also notify local health agencies within 48 hours of new Covid cases and pay \$500,000 toward additional enforcement of California consumer protection laws, California State Attorney General Rob Bonta said. However, there is no available evidence that the company implemented those improvements.</p> <p>Amazon provided feedback for this datapoint, by referring to its covid blog and its Modern Slavery Statement 2021. In both these sources, a number of measures taken by Amazon to ensure the health and safety of workers in the face of COVID-19 are listed, but there is no reference to the events reported in the allegations, nor is there any evidence available that these actions are in response to the specific allegations and that the actions taken address specific alleged impacts. As a result, the information provided by the company does not change the assessments given for the datapoint considered. [Reveal, 29/9/2021, “How Amazon hid its safety crisis”: revealnews.org] [Politico, 20/3/2020, "This is crazy: Rage boils over at Amazon sites over coronavirus risks": politico.eu] [CNBC, 15/09/2021: cnbc.com] [Amazon's COVID-19 blog, N/A: aboutamazon.com] & [Modern Slavery Statement 2021, 2022: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken
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"> • Not Met: Provided remedy: There is no evidence available that Amazon has provided a remedy to affected stakeholders. The company has been ordered to pay a fine in some cases (see above), but there is no evidence that this has been to remediate alleged impacts suffered by workers. • Not Met: Evidence for lack of Impact or link: Amazon disputes the allegations of its inadequate response to the COVID-19 virus. In its responses, the company has provided information on steps the company taken to mitigate the risks. However, the evidence available indicates that Amazon has not provided data or evidence to substantiate the company’s claims that it is not linked to any of the impacts

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>alleged. [Business Insider, 4/6/2020, "3 Amazon employees in New York have sued the company over claims that its lax safety policies were responsible for them becoming infected with COVID-19": businessinsider.com] [TheMarkUp, 10/2/2022, "Data Provided by Amazon Workers Offers Rare Glimpse into COVID Cases in California Warehouses": themarkup.org] [Covid-19 Response 'How we're taking care of employees during COVID-19', 03/02/2021: aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used: An independent state body (the California Division of Occupational Safety and Health Agency) investigated the allegations against Amazon. However, Amazon was held to have violated the law (i.e. no conclusion that the company was not directly linked to the alleged impacts), although this is contested by the company. Further, there is no evidence available that the processes have led to a remedy for affected stakeholders. There is no evidence available that Amazon engaged in an independent process in any of the other sub-allegations.
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Area: Health & Safety • Headline: COVID-19. Amazon accused of negligence in the response to the virus in Europe • Story: On March 22, 2020, several media outlets reported that there have been protests at Amazon warehouses in the US, France, Poland, Spain and Italy after the Company tried to run normal shifts despite positive cases of Covid-19. In New York, a facility was cleared out for deep cleaning after an employee tested positive for the virus. However, activists said the Company had attempted the next day to begin the 6:45am shift as usual but workers had walked out. Amazon's Italian logistics hub in Castel San Giovanni called for a strike, accusing the Company of endangering their health and safety. In a joint statement, the Cisl, Cgil, Uil and Ugl unions accused Amazon of failing to implement additional worker protection measures with the Italian government agreed on with unions. <p>Spanish union Comisiones Obreras (CC.OO) has lodged an official complaint to labor authorities about Amazon's response to the crisis, and in Poland unionized workers voiced their concerns over their working conditions.</p> <p>On March 19, Reuters also reported that several hundred Amazon's employees protested in France calling on the Company to halt operations during the pandemic or allow staff to take up a French right to walk out on full pay if they are endangered at work, amid fears coronavirus contamination. France's Finance Minister said that Amazon's workers in France are coming under unacceptable pressure after staff complained they are facing the threat of not getting paid if they stopped coming to work. The protest came amid concerns about the measures to protect staff taking by the companies that remained operational in France. On April 15, 2020, Amazon closed its warehouses in France after a court temporarily forbid the Company from shipping nonessential goods because of the risk to workers from the coronavirus. The court ruled that Amazon has not taken enough measures to protect its workers from being infected. The decision came after a court in Nanterre, Paris, issued an emergency ruling requiring the Company to stop selling non-essential goods for a month while it works out new safety measures. The court ordered Amazon to limit its activity to health, hygiene and food products within 24 hours. Under the ruling, Amazon would have to pay EUR 1 million for each day of noncompliance.</p> <p>[Business and Human Rights Resource Centre, 31/03/2020, "Amazon workers in France, Italy, Spain & Poland strike over labour conditions during COVID-19 pandemic": business-humanrights.org]</p>
E(3).1	The Company has responded publicly to the allegation	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"> • Met: Public response: With reference to the alleged unsafe working conditions in France, Amazon provided a public response to the protests and, with reference to the subsequent court order against Amazon in France, Amazon responded publicly to contest the ruling.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>With reference to the alleged unsafe working conditions in Poland, there is no available information in English as to whether Amazon provided a public response. However, Amazon provided a public statement to Politico about its response to coronavirus.</p> <p>With reference to the alleged unsafe working conditions in Spain and complaint brought by the Spanish Union Spanish union Comisiones Obreras (CC.OO), Amazon provided a public response by way of official statement.</p> <p>With reference to the alleged unsafe working conditions in Italy, Amazon provided a public response both to the media and to Business & Human rights Resource Centre. [Reuters, 19 March 2020, "French Amazon workers protest in coronavirus pushback": reuters.com] [Politico, 20/3/2020, This is crazy: Rage boils over at Amazon sites over coronavirus risks: politico.eu] [Expansion, 17/3/2020, Amazon sube el sueldo a sus empleados de logística en España por su exposición al coronavirus: expansion.com] [DW.com, Amazon workers in Italy go on strike, 22/3/2021: dw.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: With reference to the allegations in France, Amazon's response addressed the allegation of inadequate protections ("Amazon said it was adhering to all sanitary guidelines, adding that it was prioritizing and making space in warehouses for key products such as household staples and hygiene or medical supplies as online demand soars globally."). However, the company did not address the specific allegations at specific centres (Amazon, "declined to comment on the situation at Saran and in other French centers.") <p>With reference to the subsequent court order against Amazon in France, Amazon responded publicly to contest the ruling, but its response did not address the alleged unsafe working conditions, only the closure of its warehouses ("We have suspended activities in our distribution centers in France, despite the huge investment we have made to ensure and strengthen safety measures for our employees," Amazon said in a statement, adding that it was "perplexed" by the court's decision.")</p> <p>With reference to the alleged unsafe working conditions in Poland, Amazon did not provide a response specifically on the situation in Poland.</p> <p>With reference to protests in Spain and the complaint brought by the Spanish Union Comisiones Obreras (CC.OO), Amazon responded only in general terms that the company is applying preventative measures.</p> <p>With reference to the protests in Italy, Amazon addressed the alleged link between working conditions and the protests. ("An Amazon spokesperson gave a much lower number of participants, saying that fewer than 10% the company's employees in Italy took part in Monday's action. "We employ 9,500 people in Italy. The vast majority of our employees did what they do every day, they came to work to deliver for their customers. Any suggestion to the contrary is just plain wrong," spokesperson Stuart Jackson told DW." Amazon's Italy manager Mariangela Marseglia has said the company offers "a safe, modern and inclusive workplace, with competitive salaries that are some of the highest in the industry, benefits and great opportunities for career growth."). However, the response did not address the allegations of unsafe working conditions related to the Covid-19 virus. [Business & Human Rights Resource Centre, Amazon responded: business-humanrights.org] [Reuters, 19 March 2020, "French Amazon workers protest in coronavirus pushback": reuters.com] [Politico, 20/3/2020, This is crazy: Rage boils over at Amazon sites over coronavirus risks: politico.eu] [Expansion, 17/3/2020, Amazon sube el sueldo a sus empleados de logística en España por su exposición al coronavirus: expansion.com]</p>
E(3).2	The Company has appropriate policies in place	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"> • Not Met: Engaged with stakeholders: The evidence available indicates that, with reference to allegations in Poland, Amazon did engage with the trade unions. However, this is reportedly with respect to pay rather than safe working

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>conditions. There is no evidence available that Amazon engaged with the affected stakeholders or their legitimate representatives with respect to the above sub-allegations to identify a cause of the alleged impacts.</p> <p>Amazon provided feedback for this datapoint, by referring to its covid blog and its Duty of Vigilance Plan 2021. However, the information provided in these documents is not material for the assessment of this indicator. [Politico, 20/3/2020, This is crazy:’ Rage boils over at Amazon sites over coronavirus risks: politico.eu] [Amazon's COVID-19 blog, N/A: aboutamazon.com] & [Duty of Vigilance Plan 2021, 06/2022: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: There is no evidence available that Amazon has identified a cause of the allegations. <p>Amazon provided feedback for this datapoint, by referring to its covid blog and its Duty of Vigilance Plan 2021. However, the information provided in these documents is not material for this indicator. [Amazon, 04/03/2022: aboutamazon.com] [Amazon's COVID-19 blog, N/A: aboutamazon.com] & [Duty of Vigilance Plan 2021, 06/2022: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: In a statement to POLITICO detailing its coronavirus response, an Amazon spokesperson said the firm had increased cleaning at all facilities, cancelled non-critical meetings and introduced social distancing measures including removing or spacing out furniture at warehouses and staggering employees' breaks, in addition to encouraging them to wash their hands. The firm has also pledged to give employees who are diagnosed with coronavirus or placed in quarantine up to two weeks of pay....“). However, there is no available evidence that these actions are in response to specific allegations and the actions taken address specific alleged impacts. <p>Amazon provided feedback for this datapoint, by referring to its covid blog and its Duty of Vigilance Plan 2021. In both these sources, a number of measures taken by Amazon to ensure the health and safety of workers in the face of COVID-19 are listed, but there is no reference to the events reported in the allegations, nor is there any evidence available that these actions are in response to the specific allegations and that the actions taken address specific alleged impacts. As a result, the information provided by the company does not change the assessments given for the datapoint considered. [Politico, 20/3/2020, This is crazy:’ Rage boils over at Amazon sites over coronavirus risks: politico.eu] [Amazon's COVID-19 blog, N/A: aboutamazon.com] & [Duty of Vigilance Plan 2021, 06/2022: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken
E(3).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"> • Not Met: Provided remedy: There is no evidence available that Amazon has provided a remedy to affected stakeholders. The company has been ordered to pay a fine in some cases (see above), but there is no evidence that this has been to remediate alleged impacts suffered by workers. • Not Met: Evidence for lack of Impact or link: Amazon disputes the allegations of its inadequate response to the COVID-19 virus. In its responses, the company has provided information on steps the company taken to mitigate the risks. However, the evidence available indicates that Amazon has not provided data or evidence to substantiate the company’s claims that it is not linked to any of the impacts alleged. [Covid-19 Response 'How we’re taking care of employees during COVID-19', 03/02/2021: aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used: A French court investigated the allegations against Amazon in France. This qualifies as an independent process in the context of this datapoint. However, Amazon was held to have violated the law, although this is contested by the company. There is no evidence available that Amazon engaged in an independent process in any of the other allegations in Europe.

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Area: Working hours • Headline: Amazon faces allegations of bad working conditions of delivery drivers • Story: On December 24, 2018, various news outlets reported that an undercover probe has revealed the conditions that Amazon delivery drivers are forced to work under. The workers are subcontracted by delivery companies, many of which work almost exclusively for Amazon. Findings revealed that drivers work regularly more than 12 hour shifts earning less than minimum wage and some overtime was not paid. Furthermore, drivers are also charged to rent vans and get money deducted from wages to pay for criminal history checks, drug and alcohol testing. The pressure of the job has allegedly caused traffic accidents which have resulted in death and injuries of third parties. Following the reports, US senators called for information on the Company's delivery network. [Mirror, 24/12/2018, "Amazon delivery drivers forced to pee in bottles and earning less than minimum wage": mirror.co.uk] [Buzzfeed News, 06/09/2019, "Amazon's Next-Day Delivery Has Brought Chaos And Carnage To America's Streets — But The World's Biggest Retailer Has A System To Escape The Blame": buzzfeednews.com] [Business Insider, 11/09/2018, "Missing wages, grueling shifts, and bottles of urine: The disturbing accounts of Amazon delivery drivers may reveal the true human cost of 'free' shipping": businessinsider.com] [Forbes, 13/09/2018, "Amazon Is Hell On Wheels For Delivery Drivers": forbes.com]
E(4).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: The company responded to the senators' inquiry, stating the following regarding working hours: 'we have sophisticated technology that plans routes to be completed within a specified time period taking into account numerous factors and data from prior routes. Drivers are subject to driving time policies similar to federal Hours of Service requirements, and we take steps to reduce the risk of fatigue. For example, we ensure that drivers who are running late are called back to the delivery station, even if they have packages left to deliver, or a support driver is dispatched to help complete the route. [...] We require that our DSPs provide their employees with competitive wages of at least \$15 an hour, well above the federal minimum wage. We require all DSPs to provide health care coverage that meets or exceeds federal standards for affordability and minimum value, as defined by the Affordable Care Act, for all employees who average at least 30 hours per week. Full time drivers must receive no less than 80 hours of paid time off per year.' <p>The company responded to a BuzzFeed news article that, while it could not answer in detail as many of the cases mentioned in the article were part of ongoing litigation, safety is always its top priority and that even one serious incident is too many. It says that when accidents occur, it works with drivers or their employers to investigate claims and take appropriate actions. They further stated that "the assertions do not provide an accurate representation of Amazon's commitment to safety and all the measures we take to ensure millions of packages are delivered to customers without incident. Whether it's state-of-the art telemetric and advanced safety technology in last-mile vans, driver safety training programs, or continuous improvements within our mapping and routing technology, we have invested tens of millions of dollars in safety mechanisms across our network, and regularly communicate safety best practices to drivers. We are committed to greater investments and management focus to continuously improve our safety performance." Six days after the publication of the article the company added "We require that all delivery service partners maintain comprehensive insurance, including auto liability so if in the rare case an accident does occur, there is coverage for all involved." [Buzzfeed News, 06/09/2019: buzzfeednews.com] [Amazon Response to Senator Blumenthal, 27/09/2019: documentcloud.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The response does not address the accidents linked to the delivery of its packages. It outlines general policies but does not engage with the allegations. [Amazon Response to Senator Blumenthal, 27/09/2019: documentcloud.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(4).2	The Company has appropriate policies in place	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"> • Not Met: Engaged with stakeholders: Amazon provided feedback for this datapoint, by referring to its 2021 Modern Slavery Statement. However, the information provided in this document is not material for the assessment of this indicator. [Modern Slavery Statement 2021, 2022: sustainability.aboutamazon.com] • Not Met: Identified cause: Amazon terminated its relationship to several delivery firms following the allegations. The company claimed that it evaluates its partnerships. However, the company did not disclose if the partnerships with those firms were terminated due to reasons connected to the allegations. It did not disclose if the evaluation of those firms found underlying issues causing the alleged events. <p>Amazon provided feedback for this datapoint, by referring to its 2021 Modern Slavery Statement. However, the information provided in this document is not material for the assessment of this indicator. [Buzzfeed News, 13/10/2019, "Amazon Is Firing Its Delivery Firms Following People's Deaths": buzzfeednews.com] [Modern Slavery Statement 2021, 2022: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company has cut ties with several delivery firms for not being up to standard. However, it is unclear if these were the only firms that were related to the allegation about working hours. <p>Amazon provided a feedback for this datapoint, by referring to its 2021 Modern Slavery Statement. In this document, the Company declares that Amazon is an official corporate sponsor of Truckers Against Trafficking (TAT), an organisation dedicated to fighting human trafficking in the trucking industry, and has begun using TAT training modules to train its internal fleet of drivers, teaching them how to identify and respond to potential victims of human trafficking. The company claims to have trained 100% of the drivers and employees of Amazon's Transport Operations Management by January 2021. However, no evidence is available that such training initiatives were taken as a result of the allegations, or are in any way related to the alleged events.</p> <p>[Buzzfeed News, 13/10/2019: buzzfeednews.com] [Modern Slavery Statement 2021, 2022: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Not Met: Stakeholder input to steps taken [Amazon, 2021, "Modern Slavery Statement": sustainability.aboutamazon.com]
E(4).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"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(5).0	Serious allegation No 5		<ul style="list-style-type: none"> • Area: Child labour; working hours • Headline: Amazon supplier, Foxconn, is facing allegations of breaching Chinese labour laws • Story: On August 8, 2019, the Guardian reported that hundreds of schoolchildren have been drafted by Foxconn to make Amazon's Alexa devices in China as part of an attempt to meet production targets, according to documents seen by the Guardian. <p>According to the documents, the teenagers are classified as "interns", and their teachers are paid by the factory to accompany them. Teachers are asked to encourage uncooperative pupils to accept overtime work on top of regular shifts.</p> <p>Interviews with workers and leaked documents from Amazon's supplier, Foxconn, show that many of the children have been required to work nights and overtime to</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>produce the smart-speaker devices, in breach of Chinese labour laws. Chinese factories are allowed to employ students aged 16 and older, but these schoolchildren are not allowed to work nights or overtime.</p> <p>Foxconn admitted that students had been employed illegally and said it was taking immediate action to fix the situation.</p> <p>Press sources reported that the Foxconn manager who had raised alarms about labour code violations at a Chinese factory that produced Kindles and Amazon Echos was incarcerated.</p> <p>According to CLW, Foxconn's revenge violated the third section 'Grievance Mechanism and Whistle-blower Protections' of the Amazon Supply Chain Standards of Ethical Behaviour.</p> <p>[The Guardian, 08/08/2019, "Schoolchildren in China work overnight to produce Amazon Alexa devices": theguardian.com] [Money Control News, 22/06/2021, Amazon preaches about protecting whistleblowers while Foxconn manager languishes in jail": moneycontrol.com] [China Labor Watch, 22/06/2021, "FORCED LABOR WHISTLEBLOWER WAS SENT TO PRISON BY AMAZON SUPPLY CHAIN FOXCONN": chinalaborwatch.org]</p>
E(5).1	The Company has responded publicly to the allegation	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"> • Met: Public response: According to the press, a spokesperson for the company stated 'We are urgently investigating these allegations and addressing this with Foxconn at the most senior level. Additional teams of specialists arrived on-site yesterday to investigate, and we've initiated weekly audits of this issue.' [The Guardian, 08/08/2019: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: Although Amazon addresses the original allegations of labour rights violations, it does not engage with the details of the allegation. Furthermore, it does not provide a response to the incarceration of Tang Mingfang, the whistleblower, despite his claims of being tortured in prison. [The Guardian, 08/08/2019: theguardian.com] [China Labor Watch, 22/06/2021: chinalaborwatch.org] [China Labor Watch, 30/01/2022, "CHINA LABOR WATCH URGES AMAZON TO ADDRESS WHISTLEBLOWER'S DEMANDS": chinalaborwatch.org]
E(5).2	The Company has appropriate policies in place	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"> • Not Met: Engaged with stakeholders: The company conducted an investigation of the site, however, there is no information available that suggests engagement with affected stakeholders was a part of this investigation. [China Labor Watch, 30/01/2022: chinalaborwatch.org] • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: Foxconn fired the executives who were in charge of the factory. However, there is no information available whether Amazon identified and implemented any improvements to its own management systems. [Money Control News, 22/06/2021, "Amazon preaches about protecting whistleblowers while Foxconn manager languishes in jail": moneycontrol.com] • Not Met: Stakeholder input to steps taken: There is no information available that suggests engagement with affected stakeholders informed the firing of the responsible executives by Foxconn.
E(5).3	The Company has taken appropriate action	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"> • Met: Provided remedy: Foxconn, the linked business, issued a public apology and raised wages. [Money Control News, 22/06/2021: moneycontrol.com] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: Neither Amazon nor Foxconn provided remedies to Tang Mingfang, therefore, the remedies that were provided are not satisfactory to all affected stakeholders [China Labor Watch, 30/01/2022: chinalaborwatch.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Remedy delivered: There is no information available that suggests the remedy was not provided as agreed • Not Met: Independent remedy process used
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> • Area: Forced labour • Headline: Ebay, Walmart and Amazon allegedly sell Turkmenistan cotton products • Story: On the 19th February, 2019, Apparel Insider reported that products made with cotton that was picked using forced labour have been found on Amazon, Walmart and eBay. In May 2018, US Customs and Border Protection (CBP) banned the import of any products containing cotton from Turkmenistan due to the country's systematic use of state-sponsored forced labor during the annual cotton harvest. <p>According to Cotton Campaign (part of International Labour Rights Forum), To harvest cotton, the Turkmen government forces tens of thousands of citizens to pick cotton each year. Authorities force public sector workers, including teachers, doctors, nurses, and staff of government offices to pick cotton, pay a bribe, or hire a replacement worker, under threat of losing their job. Despite national laws prohibiting child labor and a 2008 ban of child labor in the cotton sector, children continue to do the hazardous field work, because the government maintains the cotton production system. Children pick cotton for their parents, who are forced by the government to fulfill individual cotton picking quotas under threat of losing their jobs.</p> <p>Researchers from the International Labour Rights Forum found cotton hand towels advertised as "made in Turkmenistan" on the websites of Amazon, Walmart, and eBay which raised legitimate questions about the Companies' social standards in supply chain. The International Labor Rights Forum said none of retailers are directly importing or selling the products, but instead they were allowing third-party sellers access to their e-commerce platforms in exchange for a cut of the sales proceeds.</p> <p>[Apparel Insider, 19/02/2019, "Turkmenistan cotton products found on Walmart, ebay and Amazon websites": apparelinsider.com] [Thompson Reuters Foundation News, 31/01/2019, "Are Amazon, Walmart, and eBay's online 'marketplaces' providing a refuge for goods made with forced labor?": news.trust.org]</p>
E(6).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: In a statement on the Business and Human Rights Resource Centre, the company states that 'Third-party sellers are required to comply with all relevant laws, regulations, and policies when listing items for sale in our store. Those who do not will be subject to action, including potential removal of their account. Items produced in whole or in part by forced labor, such as cotton from Turkmenistan and Uzbekistan, are prohibited by Amazon. The items in question are no longer available'. [The Business and Human Rights Resource Centre, 18/02/2019, "Amazon response to allegation on cotton from Turkmenistan": business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: The statement addresses the issue of forced labour in Turkmenistan and outlines the actions taken by Amazon after the allegation.
E(6).2	The Company has appropriate policies in place	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"> • Not Met: Engaged with stakeholders: The company provided feedback but the information provided is not material for the assessment of this indicator. [Modern Slavery Statement 2021, 2022: sustainability.aboutamazon.com] & [Sustainability Website, N/A: sustainability.aboutamazon.com] • Not Met: Identified cause: The company does not provide information as to how the products found their way into the store or the issues causing forced labour in Turkmenistan. <p>The company provided a feedback but the information provided does not change the assessments for this datapoint. In the sources provided by the company, a</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>number of measures taken by Amazon to address human rights risks in global cotton supply chains are mentioned (i.e. joining better cotton and the Responsible Sourcing Network (RSN) initiative YESS: Yarn Ethically & Sustainably Sourced), but there is no reference to the events reported in the allegations. [Modern Slavery Statement 2021, 2022: sustainability.aboutamazon.com] & [Sustainability Website, N/A: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: The company removed the items in question from its store. [The Business and Human Rights Resource Centre, 18/02/2019: business-humanrights.org] • Not Met: Stakeholder input to steps taken: The company provided a feedback but the information provided does not change the assessments given for this datapoint. In the sources provided by the company, a number of measures taken by Amazon to address human rights risks in global cotton supply chains are mentioned (i.e. joining better cotton and the Responsible Sourcing Network (RSN) initiative YESS: Yarn Ethically & Sustainably Sourced), but there is no reference to the events reported in the allegations, nor is there any evidence available that these actions are in response to the specific allegations and that that they were implemented on the basis of input from the affected stakeholders. [Sustainability Website, N/A: sustainability.aboutamazon.com] & [Modern Slavery Statement 2021, 2022: sustainability.aboutamazon.com]
E(6).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"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(7).0	Serious allegation No 7		<ul style="list-style-type: none"> • Area: Discrimination • Headline: Amazon accused of dismissing a worker due to her pregnancy in the US and denying a pregnant employee to be excused from strenuous task in the UK • Story: Seven women working at Amazon fulfilment warehouses over the past eight years have alleged that they were discriminated against for being pregnant. Following the notification of their superiors of pregnancy, seven women were fired. Six of the seven women settled with Amazon out of court. The women requested "longer bathroom breaks and fewer hours on their feet," and stated that Amazon "failed to accommodate their needs." The company denies the allegation, saying that it has not fired anyone for being pregnant. [BBC News, 08/05/2019, "Amazon accused of failing pregnant workers": bbc.co.uk] [CNET, 08/05/2019, "Amazon fired these 7 pregnant workers. Then came the lawsuits": cnet.com]
E(7).1	The Company has responded publicly to the allegation	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"> • Met: Public response: The company denies that it would fire any employee for being pregnant, stating that it is an equal opportunity employer. Amazon stated that it cannot comment on "anecdotal cases" but that once an employee informs the company they are pregnant Amazon works closely with them and carries out a full risk assessment and, if necessary, consults a doctor. <p>"If the employee's health or that of the unborn child is at risk due to the work they are employed to do at Amazon, we will vary the employee's conditions to alleviate any risk, or find the employee a suitable, alternative role. We will, as a last option, place the employee on full paid sick leave."</p> <p>The company added that "We work with our employees to accommodate their medical needs, including pregnancy-related needs. We also support new parents by offering various maternity and parental leave benefits." A spokeswoman told CNet "Amazon accommodates work restrictions for pregnant employees within our fulfilment centers; typically, these accommodations vary including based on the employee's particular needs." [BBC News, 08/05/2019: bbc.co.uk] [CNET,</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>08/05/2019: cnet.com] [Global Human Rights Principles (website), N/A: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The responses remain general and do not address individual cases or the specific circumstances of the allegations. The company stated that it was not able to discuss the specifics of ongoing cases or anecdotal cases.
E(7).2	The Company has appropriate policies in place	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"> • Not Met: Engaged with stakeholders • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(7).3	The Company has taken appropriate action	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"> • Met: Provided remedy: The company reached out of court settlements with some of the affected stakeholders. [BBC News, 08/05/2019: bbc.co.uk] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: Even though the company provided settlements to some of the affected stakeholders, there is still at least one affected stakeholder who is pursuing the case. Therefore, satisfactory remedy has not been provided to all affected stakeholders. [BBC News, 08/05/2019: bbc.co.uk] • Met: Remedy delivered: There is no evidence that the company did not provide the settlements as agreed. • Not Met: Independent remedy process used
E(8).0	Serious allegation No 8		<ul style="list-style-type: none"> • Area: Forced labour • Headline: Amazon among companies accused of using suppliers linked to forced labour in China • Story: On March 1st., 2020, the Australian Strategic Policy Institute (ASPI) released a report that named Amazon among 83 other companies benefiting from the use of potentially abuse labour transfer programs. According to the report, more than 80,000 Uighur residents and former detainees from the north-western region of Xinjiang, China have been transferred to factories, implicating global supply chains. It is alleged that Muslim minorities are thought to be working in forced labour conditions across the country. The ASPI report said that workers live in segregated dormitories, are required to study Mandarin and undergo ideological training. The workers were transferred out of Xinjiang between 2017 and 2019, claiming that people are being effectively "bought" and "sold" by local governments and commercial brokers. ASPI used open-source public documents, satellite imagery, and media reports and identified 27 factories in nine Chinese provinces that have used labourers. According to the ASPI's research, the companies named in the report are directly or indirectly benefiting from the use of Uyghur workers outside Xinjiang through potentially abusive labour transfer programs as recently as 2019. ASPI researchers stated: "This report exposes a new phase in China's social re-engineering campaign targeting minority citizens, revealing new evidence that some factories across China are using forced Uighur labour under a state-sponsored labour transfer scheme that is tainting the global supply chain". <p>On July 20, 2020, O-Film subsidiary Nanchang, an Amazon supplier, was one of the eleven companies blacklisted by the U.S. Department of Commerce's Bureau of Industry and Security over alleged human rights abuses involving Uighur Muslims in China. According to the U.S. Department of Commerce, the O-Film subsidiary was named on the list "in connection with the forced labour of Uighurs and other Muslim minority groups in western China". Companies on the list must apply for special licenses to access U.S. technologies.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>On December 29, 2020, press sources reported that an investigation by The Washington Post and the Tech Transparency Project, revealed that Companies including Amazon, Tesla and Apple are sourcing parts from a Chinese supplier that allegedly uses forced Muslim labour. The Tech Transparency Project found documents detailing how Lens Technology, Amazon’s supplier, uses “thousands of Uyghur workers from the predominantly Muslim region of Xinjiang” in its factories. In beginning 2020, Congress introduced a bill that would keep goods made with forced labour in the Uyghur region of China from entering the US and that Companies would be held responsible for such human rights violations.</p> <p>[The Guardian, 01/03/2020, "China transferred detained Uighurs to factories used by global brands – report": theguardian.com] [ZDNet, 22/07/2020, "US adds 11 more Chinese companies to entity list for Uyghur human rights violations": zdnet.com] [Engadget, 29/12/2020, "Apple, Amazon and Tesla supplier accused of using forced labor": engadget.com] [Business and Human Rights Resource Centre, 01/03/2020, "China: 83 major brands implicated in report on forced labour of ethnic minorities from Xinjiang assigned to factories across provinces; Includes company responses": business-humanrights.org</p>
E(8).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: There are several responses by Amazon captured by various media sources. The company stated that forced labour practices are not tolerated and that it expects all items sold in its stores to comply with its supply chain standards, adding that the company takes action if it receives proof of forced labor. In particular, in its response to the Australian Strategic Policy Institute's report, the company stated: "Given this complex situation, we took immediate steps to investigate the findings in the March 2020 Australian Strategic Policy Institute (ASPI) report and actively collaborate with industry partners, subject matter experts, governments and other relevant stakeholders to further enhance our due diligence efforts in line with ASPI recommendations. Our investigation concluded that we did not directly source from three of the four entities linked to Amazon in the original version of the ASPI report. We clarified this to the Institute and it has amended its report. In addition, we have stopped sourcing from the fourth entity following the addition of that company to the U.S. Department of Commerce's Entity List in July 2020. Amazon recognizes that the United States government, through several trade-related actions, has recently identified a number of entities as possibly being engaged in the use of forced labor related to ethnic minorities from Xinjiang. Amazon is actively investigating its supply chain and has not identified direct sourcing links with any of those entities." <p>[Business and Human Rights Resource Centre, 02/10/2020, "Amazon's updated response to the Australian Strategic Policy Institute's report on forced labour of ethnic minorities from Xinjiang": business-humanrights.org] [The information, 10/05/2021, "Seven Apple Suppliers Accused of Using Forced Labor From Xinjiang": theinformation.com] [Insider, 08/03/2022, "Amazon accused of using Chinese suppliers with links to forced Uyghur labor": businessinsider.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: Amazon spokeswoman Samantha Kruse declined to comment on the findings of the Washington Post and Tech Transparency Project investigation into Lens Technology’s use of forced Uyghur labour. In addition, Amazon did non respond to the request for observations submitted by the Working Group on Business and Human Rights on the allegation of forced Uyghur labour in Amazon's supply chain. <p>Thereby, the company did not address all aspects of the allegations in detail. [The Washington Post, 29/12/2020, "Apple’s longtime supplier accused of using forced labor in China": archive.ph] [Joint communication by UN Special Rapporteurs dated 12/03/21, (OTH 55/2021): spcommreports.ohchr.org]</p>
E(8).2	The Company has appropriate policies in place	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders • Not Met: Identified cause: With regard to the revelations of the ASPI's report, Amazon declared: "Our investigation concluded that we did not directly source from three of the four entities linked to Amazon in the original version of the ASPI report". The company therefore implicitly admitted to sourcing from one of the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>companies using forced labour listed in the report. However, the company did not address in any way the causes of forced Uyghur labour in its supply chain. [Business and Human Rights Resource Centre, 02/10/2020: business-humanrights.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: The company declared to have stopped sourcing from the fourth entity mentioned in the ASPI Report following the addition of that company to the U.S. Department of Commerce's Entity List in July 2020. Moreover, since 2021, Amazon has removed two Esquel (a major textiles manufacturer with extensive operations in Xinjiang) subsidiaries from its supplier list. [Tech Transparency Project, 07/03/2022 "Amazon Suppliers Tied to Forced Labor in Xinjiang": techtransparencyproject.org] • Not Met: Stakeholder input to steps taken: There is no evidence suggesting that the views of affected stakeholders were taken into account in the improvement of the company policies.
E(8).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"> • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(9).0	Serious allegation No 9		<ul style="list-style-type: none"> • Area: Health & safety • Headline: Amazon workers raise concerns about lack of workplace safety protocols after warehouse collapse during tornado • Story: On 10 December 2021, six Amazon employees were killed in a warehouse collapse in Edwardsville, Illinois after the building was struck by a tornado. The Occupational Safety and health Administration (Osha) opened a workplace safety investigation into the incident following concerns by workers and their representatives regarding insufficient emergency training and company policies that bans workers from keeping their cell phones at their workplaces. <p>The restrictive phone policy has come under scrutiny after the incident, as it prevents workers from receiving weather alerts.</p> <p>More questions are being raised over whether adequate shelter was available, whether workers were advised to go there immediately, and whether the shifts should have gone ahead that evening at all, given the warnings of severe weather. [Business and Human Rights Resource Centre, 14/12/2021, "USA: Amazon workers raise concerns about lack of workplace safety protocols after warehouse collapse during tornado; incl. co. Comment": business-humanrights.org] [The Independent, 13/12/2021, "'No way in hell I am relying on Amazon': Company phone ban worries employees after six die in warehouse cave-in": independent.co.uk] [BBC News, 13/12/2021, "Amazon criticised over safety at tornado-hit warehouse": bbc.com] [The Guardian, 14/12/2021, "Amazon faces scrutiny over worker safety after tornado strikes warehouse": theguardian.com]</p>
E(9).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response: A spokesperson of Amazon was cited by the BHRRC commenting on the incident. [Business and Human Rights Resource Centre, 14/12/2021: business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Detailed response: There are several detailed responses by Amazon captured by various media sources. The company has offered its condolences to the families of the victims and thanked first responders for their efforts. Amazon reportedly stated that workers did not have enough time to prepare when the tornado warning was declared. The company's senior vice president stated that "There was a tremendous effort that happened that night to keep everybody safe". Additionally, an Amazon spokesperson stated that "[e]mergency response training is provided to new employees and that training is reinforced throughout

Indicator Code	Indicator name	Score (out of 2)	Explanation
			the year". The spokesperson also shared that employees were allowed to have their cell phones at the time of the tornado. [Business and Human Rights Resource Centre, 14/12/2021: business-humanrights.org] [The Independent, 13/12/2021: independent.co.uk] [BBC News, 13/12/2021: bbc.com] [The Guardian, 14/12/2021: theguardian.com]
E(9).2	The Company has appropriate policies in place	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"> • Not Met: Engaged with stakeholders: A spokesperson of Amazon was cited by media stating that the company will continue to support its employees and partners. However, there is no evidence that the company engaged with the workers to investigate the causes leading to the death of the six employees. Additionally, media reported that Amazon encrypted internal help ticket messages about the Edwardsville facility, making them inaccessible to most employees. [The Independent, 13/12/2021: independent.co.uk] • Not Met: Identified cause: According to Amazon events unfolded "incredibly fast". After the tornado warning was released, the company stated that it "notified and directed to move to a designated and marked shelter in place location". Majority of workers had reportedly taken shelter in the designated areas while a small group of employees had taken shelter in the area of the facility which was affected by the tornado. Furthermore, Amazon's senior vice president was cited by media, stating that "all procedures were followed correctly." Thereby the company fails to identify the reasons that led to the death of its employees. [Business and Human Rights Resource Centre, 14/12/2021: business-humanrights.org] [BBC News, 13/12/2021: bbc.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: According to Amazon they did everything correctly and notified employees of the tornado warning. Allegations of workers, however, point to a culture of prioritizing productivity over safety. Workers allege that they never underwent tornado drills while media reported that the company "failed to notify employees of the tornado even as it happened." There is no indication that Amazon is improving its management systems following the events. [Business and Human Rights Resource Centre, 14/12/2021: business-humanrights.org] [The Intercept, 13/12/2021, "After deadly warehouse collapse, amazon workers say they receive virtually no emergency training": theintercept.com] • Not Met: Stakeholder input to steps taken: There is no indication that the company included input from affected stakeholders in its decision making following the event. Media reported that Amazon encrypted internal help ticket messages about the Edwardsville facility, making them inaccessible to most employees, thereby actively excluding them from the investigation and following actions. [The Intercept, 13/12/2021: theintercept.com]
E(9).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"> • Not Met: Provided remedy: Although Amazon plans to donate \$1 million to the community foundation and it is providing relief in the form of transportation, food and water, the company has yet to take any steps that would remedy the underlying cause of the incident. [BBC News, 13/12/2021: bbc.com] • Not Met: Evidence for lack of Impact or link [The Intercept, 13/12/2021: theintercept.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: No reports have been made by workers being satisfied or third parties regarding remediation efforts of Amazon. It is also unclear whether the company has disbursed the donation it promised. • Not Met: Remedy delivered: There are no clear reports on whether the company has delivered the remediation it has promised (i.e. relief aid and donation) • Not Met: Independent remedy process used

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 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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