

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Amazon
Sector Food and agricultural products, Apparel & ICT manufacturing (supply chain only)
Overall score 21.6 out of 100

Theme score	Out of	For theme
2.6	10	A. Governance and Policy Commitments
7.8	25	B. Embedding Respect and Human Rights Due Diligence
2.5	20	C. Remedies and Grievance Mechanisms
5.1	25	D. Performance: Company Human Rights Practices
3.6	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 Policy Commitments (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	2	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_web, N/A: sustainability.aboutamazon.com] Score 2 <ul style="list-style-type: none"> Met: Commitment to UNGPs: The Supply Chain Standards indicates: 'Amazon is committed to respecting and supporting the UN Guiding Principles on Business and Human Rights'. Although it is a supplier document, the commitment makes reference to the Company itself. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commitment to ILO core principles: 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_web, N/A: sustainability.aboutamazon.com] <ul style="list-style-type: none"> Not Met: Explicitly lists all four ILO core principles: 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 [...]'. [Global Human Rights Principles_web, N/A: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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 webpage section Human Rights adds: 'Amazon's policies and practices are designed to promote respect for the rights of freedom of association and collective bargaining and to comply with the legal requirements of the countries where we operate'. However, general website content is not considered a suitable source for policy statements under CHRB's revised approach. [Global Human Rights Principles_web, N/A: sustainability.aboutamazon.com] & [Human Rights_web, N/A: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to ILO core principles: The Supply Chain Standards indicates: 'we are committed to providing products and services that are produced or supplied in a way that respects human rights and the environment and protects the fundamental dignity of workers. We engage with Suppliers that are committed to these same principles. [...]'. 'Amazon is committed to respecting and supporting the [...] Core Conventions of the ILO, and the ILO Declaration on Fundamental Principles and Rights at Work. These Standards are derived from the above internationally recognized principles, standards, and frameworks. When interpreting these Standards, we follow UN and ILO guidance materials and definitions'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Explicitly lists all four ILO core principles for suppliers: The Supply Chain Standards has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining. As for freedom of association and collective bargaining, it adds: 'Suppliers must respect the rights of workers to form, join, or refrain from joining, a labor union or other lawful organization of their own selection. Suppliers must respect workers' rights to freedom of association and collective bargaining. Workers must not be penalized or subjected to reprisal, harassment, or intimidation for the non-violent exercise of these rights'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'lawful organization'. In these cases (companies referring to local laws in freedom of association and collective bargaining), Companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]
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's code indicates that it 'provides a clean, safe and healthy work environment'. [Code of Business and Ethics - Website, N/A: ir.aboutamazon.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects suppliers to commit to H&S of workers: The Supply Chain Standards indicates: 'Suppliers are required to provide workers with a safe and healthy work environment that avoids harm to workers' physical and mental health'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Expects suppliers to commit to ILO working hours standards or 48 hour regular work week: The Supply Chain Standards indicates: 'Suppliers should regularly monitor working hours to maintain 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. Suppliers are required to provide workers with legally required breaks, or reasonable breaks where the law is silent. [...] Suppliers are encouraged to pay wages that meet or exceed industry average, pay overtime at a rate exceeding the regular hourly compensation rate'. However, no formal commitment about respecting the ILO conventions on working hours was found. Alternatively, the Company would achieve this by committing to a 48 hours regular working week. Moreover, it is not clear overtime is consensual. Finally, it is not clear suppliers are expected to pay overtime at a premium rate, as the Company indicates 'Suppliers are encouraged' to do so. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.3.a.AG	Commitment to respect human rights particularly relevant to the sector – 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: Commitment to respect land ownership/natural resources as in VGGT: No further details found during last revision. • Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards: No further details found during last revision. • Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: No further details found during last revision. • Not Met: Expects suppliers to make these commitments: The Supply Chain Standards indicates: 'Suppliers must respect the legal land rights of individuals, indigenous people, and local communities, inclusive of their established public, private, communal, collective, indigenous, and customary rights over natural resources (e.g., fisheries, forests, and water). However, no evidence found of a requirement to respect land/natural resources rights as set out in VGGT or the IFC performance standards, and indigenous rights following international standards. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect the right to water: No further details found during last revision. • Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing: No further details found during last revision. • Not Met: Expects suppliers to make these commitments: The Supply Chain Standards indicates: 'Suppliers may not engage in land grabbing or illegal use of land or natural resources in our supply chain. Supplier utilization of land and natural resources, including acquisition, development, or lease are subject to Free, Prior, and Informed Consent (FPIC) of the affected local communities, such as women, indigenous peoples, and other marginalized stakeholders. Upon Amazon’s request, Suppliers are required to demonstrate a legal right to use land and/or natural resources’. No evidence found, however, of a requirement for suppliers to commit to respect the human right to water. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]
A.1.3.b.AG	Commitment to respect human rights particularly relevant to the sector – 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: Commitment to 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 Supply Chain Standards indicates: 'Suppliers should pay particular attention to the risks of exploitation that both domestic and foreign migrant workers face. Suppliers must respect migrant workers’ rights and not discriminate against migrant workers’. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commitment refers to 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: Expects suppliers to respect these rights: No further details found during last revision.
A.1.3.AP	Commitment to respect human rights particularly relevant to the sector – 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: Commitment to 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 Supply Chain Standards indicates: 'Suppliers should pay particular attention to the risks of exploitation that both domestic and foreign migrant workers face. Suppliers must respect migrant workers’ rights and not discriminate against migrant workers'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commitment refers to 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: Expects suppliers to respect these rights: No further details found during last revision.
A.1.3.a.ICT	Commitment to respect 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: Commitment to responsible mineral sourcing: The Company states in its 2021 2021 Form SD that: 'We are committed to avoiding the use of minerals that

Indicator Code	Indicator name	Score (out of 2)	Explanation
	particularly relevant to the sector – responsible sourcing of minerals (ICT)		<p>have fuelled conflict, and we expect our suppliers to support our efforts to identify the origin of gold, tin, tungsten, and tantalum used in products that we manufacture or contract to manufacture’. However, no formal statement of commitment to responsible sourcing found (not benefiting armed groups, respecting human rights). [2021 Conflict Minerals Report - Form SD, 2022: d18rn0p25nwr6d.cloudfront.net]</p> <ul style="list-style-type: none"> • Met: Commitment to following OECD Guidance on 3GT: The Company states in its 2021 Form SD 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. [2021 Conflict Minerals Report - Form SD, 2022: d18rn0p25nwr6d.cloudfront.net] • Not Met: Requires suppliers to commit to responsible mineral sourcing: The 2021 Form SD indicates that: ‘Amazon is committed to avoiding the use of minerals that have fuelled conflict. Suppliers should support our effort to identify the origin of designated minerals used in our products consistent with recognized due diligence frameworks. In line with this due diligence, Suppliers should source from smelters and refiners that have successfully completed a recognized third-party responsible minerals audit’. However, it is not clear the Company requires its suppliers to follow the Company’s responsible sourcing policy or the company requires its suppliers to follow the OECD Guidance. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to OECD Guidance covers all minerals: As indicated above, the 2021 Form SD states 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’. However, no explicit commitment found to responsible sourcing of all minerals in a suitable source for policy statements. [2021 Conflict Minerals Report - Form SD, 2022: d18rn0p25nwr6d.cloudfront.net] • Not Met: Expects suppliers to make similar requirements of their suppliers: No further details found during last revision.
A.1.3.b.ICT	Commitment to respect human rights particularly relevant to the sector – 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: Commitment to 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 Supply Chain Standards indicates: 'Suppliers should pay particular attention to the risks of exploitation that both domestic and foreign migrant workers face. Suppliers must respect migrant workers’ rights and not discriminate against migrant workers'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commitment refers to 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: Expects suppliers to respect these rights: No further details found during last revision.
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: Commitment to remedy adverse HRs impacts: The Company states in its Global Human Rights Principles: ‘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 any adverse impact that it may cause, including 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'. The 2022 Modern Slavery Statement notes: ‘Risk assessments also help us detect an issue before we engage with suppliers or during our relationship with

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			<p>them so that we can work with suppliers to remedy the issue. If audit findings require remediation, including those related to modern slavery, suppliers develop a corrective action plan detailing actions to address those findings. [...] our central team has worked with operations teams to assess and address human rights risks, identify, scope and execute programs with Amazon businesses across different regions, and engage on remediation plans where non-compliances were identified. Where these assessments pointed towards a systemic issue, we worked with cross-functional teams to understand root causes and remediate issues'. 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. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] & [Global Human Rights Principles_web, N/A: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Not Met: Expects suppliers to make this commitment: The Supply Chain Standards indicates: 'Suppliers should maintain a process for timely remediation of nonconformance identified by internal or external assessments, inspections, investigations, reviews, and reports'. However, it is not clear the Company expects suppliers to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: No further details found during last revision. • Not Met: Commitment to work with suppliers on remedy: 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 statement (or sustainability report) is not considered a suitable source for policy statements under CHRB's revised approach. No further details found during last revision. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] & [Sustainability report 2020, 2021: sustainability.aboutamazon.com]
A.1.5	Commitment to respect the rights of human rights defenders	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: Zero tolerance of threats/attacks on HRDs: The 2021 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'. The 2022 Modern Slavery Statement notes: 'We maintain an escalation process to evaluate credible allegations and reports of selling partner violation of our Supply Chain Standards including, but not limited to, those published by governments, human rights defenders, reputable investigators, and journalists. 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] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: Expects suppliers to make this commitment: The Supply Chain Standards indicates: 'Suppliers must protect worker whistle-blower confidentiality and prohibit retaliation against worker whistle-blowers, who in good faith report improper conduct (for example, related to environmental or human rights violations, workplace grievances, and unethical business practices) by a Supplier or an employee or officer of a Supplier'. 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). [Global Human Rights Principles_web, N/A: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: 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 2021 Modern Slavery Statement: 'We are committed to embedding human rights considerations into decision-making across our company and into our policy and governance framework. [...] the Nominating and Corporate Governance Committee oversees Amazon's environmental, social, and corporate governance policies and initiatives. This includes policies and initiatives related to corporate social responsibility, including human rights and ethical business practices, and related risks most relevant to Amazon's operations and engagement with customers, suppliers, and communities'. [Nominating and Corporate Governance Committee Charter, N/A: ir.aboutamazon.com] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: Describes HRs expertise of Board member <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications
A.2.2	Board responsibility	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: Process to review HRs strategy at board level: The 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, other than with respect to human capital management matters, which are overseen by the Leadership Development and Compensation Committee, and compliance and controls matters, which are overseen by the Audit Committee'. However, no further details of its processes to discuss and regularly review its human rights strategy or policy or management processes at Board level or a Board committee found. [2022 Proxy Statement, 2022: s2.q4cdn.com] • Not Met: Example of HRs issues/trends discussed in last reporting period: The 2021 Sustainability report states that 'In 2021, as part of our corporate governance 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'. The 2022 Proxy Statement indicates: 'During the past year, the Nominating and Corporate Governance Committee met with management and reviewed matters that included: [...] consideration of the Company's policies and initiatives regarding the environment and sustainability, corporate social responsibility, and corporate governance'. However, no specific details found in relation to specific human rights issues or trends discussed. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] & [2022 Proxy Statement, 2022: s2.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: At least one board member incentive linked to HRs commitments • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other board incentives for coherence with HRs policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Board process to review business model and strategy for HRs risks [2021 Sustainability report, 2022: sustainability.aboutamazon.com] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: Describes frequency and triggers for reviewing business model <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews

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	<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 • Not Met: Senior responsibility for HRs implementation and decision making <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The webpage section Human Rights indicates: 'As a global company, we recognize the responsibility and opportunity we have to raise awareness among our employees on human rights issues. We have a central team that works across the company to operationalize human rights due diligence and embed human rights considerations into everyday business decisions'. [Human Rights_web, N/A: sustainability.aboutamazon.com] • Not Met: Day-to-day resources and expertise allocation in own operations • Not Met: Resources and expertise allocation in supply chain
B.1.2	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Senior manager incentives linked to HRs commitments: 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 incentives, or other evidence which linked human rights to the Company's incentive mechanisms for senior managers. No further details found during last revision. [Proxy Statement 2020, 27/05/2020: s2.q4cdn.com] • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Performance criteria linked to HRs made public • Not Met: Review of other senior management incentives for coherence with HRs policies
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: HRs risks 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] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assessment by Audit Committee or independent third party
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 • Not Met: Communicates HRs policies 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>slavery using localized scenarios'. The webpage section Human Rights indicates: 'We also offer trainings tailored to salient human rights risks. For example, our forced labor awareness program makes ongoing training available to employees around the world to help them recognize indicators of forced labor and report concerns to appropriate authorities in a way that puts the interests of potential victims first'. 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 or on specific topics. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] & [Sustainability report 2020, 2021: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: Example of how HRs policies are accessible for intended 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 • Not Met: Describes steps to communicate HRs policies to supply chain • Met: Requires suppliers to communicate HRs policies: The Supply Chain Standard Manual indicates: 'Our Supplier Code includes expectations for how you manage your facilities and supply chain. Adopting a management system that focuses on continuous improvement and worker communication will help you develop sustainable workplaces. We also expect you to cascade our standards to your own suppliers and subcontractors'. The Supply Chain Standards adds: 'Suppliers are required to continuously monitor and enforce these Standards in their own operations and supply chain, including with subcontractors'. The supply standards are included in agreements as indicated below. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] & [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The 2021 Modern Slavery Statement indicates: 'Selling Partners contracting with Amazon for services, (including Selling on Amazon, Fulfilment by Amazon, Amazon Advertising, 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'. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Met: Requires suppliers to cascade contractual/binding HRs policies to its suppliers: The Supply Chain Standard Manual indicates: 'We also expect you to cascade our standards to your own suppliers and subcontractors'. The Supply Chain Standards adds: 'Suppliers are required to continuously monitor and enforce these Standards in their own operations and supply chain, including with subcontractors'. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] & [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]
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: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments: The Global Human Rights Principles indicates: 'We expect and encourage everyone in our business to embed these principles into their everyday work and provide employee training to raise awareness on them. [...] We provide training to employees on topics covered within the Code of Business Conduct and Ethics, including how to submit anonymous complaints to Amazon's third-party Ethics Hotline'. The Code of Business Conduct, however, only cover discrimination (as material issues). The 2021 Modern Slavery Statement adds: 'We provide a modern slavery training program for our own employees. [...] Our forced labor awareness program makes ongoing training available to employees around the world to recognize indicators of forced labor and report concerns to appropriate authorities in a way that puts the interests of potential victims first. The training provides scenarios and examples of signs of human trafficking and provides guidance on how to act in a manner that prioritizes the safety of potential victims'. However, although it indicates that it has Human Rights trainings for workers, no further description of the training found. It has expanded on its human trafficking, however, it is not clear how workers are trained on the Company's Human Rights policy beyond human trafficking and discrimination. [Global Human Rights Principles_web, N/A: sustainability.aboutamazon.com] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Trains relevant managers including procurement on HRs: The Sustainability Report 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 procurement workers receive human rights training relevant to their role. Previous evidence was based in a document that is considered to be older than three reporting years. [Sustainability Report 2019, 06/2020: sustainability.aboutamazon.com] Score 2 • Not Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Met: Trains suppliers to meet HRs commitments: The 2021 Modern Slavery Statement indicates: 'In 2021, we continued to offer suppliers on-site and remote training to help them understand Amazon requirements, effectively navigate the corrective action plan process, and design and implement sustainable management systems to encourage supplier monitoring throughout their supply chain. We partner with suppliers on particular areas of concern and encourage suppliers to participate in external training programs, such as industry association tutorials to recognize and prevent modern slavery and implement high quality management systems. We are continuously exploring ways to use Amazon's expertise to expand this support'. It discloses more examples of supplier capacity building, including regarding responsible recruitment practices. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: Discloses % suppliers 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: Score of at least 1 on A.1.2.a • Not Met: Monitors implementation of HRs 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 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. However, evidence refers to supplier audits. No evidence found of how the Company monitors compliance with its human rights commitments in its own operations. No further details on how compliance is monitored in its own operation found during last revision. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] & [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] • Not Met: Discloses % of supply chain monitored: In its webpage Supplier Assessment, it indicates: 'In 2021, we conducted 5,952 assessments to help us determine which suppliers to work with and, for those we do engage, to help us understand and continually improve those suppliers' practices'. However, it is not clear the proportion it represents. [Supplier Assessments_web, N/A: sustainability.aboutamazon.com] • Not Met: Describes 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 actions 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 2021

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Modern Slavery Statement 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] & [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Met: Discloses findings and number of correction action processes: The 2021 Modern Slavery Statement discloses information about the results of Audits where issues was found in 2019, 2020 and 2021 including Worker-paid recruitment fees, Control of documents and Mandatory overtime. In its webpage Supplier Assessment, it indicates: 'In 2021, we conducted 5,952 assessments to help us determine which suppliers to work with and, for those we do engage, to help us understand and continually improve those suppliers' practices'. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] & [Supplier Assessments_web, 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: HRs performance affects selection suppliers: The Supply Chain Standard Manual indicates: 'All facilities must submit an Amazon-approved audit before beginning production for Amazon'. In addition, in 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. [...] Pre-Production Assessments: Suppliers must submit an Amazon-approved assessment of their facilities before beginning production of Amazon-branded products (28% of assessments conducted in 2021 were Pre-Production Assessments)'. The 2022 Modern Slavery Statement notes: 'We strengthened our Supply Chain Standards to align with current best practice and regulatory standards. In 2022 we updated our Supply Chain Standards and, as part of those updates, we included additional requirements to protect workers from harmful recruitment practices, further clarification that suppliers are required to create and maintain an equitable and effective grievance mechanism for workers, and mandatory remediation if cases of child labor are identified, including through corrective measures that facilitate the child's safety and wellbeing'. It contains further information on how it support suppliers to meet these standards, its due diligence process and on its 2022 progress on addressing modern slavery in general. However, it is not clear how human rights performance is taken into account in the identification or selection of business partners in the agriculture sector (current evidence refers to facilities, assuming manufacturing activities and standards to be met after there is a business relationship). [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] & [Supplier Assessments_web, N/A: sustainability.aboutamazon.com] • Met: HRs performance affects continuation 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: Describes positive HRs incentives for business relationships • Met: Works with suppliers to meet HRs requirements: The 2021 Modern Slavery Statement indicates: 'In 2021, we continued to offer suppliers on-site and remote training to help them understand Amazon requirements, effectively navigate the corrective action plan process, and design and implement sustainable management systems to encourage supplier monitoring throughout their supply chain. We partner with suppliers on particular areas of concern and encourage suppliers to participate in external training programs, such as industry association tutorials to recognize and prevent modern slavery and implement high quality management systems. We are continuously exploring ways to use Amazon's expertise to expand this support'. It discloses more examples of supplier capacity building, including regarding responsible recruitment practices. [2021 Modern Slavery statement, 2022: 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: Describes how workers and communities identified and engaged in the last two years: The Company states in its Human Rights website section: 'We're committed to driving best practices in human rights due diligence through

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>increased disclosures about our approach and by expanding our stakeholder engagement'. The 2021 Sustainability Report indicates it engages with stakeholders during it HRIAs: 'For each HRIA, we partner with an independent human rights consulting firm to [...] facilitate stakeholder engagement [...]. Engagement with external stakeholders is key to our human rights due diligence approach. [...] Through regular stakeholder engagement and strategic partnerships, we incorporate invaluable expert input into our work, helping us achieve greater impact on people connected to our business around the world'. However, no information found about a stakeholder system in place to identify with affected or potentially affected stakeholder, including workers or local communities in its supply chain, in the last two years. [Human Rights_web, N/A: sustainability.aboutamazon.com] & [2021 Sustainability report, 2022: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses stakeholders whose 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 sub indicator 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 sub indicator looks for specific examples of dialogue held with affected stakeholders in relation to human rights. No further details found during last revision. [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 HRs issues • Not Met: Describes how stakeholders views influenced company's HRs 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	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: Describes process of identifying risks in own operations: The webpage section Human Rights indicates: 'We're committed to assessing, prioritizing, and addressing adverse human rights impacts connected to our business, and are continually working to improve our approach. At Amazon, businesses deploy a variety of mechanisms to do this. [...] Within our own operations, our central team focuses on human rights due diligence and collaborates with teams dedicated to assessing, prioritizing, and addressing human rights risks to our employees'. The 2021 Sustainability Report adds: 'In 2020, Amazon worked with sustainability and human rights consulting firm Article One Advisors to conduct our first enterprise wide saliency assessment, focused on identifying salient human rights risks across our business. We consulted a diverse group of external human rights experts, incorporated their feedback into the results, and benchmarked the results against internationally recognized human rights standards. The assessment identified a set of priority human rights values, three foundational commitments, and key salient human rights risks for Amazon'. [Human Rights_web, N/A: sustainability.aboutamazon.com] & [2021 Sustainability report, 2022: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes process for identifying risks in 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] Score 2 • Not Met: Describes global risk identification system incl. stakeholder consultation: The 2021 Sustainability Report adds: 'In 2020, Amazon worked with sustainability and human rights consulting firm Article One Advisors to conduct our first enterprise wide saliency assessment, focused on identifying salient human rights risks across our business. We consulted a diverse group of external human rights experts, incorporated their feedback into the results, and benchmarked the results against internationally recognized human rights standards. The assessment identified a set of priority human rights values, three foundational commitments, and key salient human rights risks for Amazon'. The webpage section Human Rights adds: 'Within our own operations, our central team focuses on human rights due diligence and collaborates with teams dedicated to assessing, prioritizing, and addressing human rights risks to our employees. These teams focus on establishing open communication with Amazon employees, providing them with meaningful grievance mechanisms, building a diverse and inclusive workplace, and keeping our employees safe. We know we have more to do, and we're committed to widening our lens to better understand the potential human rights impacts of our business. [...] We rely on experts and affected rights-holders to inform our approach and validate that our efforts have the impact we intend. Through regular stakeholder engagement and strategic partnerships, we incorporate invaluable expert input into our work, helping us achieve greater impact on people connected to our business around the world'. However, it is not clear that this engagement affected stakeholders and communication with employees is part of its Human Rights risk identification. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] & [Human Rights_web, N/A: sustainability.aboutamazon.com] • Not Met: Describes how risk identification system is triggered by new circumstances: No further details found during last revision. • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes assessment process and discloses salient HRs risks: The webpage section Human Rights indicates: 'We're committed to assessing, prioritizing, and addressing adverse human rights impacts connected to our business, and are continually working to improve our approach. At Amazon, businesses deploy a variety of mechanisms to do this. [...] Within our own operations, our central team focuses on human rights due diligence and collaborates with teams dedicated to assessing, prioritizing, and addressing human rights risks to our employees'. No details found, however, how factors such as social, economic, geographical or others were taken into account. The 2022 Modern Slavery Statement notes: 'We worked with Article One, a business and human rights consulting firm, to complete an enterprise-wide human rights saliency assessment in 2020. Through that process we identified nine salient human rights risks across our operations and business relationships, including modern slavery and forced labor. Since then, we have built on this foundation, performing human rights impact assessments (HRIAs) across a number of Amazon businesses to gain deeper understand- ing of our salient issues, including modern slavery risks. As we continue to improve and build upon our human rights due

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>diligence practices, we will leverage HRIAs to assess and address risks connected to our operations and businesses relationships. [...] Likewise, even though modern slavery can be found in all countries, we take into account region-specific risks associated with modern slavery; for example, countries with large populations of migrant workers, with weaker labor law enforcement, where charging workers recruitment fees is common practice, or where modern slavery prevalence has been well documented. Based on globally accepted risk indices (such as the Global Slavery Index and those issued by the US Department of Labor, ILO, and UNICEF), we understand that certain countries may present higher risks for modern slavery. That is why Amazon’s strategy uses a risk-based approach tailored to the regional context and implemented through both central and local programs. We continually review our supply chain footprint to evaluate where additional due diligence, partnership, and collaboration are needed’. However, region-specific consideration seems to only encompass its supply chain [which is assessed below]. [Human Rights_web, N/A: sustainability.aboutamazon.com] & [2022 Modern Slavery Satatement, 2023: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Met: Describes how process applies to supply chain: The 2022 Modern Slavery Statement notes: ‘We worked with Article One, a business and human rights consulting firm, to complete an enterprise-wide human rights saliency assessment in 2020. Through that process we identified nine salient human rights risks across our operations and business relationships, including modern slavery and forced labor. Since then, we have built on this foundation, performing human rights impact assessments (HRIAs) across a number of Amazon businesses to gain deeper understand–ing of our salient issues, including modern slavery risks. As we continue to improve and build upon our human rights due diligence practices, we will leverage HRIAs to assess and address risks connected to our operations and businesses relationships. [...] Likewise, even though modern slavery can be found in all countries, we take into account region-specific risks associated with modern slavery; for example, countries with large populations of migrant workers, with weaker labor law enforcement, where charging workers recruitment fees is common practice, or where modern slavery prevalence has been well documented. Based on globally accepted risk indices (such as the Global Slavery Index and those issued by the US Department of Labor, ILO, and UNICEF), we understand that certain countries may present higher risks for modern slavery. That is why Amazon’s strategy uses a risk-based approach tailored to the regional context and implemented through both central and local programs. We continually review our supply chain footprint to evaluate where additional due diligence, partnership, and collaboration are needed’. Also, ‘For both our operations’ supply chains (suppliers of non-inventory products and services) and our Ama–zon-branded products, our business owners engage with internal and external stakeholders, evaluate country- and industry-level risks, and conduct regular risk assessments that include worker and management interviews, document reviews, and on-site visits and audits. [...] To assess and address high-risk areas across our own operations, in 2019 we began mapping our network and, in 2020-2021, we conducted risk assessments of our vendor network across 20 countries to understand the type and severity of human rights risks in each region and vendor category’. [2022 Modern Slavery Satatement, 2023: sustainability.aboutamazon.com] • Met: Public disclosure of results of HRs risk assessment: The 2021 Sustainability Report discloses its Enterprise wide Salient Human Rights Risks: ‘Diversity, Equity, and Inclusion; Safe and Healthy; Working Conditions; Modern Slavery and Forced Labor; Fair Wages and Hours; Freedom of Association; Future of Work; Right to Privacy; Product Safety and Security; Social, Economic, and Environmental Justice’. Although the Company it is not clear its human rights assessment process, it discloses the specific issues it determined to be salient. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Met: Describes how assessment involved affected stakeholders: The 2022 Modern Slavery Statement notes: ‘For both our operations’ supply chains (suppliers of non-inventory products and services) and our Amazon-branded products, our business owners engage with internal and external stakeholders, evaluate country- and industry-level risks, and conduct regular risk assessments that include worker and management interviews, document reviews, and on-site visits and audits. For our Amazon-branded products, we also regularly consult industry experts to review our approach to risk assessment against globally recognized international standards and industry best practices. We use independent auditors to assess potential or current suppliers for modern slavery indicators. To do this, auditors conduct regular on-site inspections and confidential

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.3	Integrating and acting on human rights risks and impact assessments	1	<p>worker interviews’. [2022 Modern Slavery Statement, 2023: sustainability.aboutamazon.com]</p> <p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues: The 2022 Modern Slavery Statement notes: ‘We offer various ways for our employees to share grievances and raise concerns. Amazon offers a variety of communication mechanisms for employees, including an externally managed Ethics Line. [...] We provide a modern slavery training program for our own employees. As a global company employing over a million workers around the world, we recognize the responsibility and opportunity we have to raise awareness among our employees on human rights issues. Our forced labor awareness program makes ongoing training available to employees around the world, educating them on how to recognize indicators of forced labor and report concerns to appropriate authorities in a way that puts the interests of potential victims first. The training educates employees on the signs of human trafficking and provides guidance on how to respond in a manner that prioritizes the safety of potential victims. We train Amazon truck drivers on modern slavery prevention. We are an official corporate sponsor of Truckers Against Trafficking (TAT), an organization that exists to educate, equip, empower, and mobilize members of the trucking, bus, and energy industries to combat human trafficking. We incorporate TAT training modules into trainings for our internal fleet of drivers to teach them how to identify and respond to potential victims of human trafficking’. However, while these are preventive actions for slavery/human trafficking, the subindicator looks for a description of its global system to prevent, mitigate or remediate its salient human rights issues detected during its assessment. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: Describes how global system applies to supply chain: The 2022 Modern Slavery Statement notes: ‘In 2022, we launched a strategy for managing human rights risks across the operations supply chain. Since then, our central team has worked with operations teams to assess and address human rights risks, identify, scope and execute programs with Amazon businesses across different regions, and engage on remediation plans where non-compliances were identified. Where these assessments pointed towards a systemic issue, we worked with cross-functional teams to understand root causes and remediate issues. [...] We operate with an approach based on continuous improvement, meaning we work with suppliers to improve their practices to protect workers and improve working conditions. [...] we develop materials and sponsor workshops to empower suppliers to strengthen their own management systems and contribute to industry association and multi-stakeholder initiatives working to address systemic issues. [...] Amazon is committed to addressing deceptive recruitment practices. Our responsible recruitment capacity building program aims at gaining greater visibility into supplier and employment agency recruitment practices. Through increased due diligence and new strategic partnerships, we have deepened our understanding of recruitment practices in different regions and industries. [...] We provide a recruitment fee remediation guidebook to suppliers focused on migrant worker recruitment. The guidebook provides 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. The guidebook outlines certain provisions for suppliers to incorporate in their own policies. [...] We also encouraged suppliers to participate in external training programs, such as industry association tutorials to recognize and prevent modern slavery and implement high-quality management systems, and provided suppliers with responsible recruitment training. Since our responsible recruitment capacity-building program was first launched in 2020, we have worked with the International Organization for Migration, the Issara Institute, the Responsible Business Alliance, and Verité to offer supplier training on responsible recruitment practices. Trainings focus on modern slavery risks and responsible recruitment, including how to implement effective risk mitigation controls and identify issues in recruitment and hiring processes for migrant workers’. However, despite evidence shows some example, the subindicator looks for a description of its global system to prevent, mitigate or remediate its salient human rights issues detected during its assessment in its supply chain. It is not clear how the system covers the different salient issues it faces. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Met: Example of actions decided on at least 1 salient HRs issue: The Company reports in its MSA 2020: ‘The issue: In Japan, many foreign migrant workers come

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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'. Also, see first subindicator. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
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: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
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 [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: Describes 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 mechanism(s) for 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: Grievance mechanism 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] & [2022 Proxy Statement, 2022: s2.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Grievance mechanism available in appropriate languages and workers made aware: The 2021 Modern Slavery Statement indicates: 'Employees may raise questions or report suspected violations of our Code through Amazon's Ethics Line, by phone or online. Employees have made reports from 63 countries in over 30 languages of the 165 languages available to them. [...] All Amazon employees take mandatory compliance training courses on the Code'. 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'. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] & [Code of Business and Ethics - Website, N/A: ir.aboutamazon.com] Met: Describes how workers in supply chain access grievance mechanism: The Supply Chain Standards indicates: 'All workers must be free to voice their concerns and seek resolution of issues covered by these Standards in a confidential and anonymous manner free from retaliation. Suppliers are required to create and maintain an equitable and effective grievance mechanism, for workers to submit their grievances'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] Met: Expects suppliers to convey expectation to their suppliers: See above. The Supply Chain Standards indicates: 'Workers employed by subcontractors must have a mechanism in place to bring their concerns to management teams above the subcontractor'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]
C.2	Grievance mechanism(s) for external individuals and communities	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 accessible to all external individuals and communities <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware Not Met: Describes how external individuals/communities access grievance mechanism: The Supply Chain Standards indicates: 'Suppliers are required to create and maintain an equitable and effective grievance mechanism, for workers to submit their grievances'. However, requirement focuses on workers. It is not clear whether suppliers' external stakeholders can file complaints. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] Not Met: Expects supplier to convey expectation to their suppliers
C.3	Users are involved in the design and performance of the mechanism(s)	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 how users engaged on design and performance Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Describes how users engaged on improvement of mechanism Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	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 procedure and timescales for managing complaints or concerns: The 2022 Modern Slavery Statement provides information on its different grievance mechanisms, including Worker Voice program and the Ethics Line. However, no details found in relation to timescales for addressing complaints and process for informing complainant. [2022 Modern Slavery Statement, 2023: sustainability.aboutamazon.com] Not Met: Describes technical, financial, advisory support to enable equal access <p>Score 2</p> <ul style="list-style-type: none"> Not Met: Describe types of outcome to complainant through use of mechanism Not Met: Describes escalation to senior levels / independent adjudicators: The 2021 Sustainability Report indicates: 'suggestions or complaints emailed to a member of the senior leadership team are considered Executive Escalations. Any

Indicator Code	Indicator name	Score (out of 2)	Explanation
			employee can utilize this method of providing a suggestion or raising a concern to leadership. All escalations are independently reviewed by Human Resources, used as a learning opportunity, and may be used to update our processes to prevent gaps in the future'. However, it is not clear all external individuals and communities may have access to escalation of complaints to challenge the process or outcome at the complainant's discretion. [Sustainability report 2020, 2021: sustainability.aboutamazon.com]
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation against workers/stakeholders: 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'. Still in the context of the Code, the 2022 Modern Slavery Statement notes: 'Amazon provides various secure and accessible channels, with guidelines for reporting concerns and violations. Employees can reach out to anyone in their management chain or the Legal Department with questions about the application of the Code of Conduct or how to approach difficult workplace situations. Employees may also make reports online or via phone through the Amazon Ethics Line, which is managed by an independent third party, and remain anonymous on request. The Ethics Line is currently available in more than 60 countries in 165 languages. Any employee can also email suggestions or complaints to senior leadership. All escalations are reviewed by Human Resources and may inform process updates to prevent future gaps. We do not allow retaliation and take all allegations seriously. Our Business Conduct and Ethics team records, investigates (or directs others to investigate), and reports alleged violations of the Code of Conduct, tracking any remediation required. Employees must cooperate in internal investigations of potential or alleged misconduct, with those who violate the Code of Conduct subject to disciplinary action up to and including discharge'. 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] & [2022 Modern Slavery Statement, 2023: sustainability.aboutamazon.com] • Met: Describes practical measures to prevent retaliation: The 2021 Sustainability Report indicates: 'Reports to the Ethics Line are answered by an independent third party and may be made anonymously on request'. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence • Not Met: Expects suppliers to prohibit retaliation against workers/stakeholders: In its Supply Chain Standards, the Company indicates that it 'Suppliers must protect worker whistle-blower confidentiality and prohibit retaliation against worker whistle-blowers, who in good faith report improper conduct (for example, related to environmental or human rights violations, workplace grievances, and unethical business practices) by a Supplier or an employee or officer of a Supplier'. However, it is not clear this prohibition of retaliation also covers individual stakeholders and communities at supplier level, as it is not clear the mechanism is open to them. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse 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: Describes approach taken to remedy adverse HRs impacts: The 2021 Modern Slavery Statement indicates: 'in cases of worker- paid recruitment fees, we identify where workers migrated from and how they were recruited and if they paid any recruitment fees. Charging workers recruitment fees is not permitted under Amazon's Supply Chain Standards. Where fees were found to have been charged, we support our suppliers to understand ethical recruitment practices and implement plans 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.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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). [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how remedy would be provided if no adverse impact identified [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
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: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The 2021 Sustainability Report indicates: 'In 2021, workers placed 530 calls to the helpline—86% related to labor issues and 4.6% related to safety issues. These cases are resolved directly in partnership with factory management in line with the helpline's protocols'. However, these figures make specific reference to Amader Kotha Helpline, for some of the Company's Bangladeshi suppliers. No further information found including the number of grievances about human rights issues filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities that may be adversely impacted by the Company. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] • Not Met: Example of how lessons from mechanism improved HRs management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

D.1 Food and 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: Requirements on living wage in supplier codes and contracts: The Supply Chain Standards indicates: 'Suppliers are required to pay their workers, including contract workers and those paid by piece rate, in a timely manner and provide compensation (including minimum wages and allowances, overtime pay, benefits, and paid leave) in a manner that satisfies or exceeds applicable laws. In countries where such laws do not exist, Suppliers are encouraged to pay wages that meet or exceed industry average, pay overtime at a rate exceeding the regular hourly compensation rate, and maintain policies that provide worker benefits, such as leave. [...] Suppliers should regularly review worker salaries to evaluate whether workers earn enough to meet their basic needs and the needs of their family and adjust accordingly at least every two years'. However, the last provision is not a requirement and it does not include a reference to discretionary income. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work with suppliers on living wage <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of payment below living wage in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes practices to avoid price or short notice requirements that undermine HRs: The 2021 Sustainability Report indicates: ‘Supplier feedback on our purchasing practices is important in understanding how we can improve supplier relationships and understanding our potential impact on human rights in our supply chain. In 2021, Amazon partnered with the Better Buying Institute to capture anonymous supplier feedback on our purchasing practices through an annual survey. Benchmarked against industry peers, we identified key areas, including planning and forecasting, supplier engagement, and on-time payments, where we can improve practices to drive a better supplier experience of working with Amazon. In 2021, Amazon partnered with Better Buying and other brands to create an e-learning course to raise awareness about the importance of the issue’. However, although the Company indicates it is working to improve purchasing practices, no description found of the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights’. Previous assessment was based on evidence which no longer seems to be available. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] • Not Met: Describes practices to pay suppliers in line with agreed timeframes • Not Met: Reviews own operations to mitigate negative impact of purchasing practices <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of purchasing practices: As indicated above: ‘Supplier feedback on our purchasing practices is important in understanding how we can improve supplier relationships and understanding our potential impact on human rights in our supply chain. In 2021, Amazon partnered with the Better Buying Institute to capture anonymous supplier feedback on our purchasing practices through an annual survey. Benchmarked against industry peers, we identified key areas, including planning and forecasting, supplier engagement, and on-time payments, where we can improve practices to drive a better supplier experience of working with Amazon. In 2021, Amazon partnered with Better Buying and other brands to create an e-learning course to raise awareness about the importance of the issue’. However, no example found of how it has addressed, and made changes to its purchasing practices to avoid undermining its human rights commitments. Previous assessment was based on evidence which no longer seems to be available. [2021 Sustainability report, 2022: 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 including manufacturing sites: 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 supply chain and how significance was defined: The webpage section Human Rights indicates: ‘We publish an interactive supply chain map that provides details on suppliers of Amazon-branded [...] food and beverage [...]’. However, it is not clear it includes indirect suppliers. [Human Rights_web, N/A: sustainability.aboutamazon.com] & [Around the Globe Map, N/A: sustainability.aboutamazon.com] • Not Met: Discloses direct or indirect suppliers involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.4.b	Prohibition of child labour: Age verification and corrective actions (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: Requirements on child labour in supplier codes and contracts: The Supply Chain Standards indicates: 'Amazon does not tolerate the use of child labor. Suppliers are required to engage workers who are: (i) at least 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. Workers under the age of 18 ("young workers") must not perform hazardous work, including that which is likely to jeopardize their health or safety, or work that compromises their education (e.g., night shifts, overtime). [...] Suppliers should implement an age verification mechanism. [...] Cases of child labor must be remediated, including through corrective measures that facilitate the child's safety and wellbeing'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work with suppliers on eliminating 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. The webpage section Supply Chain Commitments indicates: 'The UN designated 2021 as International Year for the Elimination of Child Labour. Building on our work with The Centre for Child Rights and Business, Amazon committed to the Joint Action Pledge to strengthen the protection of children's rights and accelerate action to address child labor in global supply chains. Through this commitment, we will work with other retailers to further extend due diligence, remediation, and monitoring activities. This will enable us to increase our understanding of child labor in supply chains, deliver programs to support juvenile workers, build the capabilities of suppliers to address child labor, work collaboratively as a group to share learnings, and establish best practices to address child labor'. However, it is not clear how it works with suppliers to eliminate child labour and to improve working conditions for young workers where relevant. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] & [Supply Chain Commitments_web, N/A: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of child labour in supply chain • Not Met: Analysis of trends demonstrating progress
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: Requirements on debt/fees in supplier codes and contracts: The Supply Chain Standards indicates: 'Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees or costs for their employment either in their home country, any intermediate country, or the country where work is performed. Suppliers should recruit workers in a manner that prevents worker-paid fees. Suppliers may not require workers to make any financial deposits into accounts. If workers have paid fees in violation of these Standards, Suppliers are required to bear or reimburse to 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. Repayment of worker-paid fees should be done in a manner that protects workers and their families from harm and retaliation. All fees and expenses charged to workers must be disclosed to Amazon and communicated to workers in their native language and in advance of employment or work'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes work with suppliers on debt/fees for job seekers/workers: The 2021 Modern Slavery Statement indicates: 'In 2021 we provided a guidebook to suppliers focused on migrant worker recruitment. The guidebook provides 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. [...] In 2021, the guidebook was shared with over 70 suppliers where recruitment fee issues were identified. We provided suppliers with responsible recruitment training. In 2021, we partnered with the Responsible Business Alliance and the International Organization for Migration to offer training on responsible recruitment practices to over 50 suppliers and offered worker awareness training for sites in a high-risk region to improve foreign migrant workers' livelihood. These training programs focused on modern slavery risks and the importance of responsible recruitment, including teaching participants how to implement effective risk mitigation controls, identify issues in their recruitment and hiring processes for migrant workers, and draft an implementation plan for addressing these issues'. However, it is not clear if these measures were applied in agricultural supply chain, as RBA work focuses in ICT sector. [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of payment of recruitment fees in supply chain • Met: Analysis of trends demonstrating progress: 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: Requirements on paying in full and on time in supplier codes and contracts: The Supply Chain Standards indicates: 'Suppliers are required to pay their workers, including contract workers and those paid by piece rate, in a timely manner [...]. Deductions from wages as a disciplinary measure are not permitted. Suppliers are encouraged to transition from cash payments to digital wage payment systems'. No evidence found, however, of suppliers being formally required to pay in full. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on paying workers regularly, in full and on time • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: Analysis of trends demonstrating progress
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: Requirements on free movement in supplier codes and contracts: The Supply Chain Standards indicates: 'All work must be voluntary. Workers must be free to leave work and terminate their employment or other work status with reasonable notice, without penalty. There shall be no unreasonable restrictions on workers' freedom of movement in any Supplier-controlled facility. [...] Suppliers must not hold (for safekeeping), destroy, conceal, confiscate, or require workers to surrender government issued identification, passports, immigration documents, or work permits to any party, including third party agents. Suppliers may only temporarily hold onto such documents to the extent required by law to complete administrative and immigration processing'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes working with suppliers on free movement of workers • Not Met: Assessment of scope of restriction of movement in supply chain

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: 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: Requirements on FoA/CB in suppliers codes and contracts: The Supply Chain Standards indicates: 'Suppliers must respect the rights of workers to form, join, or refrain from joining, a labor union or other lawful organization of their own selection. Suppliers must respect workers' rights to freedom of association and collective bargaining. Workers must not be penalized or subjected to reprisal, harassment, or intimidation for the non-violent exercise of these rights'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'lawful organization'. In these cases (companies referring to local laws in freedom of association and collective bargaining), Companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work with suppliers on FoA/CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: 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: Requirements on H&S in supplier codes and contracts: The Company includes health and safety requirements in its Supply Chain Standards, including provisions with respect the following topics: Health and Safety; Safe Working Conditions, Occupational Safety, and Industrial Hygiene; Physically Demanding Work; Emergency Preparedness and Response; Machine Safeguarding; Sanitation and Hygiene; Housing. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Discloses injury rate or lost days in supply chain in last reporting period • Not Met: Discloses fatalities for workers in supply chain in last reporting period • Not Met: Discloses occupational disease rate in supply chain in last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers of H&S: The webpage section Supply Chain Commitments indicates: 'To provide programs to workers in our supply chain, we partner with Swasti, a global non-profit committed to ensuring access to quality health care for workers in marginalized communities. As of 2021, Swasti had reached over 1,200 workers in Amazon's supply chain in India, providing critical mental health, health care, and social entitlement support to workers, their families, and their communities. Swasti provides a telecare health counselling program, factory management training on COVID-19 prevention and management, and screening for harmful health conditions, including hypertension and diabetes'. However, although the Company indicates it helps suppliers' workers, it is not clear how it proactively works together with its agricultural suppliers to improve their practices in relation to health and safety. [Supply Chain Commitments_web, N/A: sustainability.aboutamazon.com] • Not Met: Assessment of scope of H&S issues in supply chain • Not Met: 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	<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: Requirements on land and tenure rights in supplier codes and contracts: Regarding Land Rights, the Company indicates in its Supply Chain Standards: 'Suppliers must respect the legal land rights of individuals, indigenous people, and local communities, inclusive of their established public, private, communal, collective, indigenous, and customary rights over natural resources (e.g., fisheries, forests, and water). Suppliers may not engage in land grabbing or illegal use of land or natural resources in our supply chain. Supplier utilization of land and natural resources, including acquisition, development, or lease are subject to Free, Prior, and Informed Consent (FPIC) of the affected local communities, such as women, indigenous peoples, and other marginalized stakeholders. Upon Amazon's request, Suppliers are required to demonstrate a legal right to use land and/or natural resources'. However, no requirement found [in the supplier code of conduct] to have a process to identify legitimate tenure rights holders when acquiring, leasing or making other arrangements to use, with particular attention to vulnerable or marginalised tenure rights holders, and to negotiate with them to provide adequate compensation or requested alternatives to financial compensation. Previous assessment was based on a version of the Supply Chain Standards which seems to have been replaced in 2023. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work with suppliers on land issues <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requirement for suppliers to provide compensation in resettlement • Not Met: Assessment of scope of land rights issues in supply chain • Not Met: 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: Requirements on access to water and sanitation in supplier codes and contracts: The Supply Chain Standards indicates: 'we encourage suppliers to reduce consumption of other natural resources, including water. [...] We encourage Suppliers to implement a water management program that documents, characterizes, and monitors water sources, use, and discharge; seeks opportunities to conserve water; and controls channels of contamination. [...] Suppliers must respect [...] customary rights over natural resources ([...] water). [...] We encourage Suppliers to establish practices that enable workers to take adequate rest and water breaks during their shifts. [...] Suppliers must provide workers with safe, sanitary conditions in all Supplier-controlled worker environments. Workers must have reasonable and unrestricted access to basic hygiene facilities (e.g., handwashing stations, safe potable drinking water, clean toilet facilities, waste receptacles) at all Supplier-controlled worker environments. We encourage Suppliers to provide toilet facilities that accommodate the number of workers and privacy for the individual. [...] Suppliers should minimize adverse impacts on the environment, (including reducing the [...] use of water [...])'. However, it is not clear if there is a formal requirement to respect water as a human right in the context of not affecting access to water for people in the vicinity of operations. Current evidence seems to focus in workers access to water and facilities at work [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work with suppliers on access to water: 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 further details found during last revision. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of water and sanitation issues in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.1.10.b	Women's rights (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on women's rights in supplier codes and contracts: The Supply Chain Standards indicates: 'Suppliers must have an equal opportunity employment policy that promotes gender equity in employment practices. Suppliers must not discriminate against people who are pregnant, lactating parents, or workers returning from parental leave, and Suppliers should have a parental leave policy that prohibits this. [...] Suppliers are prohibited from inquiring about a worker's marital, pregnancy, or parental status as a criterion for hiring or continued employment. Suppliers must not request or require pregnancy, virginity, or HIV tests, and they must not coerce or pressure women to use or not use contraception or discriminate against them for their reproductive choices. [...] Suppliers to provide programs for underrepresented workers (e.g., women) to increase their opportunities for career advancement. [...] Suppliers are required to provide equal pay for work of "equal or comparable value", without discrimination. [...] Suppliers should monitor for workplace health and safety risks that may impact people who are pregnant or lactating and take reasonable steps to remove or mitigate these risks, inform them of any hazards, and provide reasonable accommodations'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Met: Describes work 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 2020, 2021: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of women's rights issues in supply chain • Not Met: 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: Requirements on living wage in supplier codes and contracts: The Supply Chain Standards indicates: 'Suppliers are required to pay their workers, including contract workers and those paid by piece rate, in a timely manner and provide compensation (including minimum wages and allowances, overtime pay, benefits, and paid leave) in a manner that satisfies or exceeds applicable laws. In countries where such laws do not exist, Suppliers are encouraged to pay wages that meet or exceed industry average, pay overtime at a rate exceeding the regular hourly compensation rate, and maintain policies that provide worker benefits, such as leave. [...] Suppliers should regularly review worker salaries to evaluate whether workers earn enough to meet their basic needs and the needs of their family and adjust accordingly at least every two years'. However, the last provision is not a requirement and it does not include a reference to discretionary income. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work with suppliers on living wage <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of payment below living wage in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.2.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes practices to avoid price or short notice requirements that undermine HRs: The 2021 Sustainability Report indicates: 'Supplier feedback on our purchasing practices is important in understanding how we can improve supplier relationships and understanding our potential impact on human rights in our supply chain. In 2021, Amazon partnered with the Better Buying Institute to capture anonymous supplier feedback on our purchasing practices through an annual survey. Benchmarked against industry peers, we identified key areas, including planning and forecasting, supplier engagement, and on-time payments, where we can improve practices to drive a better supplier experience of working with Amazon. In 2021, Amazon partnered with Better Buying and other brands to create an e-learning course to raise awareness about the importance of the issue'. However, although the Company indicates it is working to improve purchasing practices, no description found of the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights'. Previous assessment was based on evidence which no longer seems to be available. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] • Not Met: Describes practices to pay suppliers in line with agreed timeframes • Not Met: Reviews own operations to mitigate negative impact of purchasing practices <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of purchasing practices: As indicated above: 'Supplier feedback on our purchasing practices is important in understanding how we can improve supplier relationships and understanding our potential impact on human rights in our supply chain. In 2021, Amazon partnered with the Better Buying Institute to capture anonymous supplier feedback on our purchasing practices through an annual survey. Benchmarked against industry peers, we identified key areas, including planning and forecasting, supplier engagement, and on-time payments, where we can improve practices to drive a better supplier experience of working with Amazon. In 2021, Amazon partnered with Better Buying and other brands to create an e-learning course to raise awareness about the importance of the issue'. However, no example found of how it has addressed, and made changes to its purchasing practices to avoid undermining its human rights commitments. Previous assessment was based on evidence which no longer seems to be available. [2021 Sustainability report, 2022: 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 including manufacturing sites: 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 supply chain and how significance was defined: The webpage section Human Rights indicates: 'We publish an interactive supply chain map that provides details on suppliers of Amazon-branded apparel [...]'. It includes names and addresses. However, it is not clear it includes indirect suppliers. [Human Rights_web, N/A: sustainability.aboutamazon.com] & [Around the Globe Map, N/A: sustainability.aboutamazon.com] • Not Met: Discloses direct or indirect suppliers 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)	0.5	<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: Requirements on child labour in supplier codes and contracts: The Supply Chain Standards indicates: 'Amazon does not tolerate the use of child labor. Suppliers are required to engage workers who are: (i) at least 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. Workers under the age of 18 ("young workers") must not perform hazardous work, including that which is likely to jeopardize their health or safety, or work that compromises their education (e.g., night shifts, overtime). [...] Suppliers should implement an age verification mechanism. [...] Cases of child labor must be remediated, including through corrective measures that facilitate the child's safety and wellbeing'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work with suppliers on eliminating 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. No further details found during last revision. [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: Assessment of scope of child labour in supply chain • Not Met: Analysis of trends demonstrating progress
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: Requirements on debt/fees in supplier codes and contracts: The Supply Chain Standards indicates: 'Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees or costs for their employment either in their home country, any intermediate country, or the country where work is performed. Suppliers should recruit workers in a manner that prevents worker-paid fees. Suppliers may not require workers to make any financial deposits into accounts. If workers have paid fees in violation of these Standards, Suppliers are required to bear or reimburse to 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. Repayment of worker-paid fees should be done in a manner that protects workers and their families from harm and retaliation. All fees and expenses charged to workers must be disclosed to Amazon and communicated to workers in their native language and in advance of employment or work'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes work with suppliers on debt/fees for job seekers/workers: 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 scope of payment of recruitment fees in supply chain • Met: Analysis of trends demonstrating progress: 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: Requirements on paying in full and on time in supplier codes and contracts: The Supply Chain Standards indicates: 'Suppliers are required to pay their workers, including contract workers and those paid by piece rate, in a timely manner [...]. Deductions from wages as a disciplinary measure are not permitted. Suppliers are encouraged to transition from cash payments to digital wage payment systems'. No evidence found, however, of suppliers being formally required to pay in full. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work with suppliers on paying workers regularly, in full and on time <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: 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: Requirements on free movement in supplier codes and contracts: The Supply Chain Standards indicates: 'All work must be voluntary. Workers must be free to leave work and terminate their employment or other work status with reasonable notice, without penalty. There shall be no unreasonable restrictions on workers' freedom of movement in any Supplier-controlled facility. [...] Suppliers must not hold (for safekeeping), destroy, conceal, confiscate, or require workers to surrender government issued identification, passports, immigration documents, or work permits to any party, including third party agents. Suppliers may only temporarily hold onto such documents to the extent required by law to complete administrative and immigration processing'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes working with suppliers on free movement of workers: The webpage section Supply Chain Commitments indicates: 'In 2021, we expanded our relationships with key external partners RBA and the International Organization for Migration (IOM). We also began partnering with the Issara Institute to address issues of human trafficking and forced labor through worker voice, partnership, and innovation. We're working with these organizations to better understand hotspots across our supply chain so that the rights of workers vulnerable to forced labor continue to be respected and promoted. We're also working with them to leverage collective industry responses for improved due diligence and develop impactful risk mitigation strategies that put the interests of workers first. Additionally, we expanded our training on responsible recruitment practices to over 50 suppliers through the RBA's Responsible Labor Initiative and IOM. We also offered worker awareness training to workers at sites in high-risk regions to improve the well-being of foreign migrant workers. These training programs focused on modern slavery risks and the importance of responsible recruitment, including teaching participants how to implement effective risk mitigation controls, identify issues in their recruitment and hiring processes for migrant workers, and draft an implementation plan for addressing these issues'. However, no further information found describing how the Company actively works with its apparel suppliers on freedom of movement matters. [Supply Chain Commitments_web, N/A: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain • Met: 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: Requirements on FoA/CB in suppliers codes and contracts: The Supply Chain Standards indicates: 'Suppliers must respect the rights of workers to form, join, or refrain from joining, a labor union or other lawful organization of their own selection. Suppliers must respect workers' rights to freedom of association and collective bargaining. Workers must not be penalized or subjected to reprisal, harassment, or intimidation for the non-violent exercise of these rights'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'lawful organization'. In these cases (companies referring to local laws in freedom of association and collective bargaining), Companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work with suppliers on FoA/CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: 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: Requirements on H&S in supplier codes and contracts: The Company includes health and safety requirements in its Supply Chain Standards, including provisions with respect the following topics: Health and Safety; Safe Working Conditions, Occupational Safety, and Industrial Hygiene; Physically Demanding Work; Emergency Preparedness and Response; Machine Safeguarding; Sanitation and Hygiene; Housing. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Discloses injury rate or lost days in supply chain in last reporting period • Not Met: Discloses fatalities for workers in supply chain in last reporting period • Not Met: Discloses occupational disease rate in supply chain in last reporting period

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes work with suppliers of H&S: The webpage section Supply Chain Commitments indicates: 'In 2021, we continued to strengthen our mechanisms to address and improve workplace safety by conducting building, electrical, and fire safety assessments for at-risk suppliers in Bangladesh and Pakistan. We also trained selected suppliers on how to improve management systems and workplace dialogue, and created issue-specific guidebooks to enable suppliers to better understand the root causes of these issues and help prevent issues from occurring. In 2021, we expanded our work with the Sustaining Competitive and Responsible Enterprises (SCORE) program, a lean manufacturing program focused on improving productivity and safe working conditions in small and medium-sized manufacturers, with an emphasis on worker participation as an essential component to strong safety management practices. Through an independent assessment of the program, we found a reduction in health and safety findings and accidents, and increases in productivity and worker satisfaction'. [Supply Chain Commitments_web, N/A: sustainability.aboutamazon.com] • Not Met: Assessment of scope of H&S issues in supply chain • Not Met: Analysis of trends demonstrating progress
D.2.8.b	Women's rights (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on women's rights in contracts/codes with suppliers: The Supply Chain Standards indicates: 'Suppliers must have an equal opportunity employment policy that promotes gender equity in employment practices. Suppliers must not discriminate against people who are pregnant, lactating parents, or workers returning from parental leave, and Suppliers should have a parental leave policy that prohibits this. [...] Suppliers are prohibited from inquiring about a worker's marital, pregnancy, or parental status as a criterion for hiring or continued employment. Suppliers must not request or require pregnancy, virginity, or HIV tests, and they must not coerce or pressure women to use or not use contraception or discriminate against them for their reproductive choices. [...] Suppliers to provide programs for underrepresented workers (e.g., women) to increase their opportunities for career advancement. [...] Suppliers are required to provide equal pay for work of "equal or comparable value", without discrimination. [...] Suppliers should monitor for workplace health and safety risks that may impact people who are pregnant or lactating and take reasonable steps to remove or mitigate these risks, inform them of any hazards, and provide reasonable accommodations'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Met: Describes work 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 2020, 2021: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of unsafe working conditions/discrimination against women in supply chain • Not Met: 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: Requirements on working hours in codes/contracts with suppliers: The Supply Chain Standards indicates: 'Suppliers should regularly monitor working hours to maintain 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. Suppliers are required to provide workers with legally required breaks, or reasonable breaks where the law is silent'. However, no evidence found of references to international standards on standard weekly hours concerning maximum hours and minimum breaks. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes work 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 further details found during last revision. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of excessive working hours in supply chain: The 2022 Modern Slavery Statement discloses information on audit findings, including: 'Incomplete employment information - Employment documentation did not include relevant information on the nature of work, working hours, wages, leave, benefits, fees, or deductions' 2020: 10.1%; 2021 5.6%, 2022: 3.7%. However, no assessment found of the number of people affected by (scope of) excessive working hours in its supply chain. [2022 Modern Slavery Satatement, 2023: sustainability.aboutamazon.com] • Met: Analysis of trends demonstrating progress: 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: Requirements on living wage in supplier codes and contracts: The Supply Chain Standards indicates: 'Suppliers are required to pay their workers, including contract workers and those paid by piece rate, in a timely manner and provide compensation (including minimum wages and allowances, overtime pay, benefits, and paid leave) in a manner that satisfies or exceeds applicable laws. In countries where such laws do not exist, Suppliers are encouraged to pay wages that meet or exceed industry average, pay overtime at a rate exceeding the regular hourly compensation rate, and maintain policies that provide worker benefits, such as leave. [...] Suppliers should regularly review worker salaries to evaluate whether workers earn enough to meet their basic needs and the needs of their family and adjust accordingly at least every two years'. However, the last provision is not a requirement and it does not include a reference to discretionary income. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on living wage • Not Met: Assessment of scope of payment below living wage in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.2	Aligning purchasing decisions with human rights	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Describes practices to avoid price or short notice requirements that undermine HRs: The 2021 Sustainability Report indicates: 'Supplier feedback on our purchasing practices is important in understanding how we can improve supplier relationships and understanding our potential impact on human rights in our supply chain. In 2021, Amazon partnered with the Better Buying Institute to capture anonymous supplier feedback on our purchasing practices through an annual survey. Benchmarked against industry peers, we identified key areas, including planning and forecasting, supplier engagement, and on-time payments, where we can improve practices to drive a better supplier experience of working with Amazon. In 2021, Amazon partnered with Better Buying and other brands to create an e-learning course to raise awareness about the importance of the issue'. However, although the Company indicates it is working to improve purchasing practices, no description found of the practices it adopts to avoid price or short notice requirements or other business considerations undermining human rights'. Previous assessment was based on evidence which no longer seems to be available. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] • Not Met: Describes practices to pay suppliers in line with agreed timeframes • Not Met: Reviews own operations to mitigate negative impact of purchasing practices <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Example of assessing and changing of purchasing practices: As indicated above: 'Supplier feedback on our purchasing practices is important in understanding how we can improve supplier relationships and understanding our potential impact on human rights in our supply chain. In 2021, Amazon partnered with the Better Buying Institute to capture anonymous supplier feedback on our purchasing practices through an annual survey. Benchmarked against industry peers, we identified key areas, including planning and forecasting, supplier engagement, and on-time payments, where we can improve practices to drive a better supplier experience of working with Amazon. In 2021, Amazon partnered with Better Buying and other brands to create an e-learning course to raise awareness about the importance of the issue'. However, no example found of how it has addressed, and made changes to its purchasing practices to avoid undermining its human rights commitments. Previous assessment was based on evidence which no longer seems to be available. [2021 Sustainability report, 2022: 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 including manufacturing sites: 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 supply chain and how significance was defined: The webpage section Human Rights indicates: 'We publish an interactive supply chain map that provides details on suppliers of Amazon-branded [...] consumer electronics, [...]'. It includes names and addresses. However, it is not clear it includes indirect suppliers. [Human Rights_web, N/A: sustainability.aboutamazon.com] • Not Met: Discloses direct or indirect suppliers involved in higher-risk activities

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.4.b	Prohibition of child labour: Age verification and corrective actions (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: Requirements on child labour in supplier codes and contracts: The Supply Chain Standards indicates: 'Amazon does not tolerate the use of child labor. Suppliers are required to engage workers who are: (i) at least 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. Workers under the age of 18 ("young workers") must not perform hazardous work, including that which is likely to jeopardize their health or safety, or work that compromises their education (e.g., night shifts, overtime). [...] Suppliers should implement an age verification mechanism. [...] Cases of child labor must be remediated, including through corrective measures that facilitate the child's safety and wellbeing'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work with suppliers on eliminating 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. No further details found during last revision. [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: Assessment of scope of child labour in supply chain • Not Met: Analysis of trends demonstrating progress
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: Requirements on debt/fees in supplier codes and contracts: The Supply Chain Standards indicates: 'Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees or costs for their employment either in their home country, any intermediate country, or the country where work is performed. Suppliers should recruit workers in a manner that prevents worker-paid fees. Suppliers may not require workers to make any financial deposits into accounts. If workers have paid fees in violation of these Standards, Suppliers are required to bear or reimburse to 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. Repayment of worker-paid fees should be done in a manner that protects workers and their families from harm and retaliation. All fees and expenses charged to workers must be disclosed to Amazon and communicated to workers in their native language and in advance of employment or work'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Describes work with suppliers on debt/fees for job seekers/workers: The 2021 Modern Slavery Statement indicates: 'In 2021 we provided a guidebook to suppliers focused on migrant worker recruitment. The guidebook provides 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. [...] In 2021, the guidebook was shared with over 70 suppliers where recruitment fee issues were identified. We provided suppliers with responsible recruitment training. In 2021, we partnered with the Responsible Business Alliance and the International Organization for Migration to offer training on responsible recruitment practices to over 50 suppliers and offered worker awareness training for sites in a high-risk region to improve foreign migrant workers' livelihood. These training programs focused on modern slavery risks and the importance of responsible recruitment, including teaching participants how to implement effective risk mitigation controls, identify issues in their recruitment and hiring processes for migrant workers, and draft an implementation plan for addressing these issues' [Modern Day Slavery Statement 2020, 06/2021: sustainability.aboutamazon.com] Score 2 • Not Met: Assessment scope of payment of recruitment fees in supply chain • Met: Analysis of trends demonstrating progress: 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: Requirements on paying in full and on time in supplier codes and contracts: The Supply Chain Standards indicates: 'Suppliers are required to pay their workers, including contract workers and those paid by piece rate, in a timely manner [...]. Deductions from wages as a disciplinary measure are not permitted. Suppliers are encouraged to transition from cash payments to digital wage payment systems'. No evidence found, however, of suppliers being formally required to pay in full. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers on paying workers regularly, in full and on time • Not Met: Assessment scope of failure to pay workers in full and on time in supply chain • Not Met: 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: Requirements on free movement in supplier codes and contracts: The Supply Chain Standards indicates: 'All work must be voluntary. Workers must be free to leave work and terminate their employment or other work status with reasonable notice, without penalty. There shall be no unreasonable restrictions on workers' freedom of movement in any Supplier-controlled facility. [...] Suppliers must not hold (for safekeeping), destroy, conceal, confiscate, or require workers to surrender government issued identification, passports, immigration documents, or work permits to any party, including third party agents. Suppliers may only temporarily hold onto such documents to the extent required by law to complete administrative and immigration processing'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Describes working with suppliers on free movement of workers: The webpage section Supply Chain Commitments indicates: 'In 2021, we expanded our relationships with key external partners RBA and the International Organization for Migration (IOM). We also began partnering with the Issara Institute to address issues of human trafficking and forced labor through worker voice, partnership, and innovation. We're working with these organizations to better understand hotspots across our supply chain so that the rights of workers vulnerable to forced labor continue to be respected and promoted. We're also working with them to leverage collective industry responses for improved due diligence and develop impactful risk mitigation strategies that put the interests of workers first. Additionally, we expanded our training on responsible recruitment practices to over 50 suppliers through the RBA's Responsible Labor Initiative and IOM. We also offered worker awareness training to workers at sites in high-risk regions to improve the well-being of foreign migrant workers. These training programs focused on modern slavery risks and the importance of responsible recruitment, including teaching participants how to implement effective risk mitigation controls, identify issues in their recruitment and hiring processes for migrant workers, and draft an implementation plan for addressing these issues'. However, no further information found describing how the Company actively works with its suppliers on freedom of movement matters. [Supply Chain Commitments_web, N/A: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of movement in supply chain • Met: 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: Requirements on FoA/CB in suppliers codes and contracts: The Supply Chain Standards indicates: 'Suppliers must respect the rights of workers to form, join, or refrain from joining, a labor union or other lawful organization of their own selection. Suppliers must respect workers' rights to freedom of association and collective bargaining. Workers must not be penalized or subjected to reprisal, harassment, or intimidation for the non-violent exercise of these rights'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'lawful organization'. In these cases (companies referring to local laws in freedom of association and collective bargaining), Companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work with suppliers on FoA/CB <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of restriction of FoA/CB in supply chain • Not Met: 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: Requirements on H&S in supplier codes and contracts: The Company includes health and safety requirements in its Supply Chain Standards, including provisions with respect the following topics: Health and Safety; Safe Working Conditions, Occupational Safety, and Industrial Hygiene; Physically Demanding Work; Emergency Preparedness and Response; Machine Safeguarding; Sanitation and Hygiene; Housing. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Discloses injury rate or lost days in supply chain in last reporting period • Not Met: Discloses fatalities for workers in supply chain in last reporting period • Not Met: Discloses occupational disease rate in supply chain in last reporting period <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes work with suppliers of H&S • Not Met: Assessment of scope of H&S issues in supply chain • Not Met: Analysis of trends demonstrating progress

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.4.8.b	Women's rights (in the supply chain)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Requirements on women's rights in contracts/codes with suppliers: The Supply Chain Standards indicates: 'Suppliers must have an equal opportunity employment policy that promotes gender equity in employment practices. Suppliers must not discriminate against people who are pregnant, lactating parents, or workers returning from parental leave, and Suppliers should have a parental leave policy that prohibits this. [...] Suppliers are prohibited from inquiring about a worker's marital, pregnancy, or parental status as a criterion for hiring or continued employment. Suppliers must not request or require pregnancy, virginity, or HIV tests, and they must not coerce or pressure women to use or not use contraception or discriminate against them for their reproductive choices. [...] Suppliers to provide programs for underrepresented workers (e.g., women) to increase their opportunities for career advancement. [...] Suppliers are required to provide equal pay for work of "equal or comparable value", without discrimination. [...] Suppliers should monitor for workplace health and safety risks that may impact people who are pregnant or lactating and take reasonable steps to remove or mitigate these risks, inform them of any hazards, and provide reasonable accommodations'. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Met: Describes work 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 2020, 2021: sustainability.aboutamazon.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of women's rights issues in supply chain • Not Met: Analysis of trends demonstrating progress
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: Requirements on working hours in codes/contracts with suppliers: The Supply Chain Standards indicates: 'Suppliers should regularly monitor working hours to maintain 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. Suppliers are required to provide workers with legally required breaks, or reasonable breaks where the law is silent'. However, no evidence found of references to international standards on standard weekly hours concerning maximum hours and minimum breaks. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] • Not Met: Describes work 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 further details found during last revision. [Supply chain standards manual, 05/09/2019: d39w7f4ix9f5s9.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Assessment of scope of excessive working hours in supply chain • Met: Analysis of trends demonstrating progress: 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]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: Requirement on OECD Guidance aligned due diligence in contracts/codes with suppliers: The Supply Chain Standards indicates: 'Amazon is committed to avoiding the use of minerals that have fuelled conflict. Suppliers should support our effort to identify the origin of designated minerals used in our products consistent with recognized due diligence frameworks. In line with this due diligence, Suppliers should source from smelters and refiners that have successfully completed a recognized third-party responsible minerals audit'. The 2021 Form SD adds: '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'. However, it is not clear that the Company incorporates into commercial contracts/written agreements with suppliers' requirements to conduct due diligence in accordance with the OECD Guidance for at least 3TG. [Supply Chain Standards, 19/01/2023: sustainability.aboutamazon.com] & [2021 Conflict Minerals Report - Form SD, 2022: d18rn0p25nwr6d.cloudfront.net] • Not Met: Describes work with smelters/refiners and suppliers on due diligence <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Requirement to disclose smelter/refiner information in contracts/codes with suppliers • Not Met: Requirement on suppliers covers all minerals
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: Describes 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. [2021 Conflict Minerals Report - Form SD, 2022: d18rn0p25nwr6d.cloudfront.net] • Met: Describes process to identify smelters/refiners: The 2021 Form SD indicates that: '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'. [2021 Conflict Minerals Report - Form SD, 2022: d18rn0p25nwr6d.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Discloses smelters/refiners assessed 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. It indicates: 'Because many of the suppliers for our in-scope products that provided country of origin and facility information provided this information to us for their entire supply chain, without specifying which facilities contributed gold, tin, tungsten, or tantalum used in components of the in-scope products, we are unable to validate the accuracy of the list in Annex A, including which of these facilities in fact processed the gold, tin, tungsten, or tantalum used in the in-scope products'. [2021 Conflict Minerals Report - Form SD, 2022: d18rn0p25nwr6d.cloudfront.net] • Not Met: Risk identification and disclosure covers all minerals

Indicator Code	Indicator name	Score (out of 2)	Explanation
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 risk management system for supply chain: The 2021 Modern Slavery statement 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 refer to partnership collaboration and future plans. No further details found during last revision. [2021 Modern Slavery statement, 2022: sustainability.aboutamazon.com] • Not Met: Describes process of monitoring risk prevention/mitigation system • Not Met: Discloses improvements in risk prevention/mitigation system: The 2021 Form SD adds: 'will continue evaluating the results of their efforts in 2022 in order to mitigate the risk that minerals procured by any of our suppliers benefit armed groups in the DRC region'. However, it is not clear if there has been significant improvement in risk prevention/mitigation over time with respect to at least 3TG. [2021 Conflict Minerals Report - Form SD, 2022: d18rn0p25nwr6d.cloudfront.net] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes engagement with suppliers/stakeholders on 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
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E(1).0

Serious
allegation No 1

• 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).

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.

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.

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.

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.

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 the weaknesses of US federal labour laws to undermine workers' rights in ways they would not in Europe.

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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: 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> <p>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]</p>
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: 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]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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] Score 2 <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: See above. [The Verge, 23/12/2021: theverge.com] • Not Met: Stakeholder input to steps taken: See above. [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	The individual elements of the assessment are met or not as follows: Score 1 <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 does not set unreasonable performance goals. However, the company did not provide any evidence to substantiate these claims. 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] Score 2 <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 above. [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 • 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. 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. 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.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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 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: 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>

Indicator Code	Indicator name	Score (out of 2)	Explanation
		Score 2	<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> <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</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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": cnn.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 investigated and taken appropriate action	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> <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: cnn.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</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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: cnn.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 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: 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. [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>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 labour 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</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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] [Reuters, 19/03/2020, "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).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. <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, 19/03/2020, : reuters.com] [Politico, 20/3/2020: politico.eu] [Expansion, 17/3/2020: expansion.com] [DW.com, 22/3/2021 "Amazon workers in Italy go on strike": 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</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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, 19/03/2020,: reuters.com] [Politico, 20/3/2020: politico.eu] [Expansion, 17/3/2020: expansion.com]</p>
E(3).2	The company has investigated and taken appropriate action	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: 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 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>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: 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'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: 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 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: 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]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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.
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Area: Working Hours • Headline: Amazon delivery drivers criticized working conditions in Japan • Story: On June 13, 2022, press reported that a group of 10 people working as freelance delivery drivers for Amazon Japan unit have unionized and handed over a letter to the Company demanding that their poor working conditions be corrected. <p>According to the union, Amazon controlled their work hours by sending delivery instructions via smartphones and that outsourcing of delivery operations was a way to avoid signing labour contracts.</p> <p>In a press conference, the drivers claimed that they have been made to work excessively long hours, especially after the company switched to artificial intelligence to decide the number of packages to deliver and each driver's area of coverage. The union leader reportedly said that "The huge workload is stressful and we cannot handle it".</p> <p>Press added that the drivers were treated as sole proprietors or subcontracted workers, but they claimed their working hours and delivery destinations are managed by an application provided by Amazon. Therefore, they said, Amazon is required to hold labour talks with them.</p> <p>On September 07, 2022, another group of delivery drivers subcontracting for Amazon in Japan have unionized, claiming the Company's Artificial Intelligence (AI) software often planned routes that were impossible to complete within set deadlines. The labour union, formed by 15 drivers in Nagasaki in a protest against Amazon.</p> <p>Workers said they are tired of working long hours to deliver more and more parcels for no extra pay, and blamed the Company's software, which automatically set routes and delivery times, for exacerbating problems.</p> <p>Tatsuya Sekiguchi, the vice executive chairman of Tokyo Union, who helped manage both union efforts, said Amazon's AI software often dispatched drivers along inefficient routes that forced them to seek other paths. "The AI often doesn't account for real-world conditions like rivers or train tracks or roads that are too narrow for vehicles. The results are unreasonable demands and long hours," he said.</p> <p>Unions demanded Amazon to cut overtime work, and claimed that the delivery drivers should be treated as employees since they work directly for the Company. "Given that they get orders directly from Amazon Japan through an app, they work for Amazon", added the vice executive chairman of Tokyo Union.</p> <p>On September 12, 2022, press sources reported that Amazon workers in Japan have used a hotline to highlight the "harsh reality of workers' labour conditions" in several instances.</p> <p>A session was held by the Japan Community Union Federation (JCUF), a labour union for delivery drivers, together with the Japanese Trade Union Confederation (JTUC), lawyers familiar with labour issues, and other parties. According to the JCUF and others, many drivers worked as sole proprietors who entered into contracts with Amazon's subcontractors that outsource delivery work. As they are not employment contracts, labour law rules regarding minimum wage, regulations on working hours, and other matters are not applicable.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>According to press, there were 20 inquiries to the JCUF from nationwide areas, especially in the Kanto region around Tokyo. An individual said that following a change in delivery methods, they began to be paid a fixed amount per day, instead of based on the number of packages. They said, "Even though my pay had not been raised, the number of daily goods I deliver has doubled from around 100 to over 200."</p> <p>There were also workers who reported grave consequences of increased workloads, such as "I cannot take breaks, and do not even have time to go to the toilet" also "due to labour shortages, I was forced to do delivery work even with a high fever," and, "I am worried that I might cause an accident if things remain as they are." Another party pointed out that the app that guided their deliveries showed irrational routes.</p> <p>JCUF President said: "When looking at the content of inquiries, the workers deliver goods based on orders by Amazon's app, and it can be said that they are workers protected by the nation's labour laws. There are many cases that cannot be solved unless they are negotiated by the union." The JCUF would continue to accept inquiries through online forms and the hotline, added press.</p> <p>On October 04, 2022, press reported that three freight companies in Tokyo, subcontracted to deliver packages for Amazon, allegedly required drivers to use other people's Identity Documents (IDs) to disguise long working hours.</p> <p>To rectify matters, a labour union for Amazon delivery personnel set up a Yokosuka branch in June 2022 with the aim of improving working conditions.</p> <p>According to the union, Amazon allegedly kept track of the working hours of delivery personnel through an app that sets a cap of 60 hours in any work week. However, a worker informed the union that a freight company in Yokohama instructed delivery personnel who put in more than 60 hours per week to use another person's ID.</p> <p>Another driver, who signed a contract with a secondary subcontractor of Amazon in Kanagawa Prefecture in January 2020, said the practice of using another person's ID was "common practice". The man said that "the names of drivers, along with barcodes, are posted on the walls of the Company warehouse and that each driver used a scanner provided by the chief contractor to scan their barcode at the start of a shift".</p> <p>Press added that the IDs reportedly covered delivery personnel whose weekly working hours below 60 and those who quit or were no longer under contract. The man said delivery personnel were instructed to use fake IDs during busy times such as Amazon's Black Friday sales period.</p> <p>The worker typically worked a 13-hour day. In March 2022, he had an averaged 66-hour working week, receiving job orders from Amazon via an app. He also said the number of packages he was required to deliver each day has "risen sharply over the past year", according to press.</p> <p>In June 2022, the branch submitted a letter to Amazon and the chief contractor, as well as the two subcontractors, saying that the practice constituted "a serious compliance violation in terms of the Private Information Protection Law." It called for an immediate end to the "heinous illegal activity to conceal excess labor and long driving hours."</p> <p>[The Asahi Shimbun, 14/06/2022, "Delivery drivers form labor union, seek talks with Amazon": asahi.com] [The Register, 06/09/2022, "Amazon drivers unionize after AI sends them on 'impossible' routes": theregister.com] [The Mainichi, 12/09/2022, "No time to go to the toilet': Amazon drivers share harsh working reality via Tokyo hotline": mainichi.jp] [Asia & Japan Watch, 04/10/2022, "Amazon delivery firms tell drivers to use fake ID to mask long hours": asahi.com]</p>
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: An Amazon official was cited by local media, stating that the company has "received the letter and is scrutinizing the content of their requests." [Kyodo News, 14/06/2022, "Amazon Japan delivery drivers form union, claiming overwork": english.kyodonews.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 • Not Met: Detailed response
E(4).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engaged with stakeholders: Amazon has reportedly decline to negotiate with the union, claiming that it does not directly employ the drivers, but hires them through a subcontracting agreement with a secondary subcontractor. [Asian Labour Review, 23/11/2022, "Delivery Workers' Union Takes on Amazon Japan": labourreview.org] • Not Met: Identified cause Score 2 • Not Met: Identified and implemented improvements: Although in its 2021 Sustainability Report, Amazon explains that it "respect freedom of association and [its] employees' right to join, form, or not to join a labour union or other lawful organization of their own selection, without fear of reprisal, intimidation, or harassment.", the company does not have the same policies for its subcontracted employees. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] • Not Met: Stakeholder input to steps taken
E(4).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provided remedy • Not Met: Evidence for lack of Impact or link Score 2 • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(5).0	Serious allegation No 5		• 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. 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. 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 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. Foxconn admitted that students had been employed illegally and said it was taking immediate action to fix the situation. 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. 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. [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]
E(5).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 • 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]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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 imprisonment 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 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: 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 engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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 after pressure from Amazon. [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] • 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: Working Hours • Headline: Several drivers sued Amazon over working conditions in the UK • Story: On December 31, 2021, The Independent reported that 392 drivers who have delivered parcels for Amazon have joined a legal battle seeking compensation from the Company over employment rights. <p>Drivers who distribute goods to addresses for Amazon via “delivery service partner” firms are classed as self-employed, denying them employee rights such as the minimum wage and holiday pay, according to press sources.</p> <p>One driver involved in the legal action disclosed how he endured gruelling shifts delivering up to around 300 packages a day and faced more than a month off work without pay when he fell ill. He accused Amazon of treating drivers as “slaves”.</p> <p>Another driver explained he was “very stressed” because of the amount of parcels he had to deliver and accidentally reversed into a pole. He was hospitalised for 12 days to be treated for a health condition and ended up being unable to work for a month and a half.</p> <p>Leigh Day, the legal firm behind the legal proceeding, believed at least 3,000 drivers could be entitled to an average of GBP 10,500 (USD 14,244) in compensation for each year they have delivered parcels for the Company meaning that Amazon might have to pay out millions of pounds.</p> <p>The legal action followed a survey of drivers who had delivered parcels for Amazon over the Christmas period. The survey, conducted by Leigh Day, found nearly nine</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>out of 10 drivers claiming that targets or working conditions had put themselves or others at risk of harm.</p> <p>Adding to that, eight in 10 drivers said their job as a delivery driver had felt more pressured since the Covid-19 pandemic, while only half said the money they earned doing the role covered the cost of living. "About a third said they worked more than 12 hours a day, and 94 per cent revealed they worked without taking a break. One in five said they had worked more than six days in a row without taking a day off", press sources reported.</p> <p>In August 2021, Leigh Day submitted an employment tribunal claim on behalf of one driver, and since then over 300 drivers joined the legal action. [The Independent, 31/12/2021, "Almost 400 drivers join employment rights legal battle against Amazon": independent.co.uk]</p>
E(6).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: On 27 March 2023, media reported that an employment tribunal rejected a bid by Amazon to dismiss the lawsuit filed by its Delivery Service Partners in the United Kingdom. A spokesperson of the company responded to the reports and was cited by local media stating that they are "committed to ensuring these drivers are fairly compensated by the delivery companies they work with and are treated with respect". [Belfast Telegraph, 27/03/2023, "Judge refuses Amazon dismissal bid over delivery driver lawsuit": belfasttelegraph.co.uk] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: On 27 March 2023, an Amazon spokesperson responded to the news of the dismissal to throw out the lawsuit filed against the company, stating "[w]e're hugely proud of the drivers who work with our partners across the country, getting our customers what they want, when they want, wherever they are [...] We are committed to ensuring these drivers are fairly compensated by the delivery companies they work with and are treated with respect, and this is reflected by the positive feedback we hear from drivers every day." However, the Company did not address the alleged rights violations claimed by the drivers in lawsuit. [Belfast Telegraph, 27/03/2023: belfasttelegraph.co.uk]
E(6).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Engaged with stakeholders: In August 2021, Amazon's delivery service director released a message to its delivery partners, stating "[w]e've seen a growing number of posts around concerns over driver workload, questioning the data we use to determine what 'good' looks like, and asking to see more change [...] I have multiple facets of my team whose only jobs are to gather and analyze insights from drivers and DSPs across the network, and we look at this data consistently and frequently." She added that "unconstructive negativity and complaints add noise to the platform and detract from the experience of the partners who want to learn, connect and ensure their voices and experiences are heard." [Yahoo!news, 07/10/2021, "Amazon Delivery Partners Rage Against the Machines: 'We Were Treated Like Robots'": uk.news.yahoo.com] • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: Although in its 2021 Sustainability Report, Amazon explains that it "respect freedom of association and [its] employees' right to join, form, or not to join a labour union or other lawful organization of their own selection, without fear of reprisal, intimidation, or harassment.", the company does not have the same policies for its subcontracted employees. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] • Not Met: Stakeholder input to steps taken
E(6).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: 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: Land rights; Right to a safe, clean, healthy and sustainable environment • Headline: Amazon, Google, Microsoft and Apple accused of buying illegally extracted gold in Brazil

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Story: On 25 July 2022, media sources reported that a journalistic investigation in Brazil has revealed that Amazon, Google, Microsoft, and Apple have bought gold from several refiners, including the company Chimet, investigated by the Federal Police for being the destination of ore illegally extracted from Kayapó indigenous land, and the company Marsam, whose supplier has been accused by the Federal Prosecutor's Office of causing environmental damage due to the purchase of illegal gold. <p>Sources further reported that the illegal gold mines result in deforestation and river contamination as well as mercury poisoning. The practice has reportedly been attracting organized crime as armed attacks by native farmers have been revealed by the press in recent years.</p> <p>According to sources, the finding that the four companies were using illegal gold mined in Brazil occurred because Amazon, Google, Microsoft and Apple were required to send the U.S. Securities and Exchange Commission (SEC) a list of their suppliers, not only of gold, but also of tin, tungsten and tantalum, and it was in these documents that the deals with the Brazilian and Italian company investigated were proven.</p> <p>Press added that mining on Brazilian indigenous lands violated the country's constitution and that illegal mining was considered by environmentalists to be one of the main threats to the Brazilian Amazon forest. [Reuters, 25/07/2022, "Illegal Brazil gold tied to Italian refiner and Big Tech customers -documents": reuters.com] [Reporter Brasil, 25/07/2022, "Exclusivo: Apple, Google, Microsoft e Amazon usaram ouro ilegal de terras indígenas brasileiras": reporterbrasil.org.br]</p>
E(7).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(7).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 • Not Met: Identified cause <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: In Its 2021 Sustainability Report, Amazon states "In 2022, we will implement additional smelter due diligence protocols as we work toward 100% of tin, tungsten, tantalum, and gold mineral smelters and refiners in our supply chain being certified using a recognized minerals assurance program." However, this statement was made before the allegations were published and can therefore not be considered to be made as a reaction to it. [2021 Sustainability report, 2022: sustainability.aboutamazon.com] • Not Met: Stakeholder input to steps taken
E(7).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 • 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(8).0	Serious allegation No 8		<ul style="list-style-type: none"> • Area: Forced labour <p>• Headline: Amazon among companies accused of using suppliers linked to forced labour in China</p> <p>• 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</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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> <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> <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. [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 labour. 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." [Business and Human Rights Resource Centre, 02/10/2020: 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>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 Uighur labour. In addition,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Amazon did not 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> <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 12/03/21, (OTH 55/2021): spcommreports.ohchr.org]</p>
E(8).2	The company has investigated and taken appropriate action	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 • 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". 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>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 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 • 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]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<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 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 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: 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: 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, "After deadly warehouse collapse, amazon workers say they receive virtually no emergency training": The Intercept, 13/12/2021, "After deadly warehouse collapse, amazon workers say they receive virtually no emergency training"]
E(9).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: 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

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