

Duty of Vigilance Plan 2021

Amazon France Logistique S.A.S.



This Duty of Vigilance Plan, published in June 2022, was prepared in accordance with the requirements of the French Corporate Duty of Vigilance Law (Law No. 2017-399 of 27 March 2017, French Commercial Code, Art. L. 225-102-4) for the calendar year 2021.



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1. Introduction

1.1 About This Plan

Amazon France Logistique S.A.S. (AFL) is a subsidiary of Amazon.com, Inc. (Amazon). This Duty of Vigilance Plan for AFL was prepared in accordance with the requirements of the French Corporate Duty of Vigilance Law (Law No. 2017-399 of 27 March 2017, French Commercial Code, Art. L. 225-102-4) for the 2021 calendar year. AFL has no affiliated entities under the scope of the Duty of Vigilance Law. In addition, information is included on AFL's response to the novel coronavirus (COVID-19) pandemic.

Consistent with the Duty of Vigilance Law, this plan considers input from internal and external AFL stakeholders and provides information about human rights, health and safety, and environmental matters related to AFL's operations and relevant operations of its subcontractors or suppliers. It includes information on risk mapping and assessment, reporting and follow-up, and actions AFL is taking to prevent and mitigate these matters to maintain safe, respectful, and inclusive workplaces.

1.2 Public Commitment to Respect Human Rights

Amazon and AFL are committed to respecting human rights and operating in compliance with all applicable laws and regulations, including the French Corporate Duty of Vigilance Law.

AFL is committed to upholding Amazon's global policies and **Supply Chain Standards** referenced in this section and to ensuring the people and communities that support its entire value chain are treated with fundamental dignity and respect. Amazon strives to ensure the products and services it provides are produced in a way that respects internationally recognized human rights. Amazon's policies and Supply Chain Standards are informed by international standards; Amazon respects and supports the United Nations (UN) Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights, the Core Conventions of the International Labour Organization (ILO), and the ILO Declaration on Fundamental Principles

and Rights at Work. Amazon has codified its commitment to human rights in **Amazon's Global Human Rights Principles**, which underline the importance it places on embedding respect for human rights throughout its business. Amazon regularly reviews its **Supply Chain Standards** against policies developed by industry associations. In addition, in late 2021, Amazon signed the UN Women's Empowerment Principles, further strengthening its commitment to promote gender equity and empowerment in the workplace and communities.

Amazon's **Code of Business Conduct and Ethics** requires that, in performing their job duties, all Amazon employees, including those of AFL, always act lawfully, ethically, and in the best interests of Amazon. Employees, including AFL employees, may raise questions or report suspected violations of its Code of Business Conduct and Ethics through Amazon's Ethics Line.

1.3 Engagement with Stakeholders

AFL is committed to strengthening its efforts to engage and improve dialogue with stakeholders. Engagement with internal and external stakeholders is important to AFL's work to continuously evaluate its operations and value chain. AFL engages with experts and potentially impacted individuals to inform its efforts to mitigate human rights and other risks and ensure the effectiveness of such efforts. For this Vigilance Plan, AFL worked with an external sustainability and human rights consultancy and incorporated feedback from a diverse group of internal and external stakeholders across AFL's operations and the operations of partners with whom AFL has established commercial relationships. This group included AFL associates, contract workers, female employees, general managers, transportation operations management, and civil society.

AFL engages in direct communications with employees to continuously monitor relevant human rights, health and safety, and environmental risks and prioritize key areas where AFL has the greatest opportunity to have a positive impact on workers and communities (see Section 5).



As stated in Amazon's Global Human Rights Principles, Amazon respects 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. All employees of AFL are covered by the national collective bargaining agreements (CBAs) of the Transportation and Logistics Sector. Employees have representation as part of a central works council and local works councils that include health and safety commissions (called *Comité Social et Economique*). Works councils are present at all AFL Fulfillment Centers, and employee representatives are important stakeholders in helping to identify and assess issues related to working conditions. AFL has ongoing dialogue with employee representatives and trade union representatives, which enables AFL to have discussions with them on topics related to employees' concerns and improve working conditions through negotiations on both mandatory and optional topics.

In 2021, AFL negotiated four collective bargaining agreements with the union representatives for its sites. Two were signed in May and June 2021 addressing AFL's policies on wages and working time and its remote work policies for managers, and a third addressing AFL's workplace life-quality (*Qualité de Vie au Travail*) and professional equality was signed in July 2021 and approved by a referendum of employees (95% of voters in favor) in September 2021 (QVT agreement). AFL also conducted a negotiation on job management, career path, and vocational training, encouraging both external (through financial incentives) and internal training opportunities which led to a minority agreement.

In addition, AFL is committed to strengthening communities where its employees live and work. In 2021, AFL supported more than 100 local charities meeting the needs of underrepresented people living around its sites, ranging from hunger and homelessness to health and education.

1.4 About Amazon France Logistique S.A.S.

Supported by innovative world-class technologies, Amazon's global network of Fulfillment Centers, Sortation Centers, and Delivery Stations are responsible for serving Amazon customers and supporting third-party small businesses that use services like Fulfillment by Amazon to deliver to their customers. AFL provides logistics services relating to storage, collection, packing, and processing of orders for the benefit of other Amazon entities. At AFL Fulfillment Centers, inventory comes in from manufacturers, vendors, and selling partners and is shipped out directly to customers. Other Amazon entities or third parties perform subsequent sortation and transportation to customers. AFL operates eight Fulfillment Centers in France.

During 2021, the number of AFL's permanent employees increased by 3,900 to a total of 11,750. In addition, to support permanent employees AFL also hires temporary workers during high-activity seasons.

AFL's Fulfillment Centers are large logistics centers with modern facilities, rigorous safety policies and practices, and highly automated processes of selection, packaging, and arrangement for shipping. They run multiple shifts per day, and employees perform several different roles, from leading teams to boxing up orders and shipping directly to customers. In 2021 women made up 44.6% of AFL's workforce. Further, in 2021 AFL received a score of 99/100 on the gender equality index designed by the French Ministry of Employment (compared to a score of 94/100 in 2020). AFL's improved score reflects its continuing commitment to increase women's representation at all levels. In addition, AFL is committed to ensuring that all employees have attractive wages and social benefits, a positive work environment, and opportunities for career development through training programs, mentoring, and the payment of tuition fees for training recognized by the French government. All AFL employees have access to innovative tools as well as promotion and internal mobility mechanisms. For example, at AFL's Fulfillment Centers, the Career Choice program offers to pre-pay up to 95% of tuition fees related to training programs for up to four years, and the Amazon School program allows associates



to leverage their experience in logistics to earn a degree certified by the government.

For the third consecutive year, in January 2022 Amazon was certified as “Top Employer” by the Top Employer Institute in France. The Top Employer certification distinguishes employers who create optimal conditions for the development of their employees. AFL employs a diverse group of associates with all types of personal and professional backgrounds and also offers opportunities for individuals without prior experience in logistics and without a prerequisite diploma. AFL works in partnership with national and local employment entities—*Pôle Emploi*, local missions, *Cap Emploi*, and urban communities—to place job seekers with non-traditional employment backgrounds in jobs and foster the inclusion of young adults through employment. AFL signed a new agreement with *Pôle Emploi* in support of the campaign “All Mobilized for Employment,” by which it reiterates its commitment to diversity and equal opportunity in recruiting, with a special support for young people from priority city districts.

1.5 Governance Structure for Human Rights, Health and Safety, and the Environment

Amazon’s Board of Directors appoints committees for oversight on specific issues. The Nominating and Corporate Governance Committee oversees Amazon’s global environmental, corporate social responsibility (including as this relates to its operations and supply chain), and corporate governance policies and initiatives. The Committee also oversees and monitors Amazon’s policies and initiatives relating to human rights and ethical business practices. The Leadership Development and Compensation Committee oversees Amazon’s global human capital management strategies and policies. The full Board regularly reviews reports from management on related risks and strategies for addressing them. Members of Amazon’s executive leadership formally approve Amazon policies, including those policies listed above. Amazon’s global corporate teams based in Europe and North America are responsible for the day-to-day management of global policies and procedures governing human rights, health and safety, and environmental risks within AFL operations alongside teams in France to manage

and implement standards in line with national and regional requirements. This Plan was drafted with the input and engagement of the aforementioned global corporate teams, and the policies, procedures, and programs implemented by these teams are detailed in the sections that follow.

In 2022, AFL commits to continue monitoring and assessing the efficacy of the measures implemented pursuant to this Vigilance Plan and to assess whether AFL’s compliance and other functions are appropriately resourced.



2. Mapping of Risks

2.1 Methodology

AFL, with support from a third-party sustainability and human rights consultancy, identified and assessed potential risks associated with AFL's operations based on the three pillars of the French Corporate Duty of Vigilance Law and on the core international labor and human rights instruments, including the UN Guiding Principles on Business and Human Rights (UNGPs), the UN Universal Declaration of Human Rights, the Core Conventions of the ILO, and the ILO Declaration on Fundamental Principles and Rights at Work, as well as the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

To identify salient risks, current and potential adverse impacts within AFL's operations were assessed based on the following criteria, as outlined by the UNGPs: the scale, scope, and remediable character of impacts, in addition to their likelihood.

In conducting the assessment, feedback from a diverse group of internal and external stakeholders was considered. The assessment focused on potential impacts to individuals across AFL's operations (directly employed and indirect contract workers, community members, and customers in areas where AFL Fulfillment Centers are located) and the operations of partners with whom AFL has established commercial

relationships (warehousing; ancillary services such as maintenance, cleaning, and catering; transport and logistics; and packaging). The risk assessment included a review of reports by international and local organizations, civil society organizations, and trade unions; a review of AFL's policies and procedures; and a series of interviews with representatives of key functions across relevant corporate and in-region teams within AFL's direct and indirect operations. The key functions included: workplace health and safety, employee relations, human resources, sustainability, environment, legal, and management. In addition, the assessment included two site visits to AFL Fulfillment Centers. These site visits included interviews with a cross section of AFL managers, associates, and contractor workers, including female employees, individuals from underrepresented communities, and migrant workers. Consultancy experts also interviewed an external stakeholder from a French civil society organization.

2.2 Identification and Prioritization of Risks

The risk assessment focused on the areas in the table below.

As a result of the AFL mapping exercise, the priority risks identified in 2021 were workplace discrimination, occupational injury and workplace stress, and solid waste management.

Human Rights	Health and Safety	The Environment
Wages and Benefits	Occupational Injury and Workplace Stress	Solid Waste Management
Hours and Overtime	Health Impacts of COVID-19	Energy Consumption and Climate Change Impacts
Workplace Discrimination		Impacts on Biodiversity
Trade Union Rights		
Migrant Worker Rights		
Access to Grievance Mechanisms		



3. Due Diligence Processes in Place

This Vigilance Plan addresses AFL's measures and actions to mitigate risks and prevent serious harm to human rights, health and safety, and the environment that may result from AFL's activities or the activities of subcontractors and suppliers with which AFL has an established commercial relationship.

3.1 Hours and Overtime

AFL working conditions are governed by the Transportation and Logistics Sector CBAs. AFL employees are assigned work in seven-hour shifts and regular rest breaks and rest days are built into each employee's schedule. Employees in full-time positions work 35 hours per week on annual average, and may be requested to conduct up to 13 additional hours of overtime per week. AFL provides additional compensation for night shifts that exceeds requirements outlined in the Transportation and Logistics Sector CBAs. Human Resources and managers are notified if an employee reaches the maximum work hours in order to make shift adjustments. Site-level management and HR grievance and communication channels are available for employees to raise and resolve concerns about their assigned shift, hours, or need for time off (see Section 5).

AFL has policies and workplace agreements to actively manage risk related to working hours and overtime, and AFL implemented additional measures in 2021 to address and mitigate such risk. For example, AFL recently negotiated the QVT agreement on workplace life-quality and implemented new policies mainly related to work-life balance, notably for parents. Such measures include, among others, the reduction of working hours starting the fifth month of pregnancy, the option for employees to donate days off to each other, and additional paid leave for parents of children with disabilities. In addition, AFL promotes leave for parents on their children's first day of school and allows greater flexibility for managers who can now work remotely up to three days per week. AFL also implemented a two-month paid

paternal leave, and employees who are caregivers can benefit from four months of paid leave.

Further measures adopted in 2021 include clarifying that requests for associates to work on Sundays during peak season were optional. In addition, AFL also renewed the policy for staff to take unpaid leave for up to three days per year without justification.

In 2022, AFL will implement measures to raise visibility and understanding of updated policies on workplace-life quality and the importance of well-being. AFL will also engage with worker representatives about continuing to improve policies and monitoring processes to track the resolution of worker concerns regarding hours and overtime. AFL will take additional measures to improve the accessibility of Fulfillment Centers to optimize the time associates spend at and away from work. For example, AFL will engage with local public transportation companies on optimizing timetables for shifts. In addition, AFL will continue to review processes to facilitate movement around sites and engage with worker representatives on potential measures to improve worker time at and away from work.

3.2 Wages and Benefits

AFL is committed to ensuring that all employees have attractive wages and social benefits. AFL offers a health insurance plan to all its employees (up to 70% covered by the employer), and AFL associates are paid more than the French minimum wage upon hiring. They also rapidly gain access to a range of benefits including a 13th month salary, opportunities to own Amazon stock, and transport allowance. AFL working conditions and compensation are governed by the Transportation and Logistics Sector CBAs, with compensation for night shifts exceeding the legal requirements. AFL teams review wages and benefits each year to guarantee competitive compensation for employees. In the 2021 annual negotiation on a wages agreement, AFL offered a 2% general pay increase to logistics associates and a €150 final



quarter attendance bonus, and implemented a system of payments to support associates faced with long-term illness (so-called *système de prévoyance*). In the event of parental leave, AFL maintains the employer's contribution to employees' health insurance. In November 2021, AFL announced it would double the amount of the Country Inflation Allowance and offered a total allowance of €200 net to all eligible associates, paid in December 2021, to support associates' purchase power against inflation.

In 2022, AFL will continue to engage worker representatives on annual wages and benefits, including as part of the *négociation annuelle obligatoire* (or NAO).

3.3 Workplace Discrimination

Amazon's Global Human Rights Principles make clear its policy on equal opportunity. Amazon is committed to ensuring that all workers are treated equally, and it does not tolerate discrimination based on race, color, national origin, gender, gender identity, sexual orientation, religion, creed, the presence of any physical, sensory, or mental disabilities, age, political ideology, pregnancy, citizenship, migrant status, veteran status, ethnicity, ancestry, caste, marital or family status, or other legally protected status in hiring and working practices, such as job applications, promotions, job assignments, training, wages, benefits, and termination. Amazon's aim is to ensure employment decisions and actions are based only on business-related considerations—focused solely on an individual's ability to perform the work, not their personal characteristics. As outlined in the Code of Business Conduct and Ethics, Amazon does not tolerate discrimination, violent and threatening behavior, or harassment against any individual, including AFL employees, contract workers, and business partners. Any associate who believes they have been discriminated against or suffered from harassment or retaliation for reporting discrimination or harassment should report it to their manager, any member of management, Human Resources, or the Ethics Line, which is operated by an independent third party and available in 165 languages. Upon receipt of the complaint, Amazon will conduct a prompt investigation and take appropriate effective

corrective action, as may be warranted. Amazon will not tolerate or permit any associate to suffer retaliation of any kind or to suffer any adverse employment action as a result of reporting an unlawful discrimination or harassment claim.

AFL continues to diversify its workforce and strengthen its culture of inclusion in line with Amazon's commitment to diversity, equity, and inclusion. Amazon believes that quality jobs for women translate to positive impacts for communities, and also tracks the representation of women (and underrepresented communities), because diversity helps build better teams that obsess over and better represent Amazon's global customer base. In 2021, women represented 44.6% of the total amount of AFL employees, and AFL's score on the French government's gender equality index rose from 94 to 99/100.

A series of anti-discrimination measures were included in the workplace life-quality QVT agreement. Examples of these measures include equal access to professional development and training programs for employees returning to work after parental leave and measures to ensure equity in recruitment, such as issuing gender-neutral job offers and raising awareness of employees in charge of recruitment on these matters. Additionally, AFL offers a €500 grant to families after childbirth and has established breastfeeding rooms in each Fulfillment Center.

Regarding inclusion of persons with disabilities within the workforce, each site works to enhance their professional inclusion, whether through programs for existing employees with disabilities or in the recruitment of permanent and temporary workers with disabilities. AFL also has a partnership agreement with the *Association des Paralysés de France*; 200 of its employees currently work on AFL sites through specific contracts encouraged by the government (*CDD Tremplin*). AFL sites also support local associations and entities to promote diversity and inclusion in other ways. For example, sites that receive government funds for recruiting and hiring employees under 26 years of age or from underserved neighborhoods regularly pass incentives on to the local associations and entities.

Amazon has 13 employee-led affinity groups comprised of more than 100,000 employees in



hundreds of chapters globally who passionately and positively impact the company. Each affinity group has executive sponsors who support them in engaging at every level of the company. Groups include Amazon People with Disabilities; Amazon Women in Engineering; Asians@Amazon; Black Employee Network; Body Positive Peers; Families@Amazon; Glamazon (for LGBTQIA+ employees and allies); Indigenous@Amazon; Latinos@Amazon; Mental Health and Well-Being; Warriors@Amazon; Women@Amazon; and Women in Finance Initiative. Amazon engages and consults their leaders and seek their ideas to improve inclusion efforts internally and externally.

Consistent with Amazon's ongoing commitment to diversity, equity, and inclusion, AFL recognizes more needs to be done. For example, women were underrepresented among cadres (employees at and above Level 4) in 2021, with 356 female cadres compared to 491 male cadres. Additionally, while some AFL sites have hired more than 6% of people with disabilities, other Fulfillment Centers remain below the legal inclusion quota of 6% of the total workforce, and AFL's total of 4.4% fell below the quota for 2021.

In 2022, AFL will continue to develop measures aimed at closing the gender gap among cadres, and will ensure each site below the 6% ratio for inclusion of persons with disabilities sets a goal to meet or exceed that ratio, including through recruitment and by partnering with workplace inclusion companies. In addition, to increase awareness among workers about how to raise concerns related to workplace discrimination, AFL will implement measures to raise visibility and understanding of the Ethics Line at Fulfillment Centers.

3.4 Occupational Injury and Workplace Stress

Safety is integral to everything Amazon does—every day, in every operation, across every country. In France, AFL has strong and detailed Workplace Health & Safety standards and a proactive health and safety plan in place to assess, prevent, and remediate risks related to occupational injury and workplace stress. AFL's health and safety principles and systems apply to all employees, including temporary employees. Leaders in AFL facilities set the example for the highest safety standards. From coaching and ergonomic training

to ensuring processes and equipment in work areas are safely operated, leaders proactively verify that safety protocols are followed. Independent safety teams at each facility are in charge of incident investigations, metrics, and audits. The management structure of the teams includes engineer specialists who deep dive issues, manage health and safety metrics, and support managers on safety issues related to their daily routines, as well as nurses, who on top of their specific duties are in charge of safety inspections and ergonomic assessments.

In 2021, AFL continued to concentrate on site-level ergonomics, identifying and implementing solutions at sites to reduce any risk of musculoskeletal disorder (MSD). For example, this included improvements to equip AFL sites with adjustable height tables at employee work stations to relieve operators' efforts and a 2021 ergonomic analysis coupled with specific budget allocation to improve workstations for employees with disabilities. AFL also signed the workplace life-quality QVT agreement, which covers the prevention of ergonomic risks and the development of a workstation ergonomics plan. AFL also focused on preventing the risk of serious injury. At all sites AFL continued a campaign to prevent stair incident injuries and a safety enhancement program to avoid interaction between pedestrians and Powered Industrial Trucks by using physical barriers to ensure segregation of the working areas or following EU guidelines if complete segregation is not possible. The industry-leading safety technology AFL uses every day is designed to protect and promote employees' health, and AFL consistently tests and refines processes to improve working conditions in its facilities.

Related to workplace stress, AFL focused on mitigating psychosocial risks by taking steps to improve workers' feelings of well-being and safety in the workplace. AFL sought feedback from employees about conditions in the workplace and the speed and effectiveness of management responses to safety issues. AFL also set up an external social worker service present at least one day per week at all eight sites to provide personalized assistance to and help preserve the psychological health of employees in the areas of



health, family, or economic issues. This assistance is free for the employee and all exchanges are confidential.

Below is a list of additional Amazon innovations and technologies used to support employees, solicit their feedback, and make their workplaces safer:

- The Safety Leadership Index program routinely surveys employees. Employees are asked a series of questions each month, and those answers are used to measure employees' perception of safety at each facility. An example of the kinds of questions asked is, "Does your manager care about the safety of you and your team?" Responses are used to quickly spot potential problems and remediate them.
- Safety Saves increases employee involvement by identifying hazards and fixing them before a near miss occurs or someone is injured. Employees log the hazard, while other employees are made aware in real time.
- Safety Campus is an augmented reality training program delivered to all new employees as part of their onboarding that enables them to do "hazard hunts" in a virtual Fulfillment Center so they can learn the hazards that may exist.
- The Robotic Tech Vest is worn by employees at AFL's Amazon Robotics facility and allows robotic drive units to detect employees and plan alternative travel paths to avoid interactions.
- The Independent Safety Teams' Monthly Review process gathers safety leadership across AFL to review metrics, benchmark sites, share information about good practices, and hold site manager teams accountable for follow-up.

Looking ahead, some occupational injury and workplace stress risks, such as ergonomics and noise exposure, are prioritized for continuous improvement through strong management systems.

To continue to address these, in 2022, AFL will institute robust monitoring processes to track medical check-ups for associates, monitor noise exposure, and ensure corrective actions address the negative impacts of any incident and are tracked to closure. AFL will also use the 2021 ergonomic analysis to develop prototype carts and workstations for MSD prevention and will expand

their deployment on sites, consistent with feedback received from social partners. AFL also commits to continue engaging in social dialogue with employee representatives to enhance prevention and mitigation measures in place for occupational injury and workplace stress at Fulfillment Centers.

3.5 Solid Waste Management

Amazon is committed to building a sustainable business for its customers and the planet. In 2019, Amazon co-founded The Climate Pledge—a commitment to be net zero carbon across Amazon's business by 2040, 10 years ahead of the Paris Agreement. As part of this pledge, Amazon has made ambitious commitments toward reaching this goal, including launching The Climate Pledge Fund to support the development of sustainable and decarbonizing technologies and services that will enable Amazon and other companies to meet the goals set by The Climate Pledge. This dedicated investment program—with an initial \$2 billion in funding—will invest in visionary companies whose products and solutions will facilitate the transition to a low carbon economy. As of December 2021, the fund had invested in 13 companies, most recently businesses building electric vehicle charging technology, a company that has technology to make custom-sized boxes that eliminate the need for single-use plastic, and a business that makes ultra-low carbon electro fuels. As part of Amazon's broad plan to address environmental risks, Amazon is also redesigning packaging to reduce waste.

AFL's plan to reinvent and simplify its sustainable packaging options uses a science-based approach that combines lab testing, machine learning, materials science, and manufacturing partnerships to scale sustainable change across the packaging supply chain and address risk of solid waste. Amazon's sustainable packaging initiatives reduce waste and make it easier for customers to remove products from packaging. Frustration-Free Packaging (FFP) Programs encourage manufacturers to package their products in easy-to-open packaging that is 100% recyclable and ready to ship to customers without additional Amazon boxes. To certify products under Amazon's FFP Programs, Amazon helps manufacturers innovate and improve their packaging functionality.



By testing products in a dedicated, state-of-the-art lab in Seattle and in its Fulfillment Centers across the globe, Amazon identifies specific steps that manufacturers can take to improve their packaging and ensure products are protected all the way to the customer's doorstep. As of June 2021, Amazon reduced the weight of outbound packaging by over 36% and eliminated more than 1 million tons of packaging material since 2015—the equivalent of 2 billion shipping boxes. Amazon also increased its use of flexible paper-based mailers across Europe, significantly reducing the use of plastic in packaging materials in 2021.

Amazon.fr Second Chance reduces waste at AFL facilities generated by returns by providing information to customers on how to repair Amazon devices and products. Amazon maintains a webpage on its French-language site to support customer recycling of items such as electronics and devices, batteries, and packaging, ensuring Amazon customers have the best and latest information on how to recycle in France. In August 2021, AFL announced the Fulfillment by Amazon (FBA) Grade and Resell program, which allows merchants to resell returned products at lower prices by stamping them “used.”

Also, AFL conducts an Environmental Program Assessment at new sites to reduce overall environmental risk prior to launch and has initiated a similar initiative for existing sites in 2022 to ensure long-term success. Many of the crosscutting sustainability issues Amazon prioritizes are enhanced through partnerships and collaborative initiatives with credible, knowledgeable, and innovative industry partners. AFL partners with a growing number of national and local charities to scale product donations through FBA Donations. FBA Donations automates the process for selling partners using FBA to donate their overstocked or returned items. In 2021, AFL donated more than 850,000 items to charities including *Secours Populaire Français* and *Croix-Rouge Française*. In addition:

- AFL drafts and implements Waste Procedures for the safe and compliant management of waste in accordance with sites' operational permits (*Arrêtés Prefectoraux*).

- Global Environmental Procedures are available to develop and execute environmental programs at the local level.
- AFL implements trainings on Waste Management as well as on the use of Waste Tracker, an internal tool to record and monitor hazardous waste generation and shipments.
- AFL encourages more ecological means of transport via a “sustainable mobility” flat rate that compensates employees who use less or non-polluting modes of transport for home-to-work journeys.
- Two AFL Fulfillment Centers in France were built on former military bases to reduce impacts on neighboring communities.

More information about Amazon's plan to build a sustainable business can be found on its [Sustainability](#) site.

Even with Amazon's commitment to sustainability, environmental risks remain. For example, while all AFL Fulfillment Centers have eliminated the use of plastic materials and transitioned to full paper packaging, some generate packing and plastic waste that is not recycled or recyclable, including due to how they receive some goods or the fact that some materials are not recyclable through available community recycling programs.

In 2022, AFL commits to increase recycling and sortation channels to reach at least 85% recycled waste on each site, by implementing consistent policies across all AFL Fulfillment Centers regarding waste management, including sorting, collection, and waste treatment channels.



4. Assessment of Suppliers and Service Providers

AFL engages suppliers who provide products to support its operations, such as equipment, packaging, labels, supplies, and consumables, and services that include construction, security, temporary labor, janitorial, professional, and utilities.

Amazon is committed to ensuring that its products and services are provided in a way that respects human rights and the environment. Amazon's standard purchase and service agreements for Amazon's suppliers and service providers mandate compliance with Amazon's Supply Chain Standards. Amazon's global teams work closely with suppliers to communicate the Supply Chain Standards and help suppliers build their capacity to provide working environments that are safe and respectful of human rights and the environment. In order to ensure these standards are cascaded throughout the supply chain, AFL expects suppliers to hold their subcontractors and labor agents to the standards and practices covered by Amazon's Supply Chain Standards. Where noncompliance with these standards is identified, AFL requires suppliers and service providers to implement plans to address issues and make improvements.

Amazon uses a risk-based approach to assess suppliers and service providers and monitor for continued compliance and improvement across Amazon's global supply chain. Amazon partners with a third-party global sustainability rating company, EcoVadis, to conduct risk mapping and supplier performance self-assessments on environment, labor and human rights, ethics, and sustainable procurement topics. Assessments are conducted across first-tier suppliers of non-merchandise goods and services for Amazon's EU operations, including Fulfillment Centers operated by AFL. While all AFL suppliers are based in Europe and rated low for country risk, risk mapping identified suppliers of construction services, waste collection and recycling services, adhesives, and packaging as among those with the highest sector-level social and environmental risks. AFL suppliers and service providers identified as high risk and/or strategic are requested to complete an EcoVadis self-assessment

of their sustainability management systems. Where suppliers and service providers fail to complete an assessment or demonstrate consistently low performance, Amazon procurement teams deprioritize or disengage them. Amazon seeks to prioritize high performing and compliant suppliers during tenders and once they are included in the supplier base. AFL suppliers completed 227 EcoVadis self-assessments in 2021, of which 207 obtained high or medium scores; 25 of those high-risk AFL suppliers that completed self-assessments were selected for on-site audits during 2021.



5. Alert or Grievance Mechanisms

As part of AFL's work to continuously evaluate its operations and value chain to identify, assess, and address human rights, health and safety, and environmental risks, AFL engages in direct communications with employees to continuously monitor feedback and prioritize key areas where AFL has the greatest opportunity to have a positive impact on workers and communities. This includes understanding AFL employees' concerns through dialogue directly with Human Resources teams, as well as ongoing dialogue with trade union representatives and via anonymous workplace feedback surveys.

Amazon's Legal Business Conduct and Ethics Team monitors issues raised by Amazon employees and contract workers, including those with AFL, through the Amazon Ethics Line and reports any allegations of violations of the Code of Business Conduct and Ethics to Amazon's Audit Committee. Full-time, part-time, and temporary employees alike may raise questions or report suspected violations of the Code of Business Conduct and Ethics through Amazon's Ethics Line. Amazon's Ethics Line allows for alerts by phone or web submission and is managed by an independent third party, and reports may be made anonymously.

To ensure ongoing awareness among workers about the Ethics Line, AFL will continue implementing measures to raise visibility and understanding of the Ethics Line, and also engage with worker representatives and unions about the different grievance channels available to improve their effectiveness.

Consistent, honest, and open communication with AFL employees allows individuals to raise concerns and have them directly addressed by leadership; it allows AFL to continuously improve its workplace and employee experience. AFL General Managers are committed to addressing grievances and making themselves available on site to associates. Here are some of the many additional ways AFL engages with its employees:

- **Open Door Philosophy.** Amazon believes candid and constructive communication in an environment of mutual respect is essential to AFL's collective success. AFL has an "open door" policy, which means that it welcomes and encourages any employee to discuss suggestions, concerns, or feedback with their manager, a Human Resources team member, or any member of the leadership team.
- **Connections** is a real-time, company-wide employee feedback mechanism designed to listen to and learn from employees at scale to improve the employee experience. Each day Connections questions are delivered to every Amazon employee on a computer, a workstation device, or a hand scanner. Employees may choose to answer or not answer any question, and individual responses are aggregated and shared with managers at the team level to maintain confidentiality. Connections analyzes response data and provides insights to managers and leaders to review and take actions as they uncover issues or see opportunities to improve. Topics of Connections questions at AFL during 2021 included safety improvements, workplace inclusion, and COVID-19. Through October 2021, AFL employees continued to receive four COVID-19-related questions per week with the goal of identifying opportunities for improving safety protocols. In addition, Connections deploys the Safety Leadership Index at AFL, in which response data is reviewed on a monthly basis, and, where scores are low, managers are asked to respond in a timely manner by presenting an action plan to address the issue.
- **Voice of the Associate Boards** are in Amazon Fulfillment Centers around the globe—physically and virtually—providing employees a forum for expressing their thoughts, concerns, and questions on a daily basis to leadership, with the ability to post anonymously if associates choose. Leadership teams reply directly to questions, promoting dialogue and efficient remediation of issues.



- **Regular In-Person Meetings.** Through all-hands meetings with General Managers, stand-up meetings with direct supervisors, and regular roundtables with senior leadership, AFL employees have daily opportunities to engage with leaders, raise issues, and make suggestions to continually improve the workplace.
- At AFL's Fulfillment Centers, these mechanisms, including VOA boards, roundtables, and other mechanisms, collectively have surfaced and addressed a range of workplace issues in 2021, including issues related to facilities and common services, COVID-19, engagement, working time, and safety.

6. Addressing Health Impacts of COVID-19

In facing the COVID-19 pandemic, Amazon's top concern is ensuring the health and safety of its employees. Amazon has invested more than \$1.2 billion globally in measures like temperature checks, masks, gloves, enhanced cleaning and sanitization, on-site vaccination events, extended pay and benefits options, on-site testing, and more. At the beginning of the pandemic, AFL assessed the health risks linked to COVID-19 in its fulfillment operations and reviewed all processes in order to implement precautions. These included the implementation of more than 150 new processes, such as physical distancing measures, the provision and mandated use of personal protective equipment, temperature screening at each site entry by thermal camera, dissemination of information, trainings, and surveys requesting AFL employees to provide their anonymous input on COVID-19 measures, such as the ability to maintain physical distancing and observations on the proper use of personal protective equipment. Specific teams (Safety Angels) supported monitoring and enforcement of social distancing and the proper wearing of masks. With the exception of temperature screening, these precautions continued throughout all of 2021.

AFL continued to provide extra time to employees during breaks to allow for COVID-19 sanitary measures to be properly respected. AFL followed the French government's COVID-19-related safety regulations that apply to AFL Fulfillment Centers, including those regulations related to the provision of information and consultation with employee representative bodies. AFL also negotiated with Fulfillment Center unions and extended an in-house agreement related to preventative measures in place. Under this agreement and through September 2021, AFL invited works councils to weekly site tours of office spaces and facilities to solicit feedback on the implementation of safety measures and compliance. In addition, AFL made available onsite vaccination at all facilities during all shifts; offered paid leave (four hours per dose) for workers who opted to get vaccinated elsewhere and for any absence related to COVID-19.

AFL also encouraged work-from-home for any jobs that allowed it, and executed internal audits and management checks of COVID-19 measures at each site on a weekly cadence for the first six months of 2021 and monthly thereafter.

In 2022, AFL will distribute COVID-19 self-tests to workers, as the need continues, and will also adjust Amazon's COVID-19 measures to adapt to evolving government guidelines while maintaining associate health as a priority. For example, AFL will roll back social distancing and masking requirements, where permitted in accordance with government guidance.

Daily updates highlighting Amazon's efforts to combat COVID-19 can be found on its [website](#).

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