

Human Rights Impact Assessment: 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. The raw and recovered materials supply chain is a complex system of sellers, buyers, traders, producers, processors, and manufacturers across multiple tiers and sourcing regions around the world. 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.

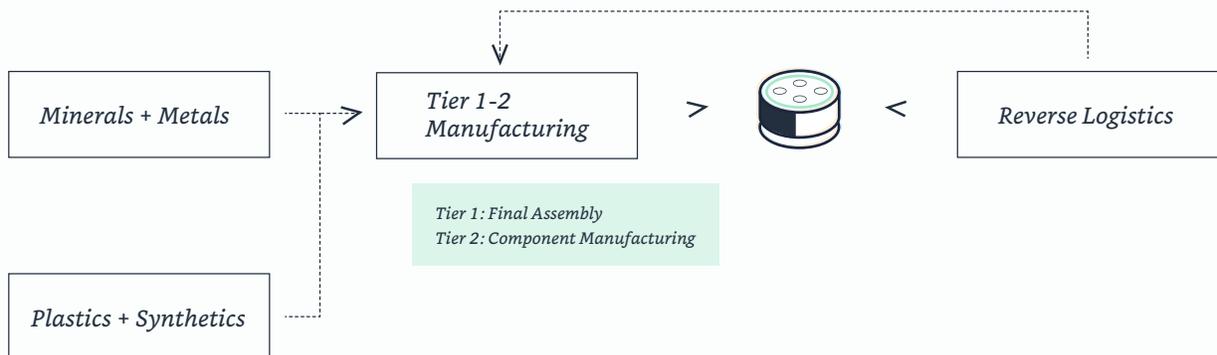
Key Learnings and Opportunities

Using the [UN Guiding Principles on Business and Human Rights](#) as a framework to guide the assessment, the HRIA conducted this past year resulted in the following findings and areas of opportunity for the supply chains of Amazon-branded digital devices, which was the focus of this HRIA. These findings and areas of opportunity could also be applied across Amazon:

Tier 1 and 2 Manufacturing: These are the facilities and suppliers involved in the final assembly of Amazon devices (Tier 1) and component manufacturing (Tier 2). The assessment found that Amazon suppliers in this category had moderate to high levels of awareness of Amazon’s social compliance requirements. However, challenges remain throughout the electronics industry as a whole, including: difficulties enforcing working hour and rest requirements; low or unequal wages, even when compliant with national minimum wages standards; and absence of effective grievance mechanisms for workers.

Raw and Recovered Materials Supply Chain

This map is a simplified visual of supply chain categories assessed for this report.



Reverse Logistics: Reverse logistics encompasses what a company does with returned products and how a returned product re-enters the supply chain. The assessment found risks in this sector were similar to those identified for Tier 1 and 2 Manufacturing.

Minerals and Metals: Amazon conducts robust due diligence on our suppliers annually to ensure the absence of conflict minerals (tin, tantalum, tungsten, and gold) in our supply chain. Human rights issues are also associated with other minerals, metals, and rare earth supply chains. Read more about our approach to conflict minerals on page 89 of our Sustainability Report.

Plastics and Synthetics: The electronics industry as a whole has limited visibility over the sourcing locations of the plastics and synthetics supply chain or the chemicals used in plastic production. These commodities are sold to countless purchasers across multiple tiers of production, making traceability extremely difficult.

Building on Our Efforts

This HRIA was a key milestone in our human rights strategy and deepened our understanding of salient human rights risks in the Amazon devices supply chain and the electronics industry as a whole. We will incorporate the results of this assessment into our overall business approach, continuing to improve our reporting and transparency and build on our progress. The assessment results pointed to several areas of opportunity. These include increased access to effective grievance mechanisms and remedy through strategic partnerships. We will further our efforts to incorporate social responsibility performance evaluation tools into our assessment of reverse logistics suppliers and work with our suppliers to increase their use of recycled or renewable materials in place of virgin materials. We are also scoping expansion of our human rights due diligence beyond conflict minerals to other minerals with human rights risk. Another critical opportunity includes deepening our engagement with external stakeholders to improve management of our salient human rights risks and identify opportunities for long-term partnerships to address systemic issues. As we implement the HRIA results based on priority, we will continue to identify opportunities to promote human rights across the Amazon devices supply chain.

