

Amazon France Logistique

Duty of Vigilance Plan 2020

Amazon France Logistique S.A.S. (hereinafter AFL) is a subsidiary of Amazon.com, Inc. (hereinafter referred to as Amazon). This Duty of Vigilance Plan for AFL was prepared in accordance with the requirements of the French Duty of Vigilance Law (French Commercial Code, Law No. 2017-399 of 27 March 2017, Art. L. 225-102-4) for the 2020 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 novel coronavirus (COVID-19). Amazon and AFL are committed to respecting human rights and operating in compliance with all applicable laws and regulations.

This plan reviews an assessment of human rights, health and safety, and environmental matters related to AFL's operations. It also provides information on actions the company is taking to assess, prevent, and mitigate these matters and maintain safe, respectful, and inclusive workplaces.

About AFL Operations

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 who 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, though AFL is not involved in final transportation to customers. AFL operates seven Fulfillment Centers in France. These are large logistics centers with modern facilities, rigorous safety policies, and highly automated processes of selection, packaging, and arrangement for shipping. Fulfillment Centers run multiple shifts per day, and employees perform several different shipping roles, from leading teams to boxing up orders and shipping directly to customers.

In the past 20 years, AFL has grown to have over 8,000 full-time employees supporting its operations. AFL is committed to diversity and inclusion. At our Fulfillment Centers, 6% of our employees are people with disabilities. In 2020, women made up 46% of AFL's workforce, and in 2019, AFL received a score of 94/100 on the gender equality index

designed by the French Ministry of Employment. AFL's score reflects its continuing commitment to increase women's representation at all levels. 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, or the payment of tuition fees for training recognized by the State. 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. AFL also launched the Amazon School program, allowing associates to leverage their experience in logistics to earn a degree certified by the State.

For the second consecutive year, in 2021 Amazon was certified as "Top Employer" by the Top Employer Institute in France. The Top Employers 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 is committed to strengthening communities where its employees live and work. In 2020, AFL supported more than 150 local

charities helping those impacted by the COVID-19 crisis, youth, and those in typically underserved communities. AFL works in partnership with 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. In 2018, AFL implemented Validation des Acquis d'Expérience (validation of professional experiences) to enable its employees to receive a diploma based on their work experience in order to further their employability.

Policies

Amazon's global policies outlined in this section also apply to AFL. Amazon is committed to ensuring the people and communities that support its entire value chain are treated with fundamental dignity and respect, and it strives to ensure the products and services Amazon provides are produced in a way that respects internationally recognized human rights. Amazon's approach is 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'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.

Amazon's [Supply Chain Standards](#) are derived from the UN Guiding Principles on Business and Human Rights, the UN Universal Declaration of Human Rights, the Core Conventions of the ILO, and the ILO Declaration on Fundamental Principles and Rights at Work. Amazon regularly review its Supply Chain Standards against policies developed by industry associations.

Governance

Management and Oversight

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 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 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 Amazon global corporate teams, and the policies, procedures, and programs implemented by these teams are detailed in the sections that follow.

Assessment of Priority Areas

Amazon's Social Responsibility team reviewed an assessment of potential risks associated with AFL's operations and supply chain based on the core international labor and human rights instruments cited in Amazon's [Global Human Rights Principles](#). The assessment focused on impacts to stakeholders across AFL's operations (directly employed and indirect contract workers, communities in areas where AFL Fulfillment Centers are located, and the operations of partners with whom AFL has established commercial relationships). The risk assessment included a review of reports by international and local organizations, 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 the company's operations. Along with several non-priority areas, the risk assessment focused on the following areas: hours and overtime, workplace discrimination, trade union rights, occupational injury and workplace stress, and solid waste.

This risk mapping is just one 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 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. 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 AFL employees and contract workers through the Amazon Ethics Line and reports allegations of violations of the Code of Business Conduct and Ethics to Amazon's Audit Committee.

Hours & Overtime

AFL has policies and workplace agreements that comprise its plan to actively manage risk related to working hours and overtime.

AFL working conditions are governed by the Transportation and Logistics Sector collective bargaining agreements (CBA). AFL employees are assigned work in 7-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. Additional compensation for nightshifts exceeds requirements outlined in the Transportation and Logistics Sector CBA. AFL employs temporary contract workers during peak periods.

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.

Workplace Discrimination

Human Resources and managers are notified if an AFL's anti-discrimination policy is part of its plan to address risk associated with workplace discrimination. Amazon has always been, and always will be, committed to diversity and inclusion, encouraging employees to bring their authentic, original, and best selves to work. Amazon, including AFL, provides equal opportunity in all aspects of employment and will not tolerate illegal discrimination or harassment of any kind. Employees are able to report issues to Amazon's Ethics line, and Amazon has a slate of inclusive programs to support a diverse community of employees.

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. Any associate who believes that he or she has been discriminated against or has suffered from harassment or retaliation for reporting discrimination or harassment should report it to his or her manager, or to any member of management at Amazon, or to Human Resources. Upon receipt of the complaint, the company will conduct a prompt investigation and will take appropriate 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. AFL is focused not only on hiring leaders from all backgrounds, but developing them internally. Amazon has 12 employee-led affinity groups—with more than 111,300 memberships held by 78,858 Amazonians. With 500 affinity group chapters worldwide, AFL employees provided with an unlimited time employment contract have access to affinity groups, including Amazon People with Disabilities, the

Black Employee Network (BEN) France, @Women, and Glamazon (for LGBTQIA+ employees and allies). These groups lead in community-building, mentorship, and programs to build awareness around customer inclusion.

Trade Union Rights

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 CBA of the Transportation and Logistics sector. Employees have representation as part of central and local works councils, which include health and safety commissions (these are new bodies since the 2018 reform, called "Comité Social et Economique"). AFL's Employee Relations team has ongoing dialogue with employee representatives and company trade union representatives, which enables AFL to have discussions with them on topics related to employees' concerns. In 2020, Employee Relations led negotiations with union representatives, resulting in a signed agreement addressing social dialogue during the COVID-19 crisis, with additional measures to ensure additional social dialogue for works council members and unions.

Occupational Injury & Workplace Stress

AFL has detailed Workplace Health & Safety (WHS) 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 and validate 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 include 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 restrictions and ergonomic assessment. In 2020, we concentrated on site-level ergonomics, identifying and implementing solutions at sites where musculoskeletal disorder (MSD) data showed there was higher risk. This year, we are focusing on targeting region-wide process changes that our data identified as being the main contributors to MSD risks, for example, improvements to adjustable height tables at employee work stations. This will enable us to identify more safety solutions for the business, while also upskilling the local WHS workforce. We are also focusing on preventing the risk of serious injury. At all of our sites we launched a campaign to prevent stair incident injuries and a safety enhancement program to avoid interaction between pedestrians and Powered Industrial Trucks (PITs) by installing physical barriers, ensuring 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.

Here are more Amazon innovations and technologies used to support employees and make their workplaces safer:

- **The Safety Leadership Index (SLI)** 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 which are asked include, "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 that enables new employees 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.

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. Here are some of the many ways AFL engages with its employees:

- **Ethics Line Alert Mechanism** Full-time, part-time, and temporary employees 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.
- **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 associate to discuss suggestions, concerns, or feedback with their manager, a Human Resources team member, or any member of the leadership team.
- **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. Leadership teams reply directly to questions, promoting dialogue and efficient remediation of issues.

- **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. AFL employees receive four COVID-19-related questions per week with the goal of identifying opportunities for improving safety protocols. These include questions about crowding at breaks, meals, and shift changes; distancing from others at workstations and breakrooms; if bathrooms are open and working well; and if everyone on an employee's shift is wearing their face covering properly, with nose and mouth covered. AFL employees also receive reminders to inform employees of COVID-19 safety rules and protocol.
- **Regular In-Person Meetings** Through all-hands meetings with General Managers, stand-up meetings with direct supervisors and regular roundtables with senior leadership, employees have daily opportunities to engage with leaders, raise issues, and make suggestions to continually improve the workplace.

Solid Waste

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. 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. Since 2015, Amazon has reduced the weight of outbound packaging by 33% and eliminated more than 880,000 tons of packaging material, the equivalent of 1.5 billion shipping boxes.

[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 also launched 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. Also, AFL conducts an Environmental Program Assessment at new sites to reduce overall environmental risk. Many of the cross-cutting sustainability issues Amazon prioritizes are enhanced through partnerships and collaborative initiatives with credible, knowledgeable, and innovative industry partners. More information about Amazon's plan to build a sustainable business can be found on its [Sustainability site](#).

Suppliers & Service Providers

AFL engages suppliers who provide materials and equipment to support its operations, such as packaging, labels, supplies, and consumables, and services that include but are not limited to construction, temporary labour, janitorial, professional, and utilities.

Amazon's goal is for its products and services to be 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 require compliance with Amazon's Supply Chain Standards. Amazon 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. 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 third party corporate social responsibility risk assessment organization EcoVadis to conduct an assessment of human rights, health, environment, and governance risks across first-tier suppliers of non-merchandise goods and services for Amazon's EU corporate operations, including Fulfillment Centers operated by AFL. While all AFL suppliers are based in Europe and rated low for country risk, the assessment identified suppliers of construction services, adhesives, packaging, signage, and plastic totes as those with the highest sector-level social and environmental risks. AFL suppliers and service providers identified as high risk and/or strategic are required to complete the EcoVadis self-assessment of their labour and human rights, environment, ethics, and sustainable procurement management systems. Where suppliers and service providers fail to complete the assessment or demonstrate consistently low performance, Amazon procurement teams engage the Worldwide Sustainability team for follow-up investigation and/or disengagement. AFL suppliers completed 201 EcoVadis assessments in 2020.

Addressing Health Impacts of Novel Coronavirus (COVID-19)

In facing the COVID-19 pandemic, Amazon's top concern is ensuring the health and safety of its employees. AFL conducted an assessment of health risks linked to COVID-19 in its fulfillment operations and reviewed all processes in order to integrate 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, body 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.



AFL gave extra time to employees during breaks to allow for COVID-19 sanitary measures to be properly respected. Employees and contract workers may raise concerns through their management chain, Human Resources, health and safety communications channels, or through the Ethics Line alert mechanism. 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 signed an in-house agreement related to the preventative measures in place. In 2020, a third-party conducted COVID-19 audits at AFL facilities and found AFL 90% compliant across audit indicators including implementation of employee COVID-19 training, social distancing measures, and a risk assessment, commenting that Amazon engaged in best COVID-19 practices among industry peers. Daily updates highlighting Amazon's efforts to combat COVID-19 can be found on our [website](#).

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