

Duty of Vigilance Plan 2022

Amazon France Logistique S.A.S



This Duty of Vigilance Plan, published in December 2023, 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 2022.



Contents

1. Introduction	3
1.1. About This Plan	3
1.2. Public Commitment To Respect Human Rights	3
1.3. Engagement With Stakeholders	3
1.4. About Amazon France Logistique S.A.S.	4
1.5. Governance Structure for Human Rights, Health and Safety, and the Environment	4
2. Mapping of Risks	5
2.1. Methodology	5
2.2. Identification and Prioritization of Risks	5
3. Due Diligence Processes in Place	5
3.1. Working Hours and Overtime	5
3.2. Wages and Benefits	6
3.4. Occupational Injury and Workplace Stress	8
3.5. Solid Waste Management	9
4. Suppliers and Service Providers	10
5. Alert or Grievance Mechanisms	10

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 2022 calendar year. AFL has no affiliated entities under the scope of the Duty of Vigilance Law. 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 December 2022 Amazon published its updated [Supply Chain Standards](#), working with external stakeholders to align its requirements with current best practices and regulatory standards. Amazon's Supply Chain Standards apply to all suppliers of goods and services for Amazon and Amazon's subsidiaries and set forth requirements governing labor rights and working conditions.

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, general managers, transportation operations management reflecting a diversity of individuals, 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.

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.

1.4. About Amazon France Logistique S.A.S.

Supported by innovative world-class technologies, Amazon's global network of Fulfillment Centers, Sort 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 operates eight Fulfillment Centers in France and provides logistics services relating to storage, collection, packing, and processing of orders for the benefit of other Amazon entities that own and/or manage inventory and stocks. At AFL Fulfillment Centers, inventory comes in from manufacturers, vendors, and selling partners and is shipped out directly to customers or to other Amazon facilities that place the goods into the national delivery network under optimized routes. Other Amazon entities or third parties perform subsequent sortation and transportation to customers.

AFL's infrastructure has evolved over time to meet the diverse and varied needs of its customers. Most of its work is done outside the company's headquarters, in its technology centers, and in the eight Fulfillment Centers of Amazon in France. Its network of Fulfillment Centers is equipped with advanced technologies and comprised of buildings of all sizes.

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.

During 2022, the number of AFL's permanent employees increased by 3,869 to a total of 15,629 (11,760 in 2021). In addition, to support permanent employees AFL also hires temporary workers during high-activity seasons. In 2022, women made up 45.5% of AFL's workforce. Further, in 2022 AFL repeated its score of 99/100 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. 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 Fulfill-

ment 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.

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, in consultation with local sites and operational teams, such as AFL's Director for Human Resources who oversees related activities, and the managers who coordinate due diligence activities and engage onsite with associates and suppliers. The policies, procedures, and programs implemented by these teams are detailed in the sections that follow. In 2023, AFL committed 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 site and operation management. In addition, the assessment included three site visits to AFL Fulfillment Centers as well as one Sort Center and one Delivery Station as part of AFL's value chain. These site visits included floor visits, focus group discussions with a cross section of AFL managers and team leaders, associates, and contract workers (such as cleaning, security, canteen,

and maintenance), reflecting a diversity of individuals including women employees and individuals, from underrepresented communities. Consultancy experts also interviewed external stakeholders from French civil society organization and trade unions.

2.2. Identification and Prioritization of Risks

The risk assessment focused on the following areas:

- **Human Rights**
 - Wages and Benefits
 - Working Hours and Overtime
 - Workplace Discrimination
 - Freedom of Association and Trade Union Rights
 - Women's Rights and Gender Equity
 - Impacts on Local Communities
 - Freely Chosen Employment
 - Access to Grievance Mechanisms and Remedy
- **Health and Safety**
 - Occupational Injury and Workplace Stress
- **The Environment**
 - Solid Waste Management
 - Energy Consumption and Climate Change Impacts
 - Impacts on Biodiversity

As a result of the AFL mapping exercise, the priority risks identified in 2022 were working hours and overtime, workplace discrimination, occupational injury and workplace stress, and solid waste management.

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. Working Hours and Overtime

AFL proactively manages risks of adverse impact on employees and workers' physical or mental health due to work hours and overtime by adopting measures to prevent and control such risk.

AFL working conditions are governed by the Transportation and Logistics Sector CBAs. 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. AFL provides additional compensation for overtime and night, weekend, and holiday shifts. Human Resources (HR) 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).

Overtime is optional and encouraged on a voluntary basis across AFL's sites to enable the flexibility that different shifts can provide to accommodate people's personal situations. Trade unions and AFL management are also actively communicating about how to develop mechanisms to accommodate employees for whom existing shift times are difficult. Collective agreements on night and weekend shifts ("*accords de suppléance*") are subject to renegotiation in 2023.

In addition, AFL also renewed the policy allowing staff to take unpaid leave for up to three days per year without justification. Employees could donate paid leave to colleagues with a sick child, and AFL voluntarily added an employer contribution to such donations.

AFL leverages physical means of communication (e.g., strategically located information boards) as well as digital channels and engagements with workers to maximize reach and continuously raise visibility and understanding of updated policies on workplace-life quality and the importance of well-being. For example, on-site leaflets and board postings in 2022 included topics such as the new social assistance regime on-site as well as information around parental leave, paid absence for sick child, and tips on how to stay healthy. Weekly newsletters that included such practical information as well as news concerning each site were also posted in high visibility places, including bathroom stalls. In 2023, AFL continues to invest resources in communications aimed at raising awareness on the importance of well-being and the latest policies aimed at supporting a healthy work-life balance.

To improve the accessibility of Fulfillment Centers

and to minimize commute times for workers, AFL promoted a carpooling app across sites, while individual sites continued to coordinate with local public bus providers to improve times. For example, during peak season in 2022, AFL implemented shuttle routes to and from the Augny Fulfillment Center and to and from key collecting points.

In 2023, AFL is taking additional measures to expand and further the success of the above initiatives and support access to public transport for employees.

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), paternal leave paid at 100%, "*Pebble*" parental leave (paid at 100% for up to four weeks) and "*prime de naissance*". Employees also rapidly gain access to a range of benefits including a 13th month salary, a yearly bonus equivalent or more than a 14th month's pay, and transport allowance ("*forfait mobilité*"). Employees can expect their salaries to increase after 12 months, and again after 24 months. 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 confirm competitive compensation for employees.

In 2022, mandatory annual salary negotiations ("*négociation annuelle obligatoire*" or NAO) resulted in a 3.5% increase to base salaries, plus an end of year bonus, and a "Prime Macron" for eligible employees. In 2023 AFL's priorities include the increase of salaries to counter the effect of 2022 inflation and the recent readjustment of the French legal minimum wage, and to catch up with AFL's historically competitive wages for entry-level positions.

The use of temporary staff on AFL sites is strictly connected to temporary increases in business activity or temporary replacement of permanent staff, as recorded in the employment contract. In 2022, temporary workers received the same pay as AFL employees coupled with additional indemnities in compensation for their temporary status, and additional benefits such as medical insurance from the staffing agencies through which they contract. They also benefitted from all the same on-site amenities as well as the Q4 bonus and "*prime de partage de valeur*".¹ In 2023, AFL committed to pursuing permanent positions to the extent that

¹ This is value sharing bonus, formerly called the Macron bonus or purchasing power bonus, and it is a system which allows the employer to pay the employee a bonus. This is a long-term system that companies can put in place each year. The premium remains optional. Its payment depends on a decision taken by the employer or a company agreement. The conditions for obtaining a tax exemption from this bonus vary depending on the date of its payment. Source: <https://www.service-public.fr/particuliers/vosdroits/F35235>

activity levels permit and limiting use of temporary staff to the above-mentioned circumstances.

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 proactively manages risks of discrimination and 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.

AFL sites offered trainings on diversity and inclusion for employees. AFL's policies that promote women's rights and equality between men and women include paid paternity leave, 4 weeks of "Pebble" leave, and

availability of breastfeeding rooms. In 2023, AFL committed to adjusting working hours for employees undergoing In vitro fertilization (IVF) and measures to support older staff, such as paid leave for IT trainings and tailored campaigns on recruiting older staff and combatting prejudice.

As an inclusive company, Amazon is also committed to the professional inclusion of persons with disabilities and in 2019 signed the Manifesto for the inclusion of people with disabilities in economic life. Each site works to enhance professional inclusion of persons with disabilities, whether through programs for existing employees with disabilities or in the recruitment of permanent and temporary workers with disabilities. Local associations and entities operate on-site to promote diversity and inclusion in many ways (e.g., Aurore, Mission Handicap). AFL maintains a partnership agreement with the *Association des Paralysés de France*, and sites enable employees through individual adjustments and support, including workstation adaptations and training of dedicated representatives.

Amazon has 13 employee-led affinity groups in hundreds of chapters globally comprised of more than 100,000 employees who passionately and positively impact the company. Affinity groups serve employees in many different ways from sharing their experiences and perspectives to expand cultural understanding, to serving as a voice of the customer for businesses and central teams to connect with people in the communities where AFL works, lives, and plays. Each 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 & Global Business Services Initiative. Amazon engages and consults their leaders and seeks their ideas to improve inclusion efforts internally and externally.

In 2023, AFL continued 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 employees about how to raise concerns related to workplace discrimination, AFL implemented 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.

AFL proactively manages risks of injury and workplace stress. Amazon's strong proactive health and safety plans are in place to identify, assess, prevent, and remediate risks, especially related to occupational injury. AFL's health and safety management policies are consistently implemented across AFL's operations and audited annually to ensure compliance with local regulation and alignment with Amazon's global Environmental, Health and Safety (EHS) management system. The global EHS team works with colleagues in Europe and France, including a Regional Work, Health & Safety (WHS) manager, on-site WHS managers, and ergonomics specialists in some Fulfillment Centers and on-site Occupational Health services, including medical support and nurses. Safety teams at each facility are in charge of incident investigations, metrics, and audits. Clear processes exist for recording incidents and near misses and for escalating "safety alerts" for review and feedback, as well as sharing insights and information across Fulfillment Centers.

Onboarding includes mandatory safety-related comprehensive trainings called Safety School, and safety is also addressed regularly during daily and weekly routines that feature safety tips at shift kick-offs, daily deep dives, safety-related walks on the floor, and questionnaires that aim at measuring associate and leader perceptions of site leadership's focus on a safe

workplace. Employees are also encouraged to take ownership of their own safety and share feedback with any concerns or suggestions, including through physical boards available on site. The importance of good posture and gestures is emphasized by warm-up at shift start as well.

The social and economic committee (CSE) includes a sub-committee dedicated to health & safety (the "*Commission Santé, Sécurité et Conditions de Travail*" or CSSCT), to which has been delegated the responsibility to investigate workplace incidents or work-related medical conditions and to study challenges related to the employment of youth and persons with disabilities.

AFL established 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.

Site management seeks continuous feedback from employees, and public boards consistently track actions taken as a result of such feedback and raise awareness about them. 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 is a program designed to increase employees' involvement in the site's safety program. It increases employee involvement by encouraging the identification and elimination of hazards 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.

In 2022, AFL focused on site-level ergonomics and on identifying and implementing solutions to Musculoskeletal Disorders (MSDs), notably with the deployment of adjustable height work stations and hiring of ergonomics specialists. Training of employees across multiple processes and enforcement of regular rotations within shifts and throughout the year are additional measures Amazon has adopted to mitigate both ergonomic risks and "psychosocial" risks by reducing impact of task repetition. Existing measures to address mental health and workplace stress include: onboarding training, employee assistance program, new on-site social workers socialized through leaflets and on-site info boards, and regular on-site social activities. AFL commits to strengthen its Worker Health & Safety policies and standards in relation to mental health risks, and to promote the sensitization of managers and team leaders to mental health.

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.

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. [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. Since 2021, Amazon has stopped using single-use plastic sleeves to package items in its distribution network in France, and has replaced them with paper sleeves and recyclable cardboard envelopes.

Notwithstanding the work to reduce plastic packaging materials, there are a few instances where customers in France may still receive products in plastic packaging.²

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.

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, supplemented by regular audits and Energy Efficiency Audits. 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 addition:

- AFL drafts and implements Waste Procedures for the safe and compliant management of waste in accordance with sites' operational permits (*Arrêtés Préfectoraux*).
- 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" incentive that compensates employees who use less or non-polluting modes of transport for home-to-work journeys.

More information about Amazon's plan to build a sustainable business can be found on [Amazon's Sus-](#)

² For more information, see <https://www.aboutamazon.fr/actualites/durabilite/amazon-va-cesser-dempaqueter-les-produits-dans-des-pochettes-de-livraison-en-plastique-%C3%A0-usage-unique-dans-son-r%C3%A9seau-de-distribution-en-france-dici-la-fin-de-lann%C3%A9e>

[ustainability site.](#)

In 2022, AFL implemented consistent policies across all its Fulfillment Centers regarding waste management, including sorting, collection, and waste treatment channels. The objective for 2023 continues to be to increase the quantity of recycled waste at each site.

4. 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](#), last updated in December 2022. 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. Amazon operates on a policy of continuous improvement, and is committed to working with suppliers to embed respect for human rights and the environment in their operations and supply chains, improve protections for their workers and workplace, and address nonconformance with these Standards. AFL strives to always put the interests of workers first. AFL encourages, or mandates where required by law, suppliers to engage in human rights and environmental due diligence to identify, prioritize, and address their most salient risks, adopting and maintaining effective management systems as outlined in the Standards. Third-party service providers that employ on site contractors must also pass a health and safety assessment. 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 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.

Amazon continues to develop preventive measures, including trainings available for contract managers, to enable deeper understanding of Amazon's responsible sourcing methods and application of Amazon's Supply Chain Standards. Amazon also continues to reinforce with suppliers the expectations set forth in Amazon's Supply Chain Standards.

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 employees about the Ethics Line, AFL will continue implementing measures to raise visibility and understanding of the Ethics Line, and also engage with employees' 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 2022 included safety improvements and workplace inclusion. 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** are boards in Fulfillment Centers that Amazon maintains around the globe, including in AFL's sites, providing employees a forum for expressing their thoughts, concerns, and questions on a daily basis to leadership, in physical boards as well as digital form through the A to Z App available to all employees. AFL's Leadership teams reply directly to every question, promoting dialogue and efficient remediation of issues on site.
- **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. Examples of this include regular and informal gatherings when employees meet with the General Manager and HR manager of the site to connect and have open conversations; weekly team connects that every manager holds with five employees on a rotating basis to discuss a wide range of topics, including safety and feedbacks around processes or equipment. Other team connects include 1 to 10 meetings on the same subject.
- **Continuous Improvement** allows employees on the floor to raise ideas for process improvements, surface them through management and work with department specialists to conduct a feasibility study, which could potentially lead to global level improvements. In 2023, AFL plans to make this program more readily available to employees through the A to Z App.

This plan was signed by:

David Lewkowitz

David Lewkowitz
President, Amazon France Logistique S.A.S.

Fred Pattje

Fred Pattje
Director of Amazon Customer Fulfillment in France,
Italy, and Spain

Frédéric Duval

Frédéric Duval
Country Manager, Amazon France