# Modern Slavery Statement

**Amazon** 





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# Introduction

Amazon's policies, practices, and procedures to assess and address the risk of modern slavery (including child labor) apply to our operations and supply chains worldwide. This statement describes the actions taken by Amazon.com, Inc. and its covered subsidiaries (hereafter collectively referred to as "Amazon")<sup>1</sup> during the period from January 1, 2023 to December 31, 2023.<sup>2</sup>

The statement has been prepared in compliance with the requirements of the Australia Modern Slavery Act 2018,<sup>3</sup> the California Transparency in Supply Chains Act 2010, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023,<sup>4</sup> and the United Kingdom Modern Slavery Act 2015.

Amazon is committed to treating our own employees and people who are connected to our business with fundamental dignity and respect; and this includes a commitment to freely chosen employment. We do not tolerate any form of modern slavery. For the purposes of this Statement, we use the term modern slavery to mean child labor, forced labor, and human trafficking in any form - including slave labor, prison labor, indentured servitude, or bonded labor.

The fight against modern slavery requires a holistic approach, including commitment, resources, and innovative solutions from governments, international organizations, the private sector, and civil society. At Amazon, we understand the unique responsibility of the private sector in these efforts and are committed to expanding our work to understand and address modern slavery risks that may arise in the course of our business.

In 2023, we actively engaged with diverse stakeholders, including industry associations, non-governmental organizations, suppliers, and other companies, to strengthen our efforts to identify, prevent, and address the risk of all forms of modern slavery in our operations and business relationships. We helped increase our suppliers' awareness and understanding of our Supply Chain Standards through trainings, workshops, and resources, updated our modern slavery training available to Amazon employees, and introduced a new way for members of the public to notify us about human rights concerns. We enhanced our partnerships with industry associations and non-profit organizations to further develop best practices in addressing risks of modern slavery. We are committed to continuously improving our approach to, and policies surrounding, prevention of modern slavery.

This statement assesses our risk, outlines our efforts, and sets commitments for the coming year.

<sup>1</sup> This statement excludes any entity that elects to report independently.

<sup>2</sup> Metrics contained herein cover 2023 activities, unless otherwise indicated.

<sup>3</sup> The Australian subsidiaries that are required to report under the Modern Slavery Act 2018 for 2023 are Amazon Commercial Services Pty Ltd ABN 30 616 935 623, Amazon Corporate Services Pty Ltd ABN 95 082 931 600, Amazon Support Services Pty Ltd ABN 77 163 823 416, Amazon Web Services Australia Pty Ltd ABN 63 605 345 891, and Audible Australia Pty Ltd ABN 89 624 383 811. Amazon Corporate Services Pty Ltd owns and controls Amazon Australia Company Pty Ltd ACN 663 812 468, and Amazon Support Services Pty Ltd owns and controls Selz.com Pty Ltd ABN 29 163 769 837.

<sup>4</sup> The Canadian subsidiaries covered by this Statement are Amazon Development Centre Canada ULC, Amazon.com.ca ULC, and Amazon Canada Fulfillment Services, ULC.



## **Our Business**

Amazon is a global company, headquartered in Washington's Puget Sound region and Arlington, Virginia, in the United States, with approximately 1.5 million full- and part-time employees worldwide and operations in Africa, Asia-Pacific, Europe, United Kingdom, Latin America, the Middle East, and North America.

We offer products and services—both Amazon-branded and from many other brands and third-party sellers—in our Amazon stores, leveraging advanced transportation logistics to deliver globally. We also create entertainment content and, through Amazon Web Services (AWS), provide cloud services. Our operations are organized into three segments: North America, International, and AWS. In each of our segments we serve our primary customer sets, consisting of consumers, sellers, developers, enterprises, content creators, advertisers, and employees.

We procure materials, commodities, components, finished goods, and services from a complex supplier network. Our global supply chains consist of a broad assortment of both direct and indirect suppliers who provide a diverse range of products and services, including, but not limited to, finished products, raw materials, packaging materials, logistics, and transportation services. Our logistics and fulfillment network relies on a combination of suppliers of non-inventory goods (e.g., packaging and labels, robotics and equipment), and on- and off-site service providers, including delivery partners. For example, Amazon-branded digital devices (Kindle, Fire TV, Fire Tablet, Ring, and Echo) have a raw and recovered materials supply chain that is a complex system of sellers, buyers, traders, producers, processors, and manufacturers across multiple tiers and sourcing regions around the world. For these devices, supply chain categories include facilities and suppliers involved in the final assembly of Amazon devices and component manufacturing, reverse logistics, minerals and metals, and plastics and synthetics. For more information on the supply chain for Amazon Devices, please see a summary of our Human Rights Impact Assessment for Amazon Devices.

We serve consumers through our online and physical stores.<sup>5</sup> We design our stores to enable hundreds of millions of unique products to be sold by us and by third parties across dozens of product categories. Customers access our offerings through our websites, mobile apps, Alexa, devices, streaming, and by physically visiting our stores. We also manufacture and sell electronic devices, and we develop and produce media content. In addition, we offer subscrip-

tion services such as Amazon Prime, a membership program that includes fast, free shipping on millions of items, access to award-winning movies and series, and other benefits. We fulfill customer orders in a number of ways, including through: North America and International fulfillment networks that we operate; co-sourced and outsourced arrangements in certain countries; digital delivery; and through our physical stores. We operate customer service centers globally, which are supplemented by co-sourced arrangements.

We offer programs that enable sellers to grow their businesses, sell their products in our stores, and fulfill orders using our services. We are not the seller of record in these transactions. We earn fixed fees, a percentage of sales, per-unit activity fees, interest, or some combination thereof, from our seller programs.

We serve developers and enterprises of all sizes, including start-ups, government agencies, and academic institutions through AWS, which offers a broad set of on-demand technology services, including compute, storage, database, analytics, machine learning, and other services.

We offer programs that allow authors, independent publishers, musicians, filmmakers, Twitch streamers, skill and app developers, and others to publish and sell content.

We provide advertising services to sellers, vendors, publishers, authors, and others, through programs such as sponsored ads, display, and video advertising.

With operations and supply chains spanning the globe, Amazon is committed to improving the working conditions of people who are connected to our business, and we recognize the need to monitor for conditions that put workers at risk of modern slavery. More information about Amazon can be found in our most recent <u>Sustainability Report</u>, Annual Report, and our latest Proxy Statement.

# **Our Governance**

Amazon is committed to embedding respect for human rights throughout our business activities and relationships, including into our policy and governance framework. Amazon's Board of Directors is responsible for the control and direction of Amazon. The full Board regularly reviews reports from management on various aspects of our business, including related risks and strategies for addressing them. While the full Board has overall responsibility for risk oversight, the Board has delegated responsibility for certain risks to the Nominating and Corporate Governance Committee.



The Board's Nominating and Corporate Governance Committee oversees and monitors Amazon's policies and initiatives relating to corporate social responsibility, including human rights and ethical business practices, and risks related to Amazon's operations and engagement with customers, suppliers, and communities.

For more information on the responsibilities of the Nominating and Corporate Governance Committee, please see our most recent <u>Sustainability Report</u> and Investor Relations website.

### **Our Policies**

Our efforts to assess and address risks of modern slavery across our business and supply chains are anchored in our policies. Our policies convey our values and expectations, setting a high bar for ourselves, our suppliers, and our selling partners, making clear we do not tolerate modern slavery. We regularly review our strategies, principles, and supporting policies to identify opportunities for improvement. By engaging external stakeholders and monitoring evolving international and human rights standards, regulations, and industry best practices, we are able to effectively and continuously improve our own policies and standards to better support our employees and our suppliers.<sup>7</sup>

#### **Global Human Rights Principles**

Our Global Human Rights Principles demonstrate our commitment to respecting fundamental human rights and the dignity of people connected to our business around the world. We are committed to ensuring that the products and services we provide are produced in a way that respects human rights, including the right to freely chosen employment. Our Global Human Rights Principles also state that we do not tolerate the use of child labor, forced labor, or human trafficking in any form—including slave labor, prison labor, indentured servitude, or bonded labor—in our operations or value chain. These principles are informed by leading international standards and frameworks developed by the United Nations (UN) and the International Labour Organization (ILO). Amazon is committed to respecting and supporting 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.

#### **Code of Business Conduct and Ethics**

Our <u>Code of Business Conduct and Ethics</u> (Code of Conduct), associated policies, procedures, training, and communications outline our expectations of our employees. All employees receive Code of Conduct training during onboarding, with regular refresher training thereafter.

Amazon provides its employees various secure and accessible channels with guidelines for reporting concerns and violations. Employees can reach out to anyone in their management chain or the Legal Department with questions about the application of the Code of Conduct or how to approach difficult workplace situations. Employees may also make reports online or via phone through the Amazon Ethics Line, which is managed by an independent third party, and remain anonymous on request. The Ethics Line is currently available in more than 60 countries in 165 languages.

Any employee can also email suggestions or complaints to senior leadership. All escalations are reviewed by Human Resources and may inform process updates to prevent future gaps.

We prohibit retaliation and take all allegations seriously. Our Business Conduct and Ethics team records, investigates (or directs others to investigate), reports alleged violations of the Code of Conduct to the Audit Committee of the Board, and tracks any remediation required. Employees must cooperate in internal investigations of potential or alleged misconduct, with those who violate the Code of Conduct subject to disciplinary action up to and including discharge.

#### **Supply Chain Standards**

Publicly available in 21 languages and dialects and derived from relevant international standards and frameworks, our <u>Supply Chain Standards</u> (also referred to as "our Standards") are the backbone to our efforts to enable a responsible supply chain.

Our Supply Chain Standards apply to suppliers of goods and services for Amazon and Amazon's subsidiaries, including providers, vendors, selling partners, contractors, and subcontractors (collectively "suppliers"). All products sold in Amazon stores, and all products and services provided to Amazon, must be produced or provided in accordance with our Supply Chain Standards. Suppliers are required to conform to our Standards and must follow all applicable laws and regulations. When applicable law conflicts with our Standards, suppliers must follow the law while finding ways to respect the principles of internationally recognized human rights and the expectations contained in the Standards. We encourage suppliers to perform human rights and

<sup>6</sup> Selling partners are vendors and third-party sellers that sell or supply products and services in Amazon's stores.

<sup>7</sup> We update our Global Human Rights Principles at least every five years and our Supply Chain Standards at least every three years. Our latest update to the Supply Chain Standards was published in 2022.

environmental due diligence to ensure their products and services are produced and supplied in ways that respect human rights and the environment and protect the fundamental dignity of workers.

Our Supply Chain Standards mandate that all workers must be treated with respect and dignity. Suppliers must not engage in or tolerate violence, harassment, abuse, or coercion, including physical, verbal, sexual, or psychological, or any form of torture or cruel, inhuman, or degrading treatment. Our Supply Chain Standards require that all work must be voluntary and workers must be free to leave work and terminate their employment or other work status with reasonable notice, without penalty. Suppliers must not cause workers to lose possession of or access to their personal documents. Before they enter into employment or prior to departing their country of origin, workers must be given clear, understandable documentation that defines the terms and conditions of their employment in a language and manner they understand, with preference for each worker's native or best understood language and/or visual images for workers with lower literacy levels. Amazon's Supply Chain Standards recognize domestic and foreign migrant workers' unique vulnerability to risks of exploitation and make clear that workers may not be charged fees at any point in the recruitment process. We expect our suppliers to analyze and monitor the practices of recruitment agencies and labor brokers and to employ agencies that act ethically and in the best interests of workers. In cases where remediation measures are taken, we will consider whether additional steps are necessary to address the income loss experienced by the most vulnerable families impacted by these measures.

In addition, our Standards require suppliers to engage workers who are: (i) at least 15 years old, (ii) the age of completion of compulsory education, or (iii) the minimum age to work in the country where work is performed, whichever is greater. Workers under the age of 18 ("young workers") must not perform hazardous work, including that which is likely to jeopardize their health or safety, or work that compromises their education (e.g., night shifts, overtime). If cases of child labor are identified our Standards mandate remediation, including through corrective measures that facilitate the child's safety and wellbeing.

# **Assessing Our Risk**

Understanding our modern slavery risk is critical to our actions and partnerships to prevent and address the issue. Amazon's centralized team of experts work across the company to conduct human rights and environmental due diligence. Through this work, Amazon takes steps to assess and prioritize risks,

takes action to address and mitigate identified risks, measures progress, and remediates harm when issues occur.

In line with the UNGPs, identifying and prioritizing the most salient risks, including with respect to modern slavery, connected to Amazon operations and business relationships is central to our human rights due diligence practices. As we continuously improve and expand these practices, we use human rights assessment methodologies to identify and mitigate human rights risks. These assessments help us understand the causes of systemic issues, enhance ongoing engagement with critical stakeholders, implement the right risk-based mitigation measures, and refine strategies for ongoing risk management across our supply chain. Examples of human rights assessment methodologies include:

- Human rights saliency assessments, which focus risk management action and remediation on the most severe risks relevant to a company's business activity.
- Human rights impact assessments (HRIAs),
   which examine a particular business segment
   or product, a country of operation or sourcing,
   a potentially affected group, or other human
   rights risk areas for a specific subset of a business.
- Human rights due diligence management assessments, which analyze a business's internal capacity to assess and respond to human rights risks.

These assessments allow us to identify salient risks, build capacity and business-level ownership aligned to those risks, and conduct targeted human rights and environmental due diligence to monitor and manage compliance.

For more information about our 2020 enterprise-wide human rights saliency assessment, our human rights risks, and our human rights assessments, please see our 2023 <u>Sustainability Report.</u><sup>8</sup>

Our modern slavery risk assessment practices are informed by:

#### **Vulnerable Groups**

Modern slavery experts and leading non-governmental organizations play a key role in helping us identify modern slavery risks associated with our supply chain and operations. While modern slavery can impact any population, we recognize certain groups are particularly vulnerable, including:

<sup>8</sup> The concept of salience uses the lens of risk to people, not the business, as the starting point, while recognizing that where risks to people's human rights are greatest, there is often strong convergence with risk to the business. United Nations Guiding Principles Reporting Framework.

- Domestic and foreign migrant workers
- Contract, agency, and temporary workers
- Refugees, asylum seekers, ethnic/religious minorities, and displaced persons
- Young or student workers
- Indigenous peoples

#### **Region-Specific Risk**

Even though modern slavery can be found in all countries, we take into account region-specific risks. Based on globally accepted risk indices such as the World Bank's Worldwide Governance Indicators, the Global Slavery Index, and those issued by the US Department of Labor, ILO, and UNICEF, we understand that certain countries may present higher risks for modern slavery; for example, countries with large populations of migrant workers, with weaker labor law enforcement, where charging workers recruitment fees is common practice, or where modern slavery prevalence has been well documented. We use a risk-based approach tailored to the regional context to identify country-specific risks and implement site-level requirements to help build local suppliers' capacity to meet our standards. In countries identified as higher-risk, we mandate participation in Better Work - a joint program of the ILO and the International Finance Corporation (a member of the World Bank Group) - that works directly with factories, workers, and their representatives to support greater compliance with national labor laws and international labor standards through assessments, training, advocacy, and research. Where Better Work is unavailable, we require participation in an Amazon-managed audit. Alongside these targeted interventions, we participate in and offer our suppliers a wide array of central and local capacity-building programs. These enable suppliers to develop their in-house capabilities and improve social compliance performance. We continually review our supply chain footprint to evaluate where additional due diligence, partnership, and collaboration are needed.

#### **Our Supply Chain**

We understand that our supply chains, including for our Amazon-branded products,<sup>9</sup> present a need for focused efforts to assess the risk of modern slavery. We prioritize the protection of human rights within our supply chain and regularly engage suppliers on key human rights issues. We routinely evaluate our supply chains to understand the highest risks to workers and prioritize our efforts to address both site-specific challenges and broader, systemic risks.

We require suppliers to continuously monitor and enforce our Supply Chain Standards in their own operations and supply chain, including with subcontractors. Suppliers are encouraged to self-evaluate and make improvements to meet or exceed our expectations and those of our customers as reflected in our Standards. We encourage suppliers to continuously assess their risks specific to groups that may be more vulnerable to exploitation, including women, children, indigenous peoples, and temporary or migrant workers.

For both our operations' non-inventory products and services and our Amazon-branded products, we engage with internal and external stakeholders, evaluate country- and industry-level risks, and conduct regular risk assessments that include worker and management interviews, document reviews, and on-site visits and audits. For our Amazon-branded products, we also regularly consult industry experts to review our approach to risk assessment against globally recognized international standards and industry best practices.

Audits are conducted for suppliers who manufacture products that are Amazon-branded and who provide services (e.g., staffing agencies, janitorial companies) or not-for-resale goods in our operations. We assess these suppliers globally during onboarding and periodically thereafter to evaluate their compliance with our Supply Chain Standards. Auditors conduct regular site inspections, confidential worker interviews or surveys, and review and analyze site documents or licenses. When an audit finding requires a more hands-on approach, we also send Amazon teams or third-party experts to conduct further assessments. We assess suppliers against modern slavery indicators, for example where an employer does not communicate the full terms of employment, does not give clear documentation defining those terms in a language the worker understands, does not give required notice of overtime, collects recruitment and related fees that can lead to debt bondage, or takes a worker's identification document.

To date, we have focused our efforts on our products supply chains. However, over the past two years, we increased our investments in identifying and addressing the highest risks across the supply chains related to our own operations. At the supplier site level, we look for modern slavery indicators that can suggest heightened risk, including the presence of workers who are part of vulnerable populations, a supplier's failure to deliver on a promised term of employment, restriction of worker movement, a supplier's retention of identity documents, and debt bondage indicators, such as charging recruitment fees or mandatory overtime. This data informs our

<sup>9</sup> Amazon-branded products are apparel, consumer electronics, food and beverage, and home good products such as Amazon Basics, Amazon devices (e.g., Kindle, Fire TV, Echo) or other private labels owned by Amazon. This includes any product manufactured or co-manufactured by Amazon, including its subsidiaries.



efforts to respond to those risks.

As described in further detail below, we are developing regional and country-level strategies tailored to specific social, cultural, economic, and regulatory contexts and have ongoing due diligence in place to address these risks.

# **Addressing Our Risk**

We aim consistently to deliver progress and expand our work to understand and address any modern slavery risks that may arise in the course of our business.

#### ...with our suppliers of Amazon-branded products

We support our suppliers to meet our Standards. Amazon continuously works to make its suppliers aware of our Supply Chain Standards and supports their efforts to build the skills and mechanisms to meet them. We have dedicated teams in key sourcing regions that engage directly with suppliers to communicate our Supply Chain Standards. We also continuously monitor regulations in the countries where we operate and actively engage with our teams and suppliers to meet new regulatory requirements.

Throughout our relationship with our suppliers, we provide resources and training to help them strengthen their ability to respect human rights within their own workplace and supply chain. In 2023, we hosted in-person and online training events on our Supply Chain Standards. We also launched a new in-person peer-learning workshop series that convenes factory management to hear from industry experts and share best practices for addressing common challenges in Bangladesh, Cambodia, China, Malaysia, Saudi Arabia, Singapore, Taiwan, Thailand, and the United Arab Emirates.

We are building efforts to amplify the voice of workers in our supply chain. We want all workers in our supply chain to have the ability to voice their concerns in a safe and confidential manner. To do this, we connect suppliers and service providers with trusted tools, products, and systems to hear directly from workers about their experience and support the resolution of issues from workers' perspectives. With these mechanisms, suppliers can gather feedback directly from workers to inform more effective issue resolution. In 2023, we helped connect supplier sites across Bangladesh, Cambodia, China, India, Malaysia, Pakistan, and Thailand with independent grievance mechanisms.

In 2023, we expanded the scope of our program to additional supplier segments across our operations supply chain. In Japan, we partnered with the Japan

Platform for Migrant Workers towards Responsible and Inclusive Society (JP-MIRAI) so that certain suppliers in Japan could provide their workers access to JP-MIRAI's independent grievance mechanism.

We continue to improve our responsible sourcing program for Amazon-branded products. Our responsible sourcing program works to reduce risks and help safeguard the rights of workers, especially those considered part of a vulnerable population or who work in countries associated with a higher modern slavery risk.

Supply chain transparency is a valuable tool to address risks in our supply chain and identify opportunities for collaboration on systemic supply chain issues. We publish a supplier list and interactive supply chain map with details on over 2,220 finished-product suppliers of Amazon-branded apparel, consumer electronics, food and beverage, and home goods products. We also contribute this supplier list to the Open Supply Hub to foster brand collaboration and action in the industry. Open Supply Hub is an accessible, collaborative supply chain mapping platform, used and populated by stakeholders across sectors and supply chains. In 2023, we leveraged the platform's Embedded Map, which lists facilities producing Amazon-branded products. The Embedded Map allows users to easily interact with facility data and have a transparent look into Amazon's supply chain.

We provide data from supplier audits annually in our Sustainability Reporting, including year-over-year data on high- and medium-level issues in our supply chain and actions to address our human rights risks. We engage in due diligence of suppliers of Amazon-branded products. Our <u>Supplier Manual</u> provides an overview of our due diligence processes.

# Table 1: 2021, 2022, and 2023 related audit findings

We accept audits completed by qualified independent audit firms based on our own audit standards and those of industry associations, including Sedex (SMETA), amfori (amfori BSCI), the Responsible Business Alliance (RBA), the certification standard Social Accountability International (SA8000), and the Better Work program.

#### Continued on next page

Related Findings <sup>10</sup> % of audits where issue was		ere issue was found		
	2021	2022	2023	
Incomplete employment information				
Employment documentation did not include relevant information on the nature of work, working hours, wages, leave, benefits, fees, or deductions	5.6%	3.7%	3.4%	
Ineffectively communicated employment information				
Employment documentation was not communicated in the worker's native language or changes in terms of employment were not declared or were not negotiated	2.8%	2.4%	5.4%	
Mandatory overtime				
Workers were not provided sufficient notice of overtime in advance or were unable to refuse overtime without penalty, against international standards	2.7%	1.6%	1.9%	
Worker-paid recruitment fees				
Fees related to recruiting and hiring were not disclosed in advance or not reimbursed	1.2%	<1%	2.1%	
Control of documents				
Employers maintain possession or control over worker identity documents	<1%	<1%	<1%	

# **Amazon's core remediation principle:** Workers should be at the center of any remediation effort. We put the safety and interests of affected workers first.

As explained further below, while we are conscious that audits are not the answer to all potential modern slavery risks, audits are one of the tools that help us determine where to focus our efforts and resources. We rely on our audit processes to provide us with important information about our responsible sourcing program so we can respond to the needs of workers making products that are Amazon-branded. These insights help us tailor our programs and identify strategic partnerships, build supplier capacity, and address and prevent these issues.

Audits also help us detect an issue before we engage with suppliers or during our relationship with them so that we can work with suppliers to remedy the issue. When we identify a gap between a supplier's practices and our Supply Chain Standards, we track remediation and conduct follow-up assessments as needed. Between assessments, our central team directly engages with suppliers to discuss open issues and remediation progress, and provides them with issue-specific remediation guidebooks. Assessment findings are flagged as high, medium, or low depending on severity. When high- and medium- level issues are identified, we take steps to verify that suppliers have made meaningful

progress toward remediation. Failure to implement the actions listed in the corrective action plan may prevent the supplier from continuing production or providing services or labor to Amazon. For low-level issues, we monitor suppliers for continuous improvement through maintenance audits. For remediation plans, we expect suppliers to act within an agreed-upon timeline, remove harm, act in the best interests of workers, and commit to preventing similar issues in the future.

We operate with an approach based on continuous improvement, meaning we work with suppliers to embed respect for human rights in their operations and supply chain, to improve their practices to protect workers, and improve working conditions. When issues are identified, remediation can also be a challenge. For example, working with our suppliers to remediate worker-paid recruitment fees is particularly challenging in countries where payment of recruitment fees is a part of accepted business practice or an accepted part of government programs. If we terminate business with a supplier, we remove the incentive for the supplier to improve. which can have a detrimental effect on workers and the community. However, because improvement is not always possible, we reserve the right to

<sup>10</sup> Audits are conducted for suppliers who manufacture products that are Amazon-branded and who provide services (e.g., staffing agencies, janitorial companies) or not-for-resale goods in our operations.



terminate a relationship at any time for failure to meet our Supply Chain Standards.

#### Responding to Violations of our Supply Chain Standards in Saudi Arabia

In 2023, Amazon found violations of our Supply Chain Standards at a third-party licensed temporary labor agency ("third-party vendor") in Saudi Arabia through an independent audit. The violations ranged from recruitment fees paid by migrant workers to the absence of grievance mechanisms and issues with worker accommodations. External organizations raised similar concerns and shared information with us about these and other human rights risks collected during interviews with former employees of this third-party vendor.

In response, we conducted a deeper dive into practices of our third-party vendors throughout Saudi Arabia and developed a series of short- and long-term measures to remedy immediate issues and prevent future recurrence. We involved two independent third parties to assist with our investigation and engaged directly with contracted workers through interviews and other means to help establish reimbursement amounts and manage repayment. As of February 2024, we have reimbursed more than 700 workers across all our third-party licensed temporary labor agencies in Saudi Arabia, totaling more than \$1.9 million USD in reimbursed recruitment fees and related costs. Through audits, we also verified that the third-party vendor remediated the most serious concerns about worker housing. We also secured the vendor's commitment that after its employees cease working at Amazon, it will pay its employees in line with their contracts and will not move them to a new accommodation site that fails to meet Amazon's standards. This vendor also established a more robust system to enable workers to anonymously raise grievances.

We also adopted enhanced controls to reduce the risk of recurrence. Among other measures related to third-party licensed temporary labor agencies in Saudi Arabia, we strengthened contracts to clarify expectations regarding compliance with our Supply Chain Standards; reviewed wage policies, including clarification that illegal wage deductions are prohibited; provided additional training to vendors in the region on how to implement our Supply Chain Standards, including responsible recruitment practices; and improved our communication mechanism that enables contracted workers to share concerns directly with Amazon's management. Learn more about our response here.

We track the results of our audits and remediation measures to assess their effectiveness, and continue to update our due diligence mechanisms to drive lasting change focused on benefiting workers in our supply chain. We are actively pursuing new mechanisms, technology solutions, and pilot programs to enhance our ability to proactively identify and mitigate risks, and positively impact the well-being of workers. We also know we cannot address many of these complex issues alone; systemic issues contributing to modern slavery risks will require broader collaboration between governments, international organizations, the private sector, and civil society. We develop materials and sponsor workshops to empower suppliers to strengthen their own management systems and contribute to industry association and multi-stakeholder initiatives working to address systemic issues.

We continue to deepen our due diligence beyond our direct suppliers. Commodity supply chains are complicated and fragmented, and improved visibility into raw material supply chains better enables businesses to identify human rights and labor rights violations and hold suppliers accountable.

#### **Responsible Mineral Sourcing**

According to our Supply Chain Standards, Amazon suppliers should source commodities used in products in a way that respects local communities and protects ecosystems. Suppliers should consistently monitor the social and environmental performance of their upstream suppliers in line with recognized due diligence frameworks.

We recognize certain mineral supply chains are at higher risk of modern slavery. We conduct due diligence on high-risk minerals, including tin, tungsten, tantalum, gold, and cobalt, through our responsible minerals program. While Amazon does not engage in direct sourcing from mine sites and smelters, we are committed to avoiding the use of minerals that have fueled conflict. We encourage our suppliers to support our effort to identify the origin of designated minerals used in our products consistent with recognized due diligence frameworks and source from smelters and refiners that have successfully completed a recognized third-party responsible minerals audit. Our process for mapping and addressing our risks related to mineral sourcing can be found in our most recent Conflict Minerals Report filed with the United States Securities and Exchange Commission.

We engage suppliers on the importance of responsible mineral sourcing mechanisms and industry collaboration. We are members of the



For more information on our responsible sourcing practices, please see our 2023 <u>Sustainability</u> Report.

To help promote better standards for cotton more widely, Amazon sponsors and participates in the Responsible Sourcing Network initiative YESS™: Yarn Ethically & Sustainably Sourced. YESS supports fabric and spinning mills in implementing a risk-based due diligence approach for cotton sourcing, and promotes collaboration with the goal of preventing, mitigating, and remediating forced labor in cotton production. In 2023, YESS launched its program to assess fabric and spinning mills in India and Pakistan. Amazon is supporting YESS's efforts to scale and to expand the program to Vietnam and Bangladesh.

We continue to expand our responsible recruitment interventions. Amazon is committed to addressing deceptive recruitment practices and payment of recruitment fees, which can be indicators of modern slavery. Our responsible recruitment interventions aim at gaining greater visibility into supplier and employment agency recruitment practices, and at reducing the risk of forced labor in Amazon's supply chain.

Through increased due diligence and new strategic partnerships, we have deepened our understanding of recruitment practices in different regions and industries. This work highlighted root causes of risks, particularly in origin and destination countries for foreign migrant workers. Charging workers recruitment fees is not permitted under Amazon's Supply Chain Standards. Where fees were found to have been charged, we support our suppliers to understand ethical recruitment practices, create and implement remediation plans to reimburse workers (in full and in a manner that protects workers and their families from harm and retaliation), and build effective responsible recruitment systems to prevent recruitment fees from being charged to workers at any point in the hiring process.

Our responsible recruitment initiatives are structured around six core area: awareness raising; specialized training; case management support; risk assessment and mitigation toolkits; transparent data, analysis, and reporting; and partnerships.

We offer suppliers on-site and remote support to

help them understand Amazon requirements, effectively navigate the corrective action plan process, and design and implement sustainable management systems to encourage supplier monitoring throughout their supply chain. We support our suppliers' efforts to establish data collection mechanisms, which facilitate the monitoring of progress and enable timely responses to emerging risks.

We offer suppliers comprehensive risk assessment and mitigation toolkits to identify potential issues before these are surfaced during audits and allowing us to engage suppliers in a remediation process from the outset. In 2023, we launched a responsible recruitment performance evaluation survey, consisting of a list of targeted questions to gather information on risks, controls, and recruitment agencies. Where issues are identified, we offer suppliers dedicated case management support, which includes providing remediation guidebooks. For example, our recruitment fee remediation guidebook, updated in 2023, provides suppliers with guidance on implementing a zero worker-paid recruitment fee policy, calculating fee repayment, creating effective reimbursement plans, and engaging responsible labor agents. The guidebook also includes sample language for terms of employment for clear communication between suppliers and workers. Additionally, in 2023, we introduced a guidebook to assist suppliers in preventing and remediating the retention of identity documents. We believe providing suppliers with the right data, strategies, and tools helps them detect and address risks in their supply chains effectively.

We encourage suppliers to participate in external training programs, such as industry association tutorials to recognize and prevent modern slavery and implement high-quality management systems. We also provide suppliers with responsible recruitment training. In 2023, we extended our responsible recruitment training to our logistics and services providers and expanded offerings in additional countries that are common destinations for foreign migrant workers. Working with the Issara Institute, Microbenefits, the Mekong Club, and Verité, we offered supplier training sessions on modern slavery risks and responsible recruitment practices in Malaysia, Saudi Arabia, Singapore, Taiwan, Thailand, and the United Arab Emirates. These sessions focused on topics including implementing effective risk mitigation controls, identifying issues in recruitment and hiring processes for migrant workers, and establishing strong management systems to address and prevent these issues.

Human rights risks are systemic in nature; the key to addressing them is cross-industry engagement and collaboration. We engage with strategic partners



#### ...with our selling partners

We include our Supply Chain Standards as part of our business relationship with selling partners. 11 Selling partners registering for or using a service (including Selling on Amazon, Fulfillment by Amazon, Amazon Advertising, Transaction Processing Services, and the Selling Partner API) agree to the terms of the Amazon Services Business Solutions Agreement, which incorporates Amazon's Supply Chain Standards.

We evaluate credible allegations of selling partner violations of our Supply Chain Standards. If we have reason to suspect products do not meet our Standards, we may request evidence of due diligence from selling partners to demonstrate products were manufactured in accordance with our Standards. We reserve the right to remove products that do not meet our Standards from our stores.

#### ...in our operations

We offer various ways for our employees to share grievances and raise concerns. Amazon offers a variety of communication mechanisms for employees, including an externally managed Ethics Line. In addition, MyVoice, Amazon's primary Voice of Associate platform, provides a two-way communication channel between our global associates and their site leadership. The online tool allows employees to express concerns, offer suggestions, and ask questions to leadership teams who reply directly, enabling quicker, more collaborative issue remediation. For more information on these systems, please see the "Code of Business Conduct and Ethics" section and our 2023 Sustainability Report.

In the Middle East, North Africa, Mexico, the UK, and the U.S., we conducted focus groups with contract workers within our global operations to understand their familiarity with grievance mechanisms, whether they are able to access them, and what barriers they may face to using them.

For all individuals, including members of the public, employees, and workers in our supply chain, we introduced a new way to notify us about potential human rights and environmental concerns - a web form where people can anonymously report cases directly to Amazon. The form is available in 19 languages and dialects and can be accessed globally.

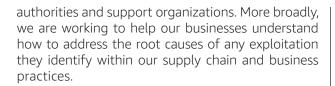
We provide a modern slavery training program to our own employees, suppliers, and transportation associates. As a global company employing over a million workers around the world, we recognize the responsibility and opportunity we have to raise awareness among our employees and collaborators on human rights issues. In 2023, we updated our modern slavery training, available to employees in seven languages and customized by region. This training builds awareness on how to recognize indicators of modern slavery in the workplace and report concerns to appropriate authorities. We are also a corporate sponsor of Truckers Against Trafficking, which stands committed to educate, equip, empower, and mobilize members of the trucking, bus, and energy industries to address human trafficking. We include Truckers Against Trafficking modules in our training for internal fleet drivers to help them identify and respond to potential human trafficking victims; training 9,970 Amazon transportation associates in 2023.

We are working to constantly improve our approach to combating child labor. Amazon is committed to ensuring our products and services are provided in a way that respects human rights, and combating child labor in global supply chains is an important part of that pledge. We are a member of the Child Rights in Business Working Group founded by The Centre for Child Rights in Business and committed to support the Joint Action Pledge in 2021 to strengthen the protection of children's rights and accelerate actions to address child labor in global supply chains. In 2023, Amazon worked with The Centre to deliver an online training on child labor prevention and remediation and young worker management, to our central human rights team and key internal stakeholders.

We are leveraging technology to enhance our internal programs. In 2023, we launched a new initiative to identify and proactively address forced labor and modern slavery risk indicators across our business. The program brings together employees from our human rights, eCommerce, and fraud teams to identify and eliminate instances of exploitation—with a focus on victim safety.

Working with both internal and external experts in human trafficking, the cross-functional team is establishing clear protocols, mandatory training, and policies on identifying potential victims of forced labor or modern slavery within our business operations, as well as detailing what employees should do if they observe any indicators of human trafficking. These include guidance on ensuring victim safety, providing immediate support and assistance to them, as well as involving relevant

<sup>11</sup> Selling partners are vendors and third-party sellers that sell or supply products and services in Amazon's stores.



#### ...with AWS

Our customers use AWS technology to combat modern slavery. Throughout 2023, we continued to partner closely with Thorn, a non-profit that builds technology to combat child sexual abuse at scale. Amazon provides millions of dollars in AWS credits for Thorn to power its tools. Thorn leverages a variety of AWS solutions to support Safer, a solution that uses advanced AI and machine learning models to detect child sexual abuse material (CSAM) at scale. Safer helps companies identify, review, and report CSAM from content-hosting platforms. In 2023, Safer helped companies detect over 3.8 million CSAM files. We make Thorn's Safer technology available to businesses via the Amazon Web Services (AWS) Marketplace so they can proactively identify and address CSAM.

In the U.S., Amazon collaborates with the National Center for Missing and Exploited Children (NCMEC), a child protection organization committed to aiding the search for missing children, reducing child sexual exploitation, and preventing child victimization. NCMEC utilizes AWS technology and services to support the infrastructure of several programs. Amazon's subsidiary Ring works with NCMEC to distribute geo-targeted missing child posters visible in the Ring Neighbors app and across social media. NCMEC's Missing Child posters encourage users to contact proper law enforcement or NCMEC if they have information that could aid in the search for a missing child. Amazon serves on NCMEC's Board of Directors and in 2023 provided hundreds of thousands of dollars in AWS credits to reliably support mission-critical applications that assist NCMEC's mission of making sure that every child has a safe childhood.

Amazon supports Polaris, a non-profit and AWS customer that leads a survivor-centered, justice- and equity-driven movement to end human trafficking in the U.S. AWS provides financial and technical support to enhance Polaris's data collection and operations and improve trafficking identification and prevention. Since 2007, Polaris has identified over 82,300 situations of human trafficking.

#### ...with other organizations

Amazon collaborates with NGOs, governments, and other companies to reduce and disrupt modern slavery. Amazon is a member of the steering committee for Tech Against Trafficking (TAT), a coalition of companies and global experts working

to eradicate human trafficking using technology. Building on the success of the inaugural TAT Summit, which was hosted in 2022, the 2023 Summit, titled "Leveraging Technology to Eradicate Forced Labor", brought together over 140 global anti-trafficking leaders, including businesses, civil society, academia, government, and survivors with lived experience. Panelists and experts explored how technology can eradicate forced labor and labor trafficking and how companies like Amazon can prevent the misuse of technology to facilitate these crimes. In 2023, we worked with Polaris and the Issara Institute—both participants of the TAT Accelerator—to scale their technology solutions to address human trafficking.

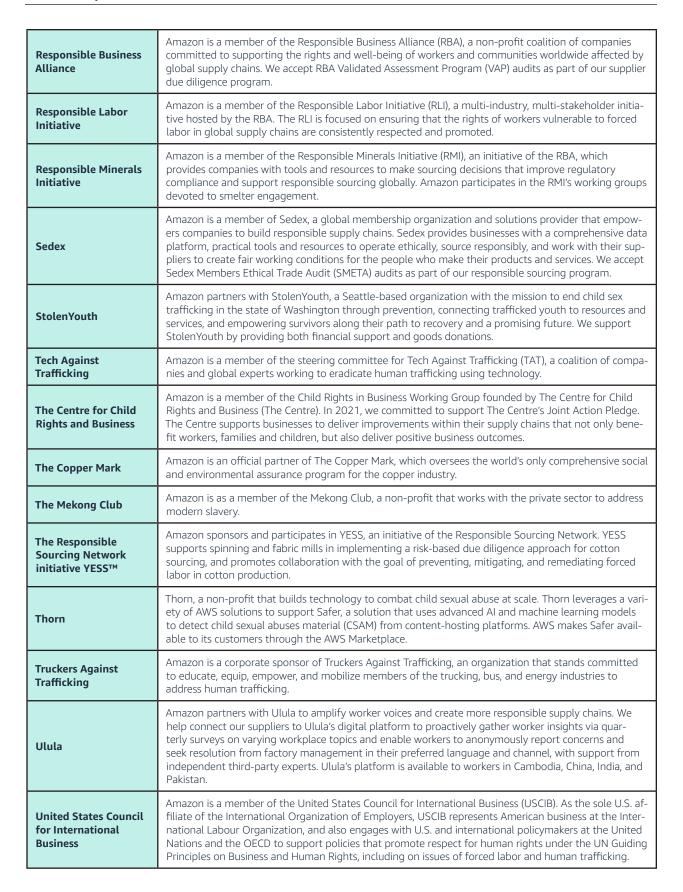
Amazon is increasing partnerships with key multi-stakeholder initiatives. In 2023, we expanded our relationships and work with key external partners that help us advance our work on modern slavery. We joined the Mekong Club, a non-profit that works with the private sector to address modern slavery. Through the organization, we developed a supplier-facing remediation guide and trained vendors in Saudi Arabia and the United Arab Emirates on responsible recruitment practices. We also continued our work with the Indirect Spend Alliance (ISA), an industry working group that aims to identify operational areas of shared human rights risk in procurement and design a single industry approach to addressing hotspots. We collaborate with Better Work's regional teams and participate in the Buyers Forum and Business for Social Responsibility's (BSR) Human Rights Working Group to share knowledge and learnings about our human rights issues and discuss how to address them through collective action. Efforts like these are vital to understanding hotspots across our supply chain and developing impactful risk mitigation strategies that put the interests of workers first.

We are collaborating with the International Organization for Migration (IOM). In 2023, Amazon and IOM partnered to collaborate on Promoting the Respect of Human and Labor Rights of Migrant Workers in Global Supply Chains. Through this strategic collaboration, we will work together to advance our suppliers' and business partners' respect of migrant workers' rights and improve safe labor migration and socio-economic inclusion. Amazon and IOM will focus on human rights due diligence, mapping labor migration processes across relevant corridors, capacity building of supply chain partners in countries of origin and destination, and engaging in multi-stakeholder initiatives to drive positive change across relevant industries.



We engage with industry and multi-stakeholder organizations around the world to continually improve our efforts to address modern slavery. We also establish strategic partnerships with organizations on the ground in areas where we operate to aid their efforts in directly supporting potential victims.

Amader Kotha	Amazon partners with the Amader Kotha Helpline to provide workers in the ready-made garment sector in Bangladesh with a platform to voice their concerns related to labor, safety, and other issues. Through the helpline, Amazon gains direct feedback from workers in our supply chain to help us improve working conditions.
amfori	Amazon works with amfori, a leading global business association for open and sustainable trade. amfori brings together over 2,500 retailers, importers, brands, and associations from over 40 countries to drive social performance and improvements across global supply chains. We accept Business Social Compliance Initiative (amfori BSCI) audits as part of our supplier due diligence program.
Better Buying	Amazon partners with Better Buying Institute, a leading global initiative committed to leveraging supplier data to help drive lasting improvements in global supply chains. Better Buying's cloud-based platform enables suppliers to anonymously rate the purchasing practices of their buyers, and identify which practices the buyer needs to improve. Brands and retailers can then use these data-driven insights to partner with their suppliers to continuously improve, to measure progress year over year, and achieve mutually beneficial sustainability outcomes.
Better Work	We require Amazon-branded suppliers in a number of regions to enroll in Better Work - a partnership between the International Labor Organization and the International Finance Corporation, a member of the World Bank Group. Better Work focuses on improving working conditions, empowering and recognizing workers' rights, and making the global garment sector more competitive, resilient, and inclusive. By working directly with factories and workers and their representatives, Better Work supports greater compliance with national labor laws and international labor standards through factory assessments and training, as well as advocacy and research that changes policies, attitudes, and behaviors.
Business for Social Responsibility	Amazon is a member of Business for Social Responsibility (BSR), a sustainable business network and consultancy focused on creating a world in which all people can thrive on a healthy planet. We participate in various BSR collaborative initiatives, including Tech Against Trafficking, Global Business Coalition Against Trafficking (GBCAT), and the Human Rights Working Group.
Cascale	Amazon is a member of Cascale, a global non-profit alliance catalyzing collective action toward equitable and restorative business practices in the consumer goods industry. Spanning 300 retailers, brands, manufacturers, governments, academics, industry associations, and non-profits worldwide, Cascale is united by a singular vision to give back more than it takes for people and the planet.
International Organization for Migration	Amazon and the International Labour Organization (IOM) – the leading organization within the United Nations system promoting humane and orderly migration for the benefit of all – collaborate on Promoting the Respect of Human and Labour Rights of Migrant Workers in Global Supply Chains.
Indirect Spend Alliance	Amazon is part of the Indirect Spend Alliance, an industry working group that aims to identify operational areas of shared human rights risk in procurement and design a single industry approach to address hotspots.
Issara Institute	Issara Institute is an independent non-profit organization based in Asia tackling issues of human trafficking and forced labor through worker voice, partnership, and innovation. Through Issara's Strategic Partners Program, Amazon is advancing our support and commitments to workers, suppliers, and recruitment agencies in our own supply chain and the broader ecosystem.
National Center for Missing and Exploited Children	The National Center for Missing and Exploited Children (NCMEC) is a child protection organization committed to aiding the search for missing children, reducing child sexual exploitation, and preventing child victimization. Amazon serves on NCMEC's Board of Directors.
Polaris	Amazon supports Polaris, a non-profit and AWS customer that leads a survivor-centered, justice- and equity-driven justice movement to end human trafficking in the U.S. AWS provides financial and technical support to enhance Polaris's data collection and operations and improve trafficking identification and prevention.
Public-Private Alli- ance for the Responsi- ble Minerals Trade	Amazon joined the Public-Private Alliance for the Responsible Minerals Trade (PPA) in 2020 and serves on the PPA's Governance Committee. The PPA is a multi-stakeholder working to promote ethically and economically sound minerals supply chains, due diligence systems, and local governance systems that uphold human rights and labor rights, support environmental responsibility, eliminate links to armed conflict and corruption, and maximize benefits to the communities where minerals are produced.



# **Looking to the Years Ahead**

We are proud of the progress we have made to further respect and advance human rights throughout our business, including actions to prevent and address modern slavery risks. As our program grows, we look forward to scaling our ongoing initiatives and priorities and further engaging in company-wide efforts to address risks posed by modern slavery. Looking to the years ahead, we will continue to strengthen our commitments under these key pillars:

- Regularly review and update our policies and assessment processes
- Grow out partnerships with organizations that are combating modern slavery
- Expand out training and capacity-building efforts
- Regularly review and improve our supply chain due diligence efforts



# **Approval and Signature**

Amazon's global policies, practices, and procedures to assess and address the risk of modern slavery are implemented with attention to the local contexts and specific regional needs, and in consultation with each of the reporting entities and the entities they own and control. Consultation on Amazon's approach to modern slavery is led by Amazon's central team, which has visibility over and responsibility for assessing and providing Amazon businesses with the tools to address modern slavery risks in our global operations and supply chains.

Amazon's central team works closely and on an ongoing basis with Amazon entities worldwide to identify risks, and implement and monitor our approach to modern slavery.

This annual statement has been prepared by Amazon's subject matter experts responsible for supporting Amazon's efforts to address human rights risks in our operations and supply chains. As part of the development of this statement, key functions worldwide, including in the entities and jurisdictions covered by regulatory requirements, were actively engaged and consulted. A collaborative approach was taken, reporting requirements were discussed, and relevant materials and updates were presented on an ongoing basis.

The statement was reviewed by cross-functional stakeholders including representatives and leaders from our global and local legal, public policy, sustainability, and supply chain teams, and directors from each reporting entity.

This statement was approved by the Amazon European Board of Directors and covers all activities undertaken by Amazon's U.K. entities.

Amazon EU SARL, U.K. Branch

John Boumphrey,
UK Country Manager, 2024

This statement was approved by Amazon Commercial Services Pty Ltd and covers all activities undertaken by Amazon's Australian entities.

Amazon Commercial Services Pty Ltd

Janet Menzies, AU Country Manager, 2024 In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Matt Busbridge, Director, 29 May 2024

Matt Busbridge

I have the authority to bind Amazon.com.ca ULC.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Jesse Dougherty, Director, 28 May 2024

Jesse Dougherty
I have the authority to bind Amazon Development Centre
Canada ULC.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Jasmin Begagic, Director, 28 May 2024

Jasmin Begagic

Thave the authority to bind Amazon Canada Fulfillment Services, ULC.