

Modern Slavery Statement

Amazon



This statement addresses the period from January 1, 2021¹ to December 31, 2021, in compliance with the requirements of the United Kingdom Modern Slavery Act, the Australia Modern Slavery Act, and the California Transparency in Supply Chains Act.²



Contents

| | |
|---|-----------|
| 1. Introduction | 1 |
| 2. Our Business | 2 |
| 3. Our Policies | 3 |
| Global Human Rights Principles | 3 |
| Code of Business Conduct and Ethics | 3 |
| Supply Chain Standards | 3 |
| 4. Governance | 5 |
| 5. Assessing Our Risk | 6 |
| Vulnerable Groups | 6 |
| Region-Specific Risk | 6 |
| Our Supply Chain | 6 |
| 6. Responsible Sourcing of Amazon-Branded Products | 7 |
| Supplier Due Diligence | 7 |
| Responsible Minerals Sourcing | 9 |
| 7. Our progress | 10 |
| ...with our suppliers of Amazon-branded products | 10 |
| ...with our operations | 12 |
| ...with our Selling Partners | 12 |
| ...with AWS | 13 |
| ...with other organizations | 13 |
| 8. Modern Slavery in the Context of COVID-19 | 14 |
| 9. Engagement with Strategic Stakeholders | 15 |
| 10. Our Commitments and Progress | 18 |
| 11. Approval & Signature | 19 |

1 Metrics contained herein cover 2021 activities, unless otherwise indicated.

2 This statement excludes any entity that elects to report independently.



1. Introduction

Modern slavery is one of the most complex and important human rights challenges of our time. According to the International Labour Organization (ILO), the term modern slavery covers a set of legal concepts, including forced labor, debt bondage, and human trafficking. It is an umbrella term to refer to situations of exploitation that an individual cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power.³ According to a 2017 ILO report,⁴ at any given time there are more than 40 million people in situations of modern slavery worldwide, nearly 25 million of whom are trapped in forced labor, a condition that violates the human right to freely chosen employment. The devastating health and economic crisis caused by the COVID-19 pandemic increases the risk of modern slavery and other forms of exploitation for many people and communities. The COVID-19 crisis exacerbates underlying factors that can make people vulnerable to modern slavery, including poverty, financial insecurity, lack of mobility caused by local or national shutdowns, and supply chain and logistics challenges due to changes in demand.

Amazon does not tolerate modern slavery. It will take commitment, resources and innovative solutions from governments, international organizations, the private sector, and civil society to prevent modern slavery from impacting so many. 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 any modern slavery risks that may arise in the course of our business.

In 2021, we advanced our work on human rights impact assessments (HRIAs). Amazon conducted its first HRIA in 2020—a key milestone in our human rights due diligence efforts—on the raw and recovered materials supply chain for Amazon-branded digital devices. In 2021, we began implementing recommendations from the HRIA, such as increasing our support for industry collaboration on responsible mineral sourcing, and building the capacity of our supply chain partners to effectively manage human rights risks.

We enhanced our partnerships with industry associations and non-profit organizations in 2021, to develop best practices in addressing risks of modern slavery. This statement assesses our risk, outlines our efforts, and sets commitments for the coming year.

³ "Global Estimates of Modern Slavery," The International Labour Office, Walk Free Foundation, and International Organization for Migration, page 16, https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/documents/publication/wcms_575479.pdf. The respective laws that guide this statement also have references to relevant definitions and statutes related to modern slavery.

⁴ Ibid, page 9.



2. Our Business

Amazon strives to be Earth's Most Customer-Centric Company, Earth's Best Employer, and Earth's Safest Place to Work. As of December 31, 2021, Amazon employed approximately 1.6 million full- and part-time workers across the globe. In each of our segments we serve our primary customer sets, consisting of consumers, sellers, developers, enterprises, and content creators. In addition, we provide services, such as advertising to sellers, vendors, publishers, authors, and others, through programs such as sponsored ads, display, and video advertising. We have organized our operations into three segments: North America, International, and Amazon Web Services (AWS).

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 physically visiting our stores. We also manufacture and sell electronic devices, including Kindle, Fire tablet, Fire TV, Echo, Ring home security products, and other devices, and we develop and produce media content. In addition, we offer Amazon Prime, a membership program that includes unlimited free shipping and other benefits. We fulfill customer orders in a number of ways, including through: North America and International fulfillment and delivery 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 through co-sourced arrangements. We offer programs that enable sellers to grow their businesses, sell their products in our stores, and fulfill orders through us. We are not the seller of record in these sellers' transactions. We earn fixed fees, a percentage of sales, per-unit activity fees, interest, or some combination thereof, for our seller programs.

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

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 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 [**Sustainability Report**](#), [**Annual Report**](#) and our latest [**Proxy Statement**](#).



3. Our Policies

Through our policies we communicate our values and expectations, setting a high bar for ourselves, our suppliers, and our selling partners, and making clear that we do not tolerate modern slavery. We are committed to consistently evolving and improving our approach.

Global Human Rights Principles

Our **Global Human Rights Principles** demonstrate our commitment to respecting human rights and the dignity of people connected to our business around the world. We strive to ensure the products and services we provide are produced in a way that respects internationally recognized human rights, including the right to freely chosen employment. 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. Our commitment and approach 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, the UN Universal Declaration of Human Rights, the Core Conventions of the ILO, and the ILO Declaration on Fundamental Principles and Rights at Work. We regularly review our policies to identify areas for update and improvement, engaging external stakeholders and benchmarking against international human rights standards and evolving industry norms.

⁵ The Audit Committee oversees management of risks related to our financial statements and financial reporting process; data privacy and security; business continuity; operational risks; the qualifications, independence, and performance of our independent auditors; the performance of our internal audit function; legal and regulatory matters; and our compliance policies and procedures.

Code of Business Conduct and Ethics

We are committed to conducting our business in a lawful and ethical manner. Our **Code of Business Conduct and Ethics** (Code) sets out guiding principles on professional conduct and establishes that in performing their job duties, Amazon employees should always act lawfully, ethically, and in the best interests of Amazon. All Amazon employees take mandatory compliance training courses on the Code, Anti-Bribery Compliance, and Workplace Harassment. Employees may raise questions or report suspected violations of our Code through Amazon's Ethics Line, by phone or online. Employees have made reports from 63 countries in over 30 languages of the 165 languages available to them. Reports to the Ethics Line are answered by an independent third party and may be made anonymously upon request. Our Business Conduct and Ethics team records, reviews, and directs for investigation calls for potential violations of the Code, and tracks cases through to remediation where necessary. The Audit Committee⁵ receives and reviews certain reports on complaints, allegations, and incidents reported pursuant to the Code.

Supply Chain Standards

Amazon's **Supply Chain Standards** detail the requirements and expectations for our suppliers, their supply chains, and selling partners who list products in our stores. We expect our suppliers to follow all applicable legal requirements, and consistently monitor and enforce our Supply Chain Standards in their own operations and supply chain. Amazon's Supply Chain Standards are grounded in principles of inclusivity, continuous improvement, and supply chain accountability. We engage with suppliers that are committed to these same principles; suppliers commit to these standards as a condition of doing business with us. At least every three years in line with industry best practices, we review our Supply Chain Standards against policies developed by industry associations and in consultation with stakeholders.



Selling Partners,⁶ suppliers, and goods and services providers for Amazon's operations are subject to these standards as a condition of doing business with us. We expect that all products and services provided to Amazon or sold in Amazon stores are manufactured or produced in accordance with our Supply Chain Standards.

Our Supply Chain Standards include requirements for suppliers to put preventative measures in place to protect workers at risk of modern slavery. They 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. Suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of work. Suppliers must provide workers with documentation clearly stating the terms of employment in a language the worker can understand. Our Supply Chain Standards reflect domestic and foreign migrant workers' unique vulnerability to situations of modern slavery and make clear that workers may not be charged recruitment 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.

⁶ Selling Partners are third-party sellers (sellers) and retail vendors who offer products for sale in Amazon's stores.



4. Governance

We are committed to embedding human rights considerations into decision-making across our company and into our policy and governance framework. Amazon's Board of Directors is responsible for the control and direction of Amazon and regularly reviews reports on various aspects of our business, including related risks and the strategies for addressing them. While the entire Board has overall responsibility for risk oversight, the Board has delegated responsibility for certain risks to its committees. Among other duties and responsibilities, the Nominating and Corporate Governance Committee oversees Amazon's environmental, social, and corporate governance policies and initiatives. This includes policies and initiatives related to corporate social responsibility, including human rights and ethical business practices, and related risks most relevant to Amazon's operations and engagement with customers, suppliers, and communities. Among other duties and responsibilities, the Leadership Development and Compensation Committee oversees Amazon's strategies and policies related to human capital management, including diversity and inclusion, workplace environment and safety, and corporate culture. The Committees regularly meet with management and review these matters.



5. Assessing Our Risk

Understanding our modern slavery risk is critical to targeting our actions and partnerships to prevent and address the issue. We analyze risk in our business by engaging in research, mapping our supply chain against existing human rights indices, analyzing internally-conducted and industry audit results, and partnering with key stakeholders.

We have worked with sustainability and human rights consulting firms to identify salient human rights risks across our business. In conducting these assessments, we consulted a diverse group of external human rights experts and incorporated their feedback into the results. We benchmarked the results against internationally recognized human rights standards. This assessment identified a set of priority human rights values and key salient human rights risks for Amazon, including modern slavery/forced labor.

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 be found among any population, we recognize certain groups are particularly vulnerable, including:

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

Region-Specific Risk

While modern slavery can be found in all countries, we take in to account region-specific risks associated with 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. Based on globally accepted

risk indices related to forced labor and migration—US Department of Labor (DoL), ILO, UNICEF, and the Global Slavery Index—and review of our supply chain footprint, we understand that countries in our supply chain may present higher risks for modern slavery, requiring additional due diligence, partnership, and collaboration.

Our Supply Chain

We understand that our manufacturing supply chain presents a strong need for focused efforts to assess and address modern slavery risk. We routinely evaluate our supply chain to understand the highest risks to workers and prioritize our efforts. We evaluate these risks using our teams of experts; internal and external data; worker interview feedback; and guidance and partnerships with external stakeholders, including industry experts, civil society groups, and non-governmental organizations.

Our relationships with our suppliers and monitoring of their practices for modern slavery indicators also allow us to better understand our modern slavery risks. 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, debt bondage indicators such as charging recruitment fees, and mandatory overtime. This data informs our efforts to respond to those risks.

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



6. Responsible Sourcing of Amazon-Branded Products

Transparency is an important tool to help us assess, prioritize, and address risks in our supply chain and identify opportunities for collaboration on systemic supply chain issues. We publish an interactive [supply chain map](#) that provides details on suppliers of Amazon-branded apparel, consumer electronics, food and beverage, and home goods products. We provide data from supplier assessments annually in our Sustainability Report, including year-over-year data on high and medium level issues in our supply chain and actions to address our salient human rights risks.

Our global teams work closely with suppliers of Amazon-branded products to communicate our standards and help build their capacity to provide working environments that are safe, respectful of human rights, and free of modern slavery. Our Responsible Sourcing Program works to reduce risks and help ensure the rights of workers, especially those considered to be in a vulnerable population or who work in countries associated with a higher modern slavery risk.

Supplier Due Diligence

We engage in robust due diligence of suppliers of Amazon-branded products. We recognize the challenges suppliers face when working to meet our Supply Chain Standards and work closely with them to help ensure best practices. We prioritize mechanisms that drive continuous improvement and are committed to working with our suppliers to remedy identified issues and put systems in place to prevent issues in the future. Our [Supplier Manual](#) provides an overview of our due diligence processes.

We use independent auditors to assess potential or current suppliers for modern slavery indicators. To do this, auditors conduct regular on-site inspections and confidential worker interviews. When a specific audit finding requires a more hands-on approach, we also send Amazon teams or third-party experts to conduct further assessments. Our audits look for supplier findings based on indicators, including those associated with modern slavery. When an employer does not communicate the full terms of employment, does not give clear documentation defining those terms to a worker in the worker's own language, does not give required notice of overtime, collects recruitment fees that can lead to debt bondage, or takes a worker's identification document, these may be signs of modern slavery.

**Table 1: 2019, 2020, and 2021 Related Audit Findings**

The following data reflect findings from current and past suppliers Amazon evaluated but decided not to do business with for a variety of reasons, including when supplier assessments demonstrated that the supplier did not adhere to our Supply Chain Standards. A single assessment may include more than one issue. We accept assessments completed by qualified independent audit firms based on our own assessment standards and those of industry associations, including the Sedex (SMETA), amfori (amfori BSCI), and the Responsible Business Alliance; the certification standard Social Accountability International (SA8000); and the Better Work program.

| Related Findings | % of audits where issue was found | | |
|--|-----------------------------------|--------|----------------|
| | 2019 | 2020 | 2021 |
| Incomplete employment information Employment documentation did not include relevant information on the nature of work, working hours, wages, leave, benefits, fees, or deductions | 9.95% | 10.13% | 5.6% |
| 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 | 2.79% | 4.27% | 2.8% |
| Mandatory overtime Workers were not provided sufficient notice of overtime in advance or were unable to refuse overtime without penalty, against international standards | 1.94% | 6.71% | 2.7% |
| Worker-paid recruitment fees Fees related to recruiting and hiring were not disclosed in advance or not reimbursed | 1.76% | < 1% | 1.2% |
| Control of documents Employers maintain possession or control over worker identity documents | 1.25% | < 1% | < 1% |

Our assessment data helps us determine where to focus our efforts and resources, and provides insight into industry-wide challenges and systemic issues. We rely on our audit processes to provide us important information about our Responsible Sourcing Program so we can respond to the needs of workers making Amazon-branded products. These insights help us tailor our programs and identify strategic partnerships, highlighted in the "Our Progress" section below, build supplier capacity, and address and prevent these issues. Risk assessments 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. If audit findings require remediation, including those related to modern slavery, suppliers develop a corrective action plan

detailing actions to address those findings. We may conduct announced or unannounced on-site verifications or request additional documentation from suppliers. For example, in cases of worker-paid recruitment fees, we identify where workers migrated from and how they were recruited and if they paid any recruitment fees. 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 and implement plans to reimburse workers in full. We also expect suppliers to consistently monitor and enforce our standards in their own operations and supply chain, as well as make improvements to meet or exceed our expectations.



We operate with an approach based on continuous improvement, meaning we work with suppliers to improve their practices to protect workers and improve working conditions. If we terminate business with a supplier, we remove the incentive for the supplier to improve, which can have a detrimental effect on workers. However, because improvement is not always possible, we reserve the right to terminate our relationship with any supplier that violates our Supply Chain Standards, does not cooperate during assessments, refuses to change behaviors or practices, or does not make meaningful progress on remediation. Amazon will not enter into or continue a relationship with a supplier in particularly egregious cases where an audit results in a confirmed case of human trafficking, forced labor, employer destruction of employee personal papers, or restriction of movement that prevents workers from accessing basic liberties.

We also know that a single audit report will not surface every violation of our Supply Chain Standards. To respond to this challenge, we are actively pursuing new mechanisms, technology solutions, and pilot programs to better inform us of the critical information we need to make a difference in the lives of workers. 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.

We also know we cannot address many of these complex issues alone; they will require broader collaboration between governments, international organizations, the private sector, and civil society. As we discuss in the “Our Progress” section below, 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 update our due diligence mechanisms to drive lasting change focused on benefiting workers in our supply chain.

Responsible Minerals Sourcing

Amazon conducts due diligence on high-risk minerals through its Responsible Minerals Program. We recognize conflict minerals are often correlated with instances of modern slavery. While we do not engage in direct sourcing from mine sites and smelters, we are committed to avoiding the use of minerals that have fueled conflict. We expect suppliers to support our efforts to identify the origin of high-risk minerals, including tin, tungsten, tantalum, and gold (3TG), used in Amazon-branded products. Our process for mapping and addressing our risks related to minerals sourcing can be found in our most recent Conflict Minerals Report filed with the US Securities and Exchange Commission.



7. Our Progress

...with our suppliers of Amazon-branded products

In 2021, we strengthened our responsible recruitment program to gain greater visibility into supplier and employment agency recruitment practices. 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 and implement plans to reimburse workers in full.

We support our suppliers to meet our standards.

In 2021, we continued to offer suppliers on-site and remote training 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 partner with suppliers on particular areas of concern and 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 are continuously exploring ways to use Amazon's expertise to expand this support.

We developed responsible recruitment practices guidance for suppliers.

In 2021 we provided a guidebook to suppliers focused on migrant worker recruitment. The guidebook provides suppliers guidance on implementing a zero worker-paid recruitment fee policy, instructs suppliers on how to calculate fee repayment and create an effective reimbursement plan for workers who paid recruitment fees, and

provides strategies for engaging responsible labor agents.

The guidebook outlines certain provisions for suppliers to incorporate in their own policies, including:

- Workers' terms of employment must clearly indicate in each worker's native language: worker rights, responsibilities, and conditions of employment, including wages, benefits, working hours, location of the work, living conditions, housing and associated costs, work-related hazards, and other working and employment conditions.
- Foreign migrant workers must be provided with a copy of their employment terms in their native language at least five days prior to deployment from their home country. Workers with difficulty understanding the written terms must be provided a verbal explanation of the terms and conditions of their employment.
- The use of supplemental terms of employment or substitution of terms by the recruitment agent or employer to replace an original term with one less favorable to the worker is strictly prohibited.

The guidebook also provides suppliers with sample language for terms of employment, including terms that help ensure properly communicated, complete employment documentation between suppliers and workers. In 2021, the guidebook was shared with over 70 suppliers where recruitment fee issues were identified.

We provided suppliers with responsible recruitment training. In 2021, we partnered with the Responsible Business Alliance and the International Organization for Migration to offer training on responsible recruitment practices to over 50 suppliers and offered worker awareness training for sites in a high risk region to improve foreign migrant workers' livelihood. These training programs focused on modern slavery risks and the importance of responsible recruitment, including teaching participants how to implement effective risk mitigation controls, identify issues in



their recruitment and hiring processes for migrant workers, and draft an implementation plan for addressing these issues.

The UN designated 2021 International Year for the Elimination of Child Labour. Building on our partnership with Centre for Child Rights in Business, Amazon signed on to support the Joint Action Pledge to strengthen the protection of children's rights and accelerate action to address child labour in global supply chains.

Through this commitment, we will work to further extend due diligence, remediation and monitoring activities to increase understanding of child labor in supply chains, deliver programs to support juvenile workers, build capability of suppliers to address child labor, and work collaboratively as a group to share learnings, and establishing best practices to address child labor.

"Amazon is committed to ensuring our products and services are provided in a way that respects human rights, and combating forced and child labor in global supply chains is an important part of that pledge. In this International Year for the Elimination of Child Labour, we are proud to reinforce our commitment by joining the Joint Action Pledge and look forward to working collaboratively with the Centre for Child Rights and Business, peer companies, and other stakeholders to strengthen protections for children's rights and eliminate child labour."

**Leigh Anne DeWine, Director of
Social Responsibility**

We continue to deepen our due diligence beyond our direct suppliers.

In 2021 we continued to map deeper tiers of our Amazon-branded product supply chains to identify the most salient and material risks. 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.

In 2021, we continued to strengthen our efforts to address human rights risks in global cotton supply chains. Amazon joined Better Cotton's Retailer and Brand Advisory Panel on Traceability and participated in the Responsible Sourcing Network (RSN) initiative YESS: Yarn Ethically & Sustainably Sourced. YESS works to address forced labor in the cotton value chain by providing training to, and managing the assessment of, spinners and fabric mills to identify and address forced labor in cotton production.

In 2021, we increased our support for industry collaboration towards responsible mineral sourcing. We remain members of the Public-Private Alliance for the Responsible Minerals Trade (PPA) and the Responsible Minerals Initiative (RMI), and enhanced our cobalt due diligence program using the RMI's cobalt reporting template.

We also supported RMI's Smelter Audit Fund to increase assessments for tin, tungsten, tantalum, and gold smelters. These assessments are critical to responsible mineral sourcing in our supply chains. In 2022, we will implement additional smelter due diligence protocols as we work towards 100% of tin, tungsten, tantalum, and gold mineral smelters and refiners in our supply chain certified using a recognized minerals assurance program.



...with 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. For more information on these systems, please see our 2021 Sustainability Report.

We provide a modern slavery training program for our own employees. As a global retail and technology company employing over a million workers around the world, we recognize the responsibility and opportunity we have to raise awareness among our employees on relevant human rights and social responsibility issues. Our forced labor awareness program makes ongoing training available to employees around the world to recognize indicators of forced labor and report concerns to appropriate authorities in a way that puts the interests of potential victims first. The training provides scenarios and examples of signs of human trafficking and provides guidance on how to act in a manner that prioritizes the safety of potential victims. Additionally, we offer training to our suppliers and their workers.

We train Amazon truck drivers on modern slavery prevention. We are an official corporate sponsor of Truckers Against Trafficking (TAT), an organization dedicated to combating human trafficking in the trucking industry. We began using TAT training modules to train our internal fleet of drivers, teaching them how to identify and respond to potential victims of human trafficking. As of January 2021, we had trained 100% of Amazon drivers and employees within Amazon's Transportation Operations Management.

...with our Selling Partners

We include our Supply Chain Standards as part of our business relationship with Selling Partners. Our Supply Chain Standards are available publicly online and are translated in to 17 languages. Selling Partners are third-party sellers (sellers) and retail vendors (vendors) who offer products for sale in Amazon's stores. Our Supply Chain Standards apply to every product sold in our stores, and we expect Selling Partners to do their own due diligence, helping to ensure that products are produced in safe, healthy, and inclusive work environments. Selling Partners contracting with Amazon for services, (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 increased due diligence of Amazon Selling Partners. We evaluate credible allegations or reports of Selling Partner violations of our Supply Chain Standards, including but not limited to those published by governments, reputable investigators, journalists, or human rights defenders. If we have reason to suspect certain products do not meet our Supply Chain Standards, we may request that the Selling Partner do the following: demonstrate that the products it sells in our store were manufactured in accordance with Amazon's Supply Chain Standards, provide evidence of auditing protocols, show processes for assessing factory working conditions, engage in unannounced audits, participate in an approved industry association that includes factory monitoring, or verify where the products are made.



...with AWS

Our customers use AWS technology to combat modern slavery. Thorn, an organization that builds technology to defend children from sexual abuse, leverages AWS machine learning tools in their Spotlight product. Spotlight's sophisticated machine learning capabilities save time for investigators by automatically flagging ads likely to represent victims of child sex trafficking. Investigators search Spotlight's constantly growing database of ads and set up automated alerts to empower proactive investigations. Spotlight has helped identify more than 20,000 child sex trafficking victims.

Amazon supports Polaris, a non-profit leading a social justice movement to fight sex and labor trafficking at the massive scale of the problem—25 million people worldwide deprived of the freedom to choose how they live and work. Through the U.S. National Human Trafficking Hotline, Polaris has responded to more than 73,000 situations of human trafficking since 2007. AWS works with Polaris to infuse cutting-edge technology into its infrastructure to accelerate the development of the largest known U.S. data set on trafficking. With the guidance of survivors, Polaris uses that data to improve the way trafficking is identified, how victims and survivors are assisted, and how communities, businesses and governments can prevent human trafficking by transforming the underlying inequities and oppressions that make it possible.

...with other organizations

Amazon is collaborating with NGOs, governments, and other companies to reduce and disrupt modern slavery. Tech Against Trafficking is a coalition of companies collaborating with global experts to help eradicate human trafficking using technology. Amazon sits on the Tech Against Trafficking steering committee and has leveraged the expertise and resources of AWS to help scale tech solutions in the anti-trafficking field. Tech Against Trafficking works with civil society, law enforcement, academia, technologists, and survivors to advance and scale the use of technology to prevent, disrupt, and reduce human trafficking and increase and expand survivors' access to resources.

Amazon is increasing partnerships with key multi-stakeholder initiatives. We expanded our relationships with key external partners, the Responsible Business Alliance and International Organization of Migration, and began working with the Issara Institute to address issues of human trafficking and forced labor through worker voice, partnership, and innovation. 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.

Amazon is investing in organizations that support victims of modern slavery. We sponsor UK modern slavery helpline Unseen, investing in their efforts to provide immediate and long-term assistance to potential victims of modern slavery and to help ensure the helpline's continued growth. The helpline provides direct response and services to potential victims of modern slavery, as well as trainings and programming to support victims.



8. Modern Slavery in the Context of COVID-19

We have been diligently working to take action to mitigate the toll COVID-19 has taken on people around the world. We know that suppliers and their workers are uniquely impacted by COVID-19. The ILO reports⁹ that COVID-19 will likely exacerbate underlying factors driving modern slavery, including poverty, limited access to decent work opportunities, social marginalization, discrimination, the lack of universal quality education, and the prevalence of the informal economy and weak social dialogue. In 2021, we took action to address heightened modern slavery risks in our supply chain due to COVID-19 in several areas.

We adapted our supplier due diligence to the constraints posed by COVID-19. We continue to monitor suppliers for compliance with our Supply Chain Standards and made necessary modifications to auditing procedures based on internal and external stakeholder recommendations. Though COVID-19 limited our ability to have auditors on site, we continued our diligence through alternative means through this critical period.

We have maintained close communication with suppliers during this crisis. At the beginning of the pandemic, we communicated with our suppliers to remind them of our expectations based on our Supply Chain Standards. We later developed and shared detailed COVID-19 specific guidelines. We encourage suppliers to take certain measures, such as not ending worker contracts, continuing to pay workers during shutdowns, and providing more flexibility to workers impacted by COVID-19, for example, if a worker or family member is sick.

We are partnering with organizations providing critical support to suppliers and workers during the pandemic. Building on our 2020 investments in organizations providing critical frontline support to workers impacted by the pandemic, in 2021, we made an additional \$1.65M investment to fund new tools and collaborate with several organizations to help workers impacted by the ongoing pandemic. Supply chain workers globally have been vulnerable to job losses, infection, and worsening living and labor conditions. This investment will help provide an estimated 54,000 workers with access to crisis response resources they need and help small businesses weather the economic impacts of COVID-19, with a focus on Asia's most COVID-vulnerable regions.

We continue to assess our efforts and outcomes to mitigate the increased risk of modern slavery for workers in our supply chain due to COVID-19. With these insights and other information we are collecting through our human rights due diligence efforts, we are continually assessing our programs and protocols and looking for additional ways to support our stakeholders in mitigating the impacts of COVID-19 and increased risks of modern slavery.

Further efforts highlighting the ways we are supporting our employees and the broader global community during the COVID-19 pandemic can be found in our Sustainability Report.

9. Engagement with Strategic Stakeholders

We engage with industry and multi-stakeholder organizations to help ensure that we are continually improving our efforts to address modern slavery and collaborate on training and other initiatives. We also form strategic partnerships with organizations on the ground in areas where we operate to support their efforts to provide immediate, direct support to potential victims.

| | |
|---|---|
| Amader Kotha | Amazon began working with the Amader Kotha Helpline in 2020. The Amader Kotha Helpline provides workers with a mechanism to report and resolve safety and other concerns in the ready-made garment sector in Bangladesh. The Helpline was initially established as a project of the Alliance for Bangladesh Worker Safety following the Rana Plaza tragedy. In 2018, the Helpline became an independent initiative available to all garment workers with the support of factories and brands. |
| amfori | In 2019, Amazon began working with amfori, a leading global business association for open and sustainable trade. amfori brings together over 2,400 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 | In 2019, Amazon began engaging with Better Buying, a leading global initiative committed to reimagining supply chain sustainability and leveraging data to strengthen supplier-buyer partnerships by improving purchasing practices. Better Buying's cloud-based platform enables suppliers to anonymously rate the purchasing practices of their buyers, providing data-driven insights which can be used by retailers, brands, and suppliers to continuously improve purchasing practices 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. Together, these organizations are focused on working conditions, respect for labour rights, and making the global garment sector more competitive. By working with factories and training workers on their rights, Better Work supports greater compliance with national labor laws and international labor standards. |
| Better Cotton | Amazon is a member of Better Cotton, supporting the transition to sourcing more sustainable cotton within Amazon-owned Private Brand apparel products. |
| Business for Social Responsibility | Amazon is a member of BSR, a global organization that works with partners across business, civil society, and government sectors to build a just and sustainable world. |
| The Centre for Child Rights and Business | Amazon joined the Centre for The Child Rights and Business (The Centre) and signed on to support the Joint Action Pledge in 2021 to strengthen the protection of children's rights and accelerate action to address child labour in global supply chains. The Centre offers services and support covering a broad range of child rights and well-being issues including responsible recruitment practices with a focus on child labor prevention and remediation, child rights risks assessments, support packages for young workers and other vulnerable groups, and a comprehensive set of services to create family-friendly workplaces in supply chains and support parent workers. |



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| International Organization for Migration | The International Organization for Migration (IOM), a United Nations organization that supports migrants across the world including those in emergency situations, develops effective responses to the shifting dynamics of migration and is a key source of advice on migration policy and practice. Amazon is partnering with the IOM Corporate Responsibility in Eliminating Slavery and Trafficking (CREST), a regional initiative that supports companies in upholding the human and labor rights of migrant workers, to develop critical supplier training to address recruitment practices. |
| Issara Institute | Issara Institute is an independent non-profit organization based in Asia and the US tackling issues of human trafficking and forced labor through worker voice, partnership, and innovation. Through Issara's Strategic Partners Program, Amazon is advancing its support and commitments to workers, suppliers, and recruitment agencies in its own supply chain and the broader ecosystem. |
| Nest | Amazon partners with Nest, a non-profit organization supporting the growth and development of the global artisan sector to build a world of greater gender equity and economic inclusion. Through their Ethical Handcraft program, which protects the rights of handworkers in the informal sector, and a host of artisan and maker business development programs, Nest is bringing radical transparency and opportunity to the global handworker economy. Amazon is proud to serve on Nest's Steering Committee. |
| Polaris | Amazon supports Polaris, a non-profit leading a social justice movement to fight sex and labor trafficking at the massive scale of the problem—25 million people worldwide deprived of the freedom to choose how they live and work. Through the U.S. National Human Trafficking Hotline, Polaris has responded to more than 73,000 situations of human trafficking since 2007. AWS works with Polaris to infuse cutting-edge technology into its infrastructure to accelerate the development of the largest known U.S. data set on trafficking. With the guidance of survivors, Polaris uses that data to improve the way trafficking is identified, how victims and survivors are assisted, and how communities, businesses, and governments can prevent human trafficking by transforming the underlying inequities and oppressions that make it possible. |
| Public-Private Alliance for the Responsible Minerals Trade | Amazon joined the Public-Private Alliance for Responsible Minerals Trade (PPA) in 2020. The PPA is a multi-sector initiative among leaders in civil society, government, and industry to support projects in the Democratic Republic of the Congo and the surrounding Great Lakes Region of Central Africa that improve the due diligence and governance systems needed for ethical supply chains. |
| Responsible Business Alliance | Amazon is a member of the Responsible Business Alliance (RBA), a nonprofit coalition of companies committed to supporting the rights and well-being of workers and communities worldwide affected by global supply chains. We accept RBA Validated Assessment Program (VAP) audits as part of our Supplier due diligence program. |
| Responsible Labor Initiative | Amazon is a member of the Responsible Labor Initiative (RLI), a multi-industry, multi-stakeholder initiative hosted by the RBA. The RLI is focused on ensuring that the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted. |
| Responsible Minerals Initiative | Amazon is a member of the Responsible Minerals Initiative (RMI), an initiative of the RBA, which provides companies with tools and resources to make sourcing decisions that improve regulatory compliance and support responsible sourcing globally. Amazon participates in RMI working groups devoted to cobalt, mica, and smelter engagement. |



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| The Responsible Sourcing Network initiative YESS™ | Amazon is sponsoring and participating in Responsible Sourcing Network initiative YESS™: Yarn Ethically & Sustainably Sourced. YESS works in the cotton value chain by providing training to, and managing the assessment of, spinners and fabric mills to identify and address forced labor in cotton production. |
| Stolen Youth | Amazon partners with StolenYouth, a Seattle-based organization with the mission to end child sex trafficking in the state of Washington through prevention, connecting trafficked youth to resources and services, and empowering survivors along their path to recovery and a promising future. We support StolenYouth by providing both financial support and goods donations. |
| Sedex | Amazon is a member of Sedex, a global membership organization that empowers companies to build responsible supply chains. Sedex provides businesses with a comprehensive data platform, practical tools and resources to operate ethically, source responsibly, and work with their suppliers to create fair working conditions for the people who make their products and services. We accept Sedex Members Ethical Trade Audit (SMETA) audits as part of our Responsible Sourcing Program. |
| Sustainable Apparel Coalition | Amazon is a member of the Sustainable Apparel Coalition (SAC), a global, industry-wide group of leading apparel, footwear, and textile brands, retailers, suppliers, service providers, trade associations, non-profits, NGOs, and academic institutions working to reduce environmental impact and promote social justice throughout the global value chain. |
| Swasti | Amazon partners with Swasti, a global nonprofit committed to ensuring access to quality healthcare for workers in marginalized communities. With our support, Swasti set up a worker helpline, developed health protocols for workers to return to work safely, and provided critical mental health, healthcare, and social entitlement support to workers, their families and their communities. |
| Tech Against Trafficking | Amazon is a Steering Committee Member of Tech Against Trafficking, a coalition of companies collaborating with global experts to help eradicate human trafficking using technology. |
| Thorn | Thorn, an organization that builds technology to defend children from sexual abuse, leverages AWS machine learning tools in their Spotlight product. Spotlight's sophisticated machine learning capabilities save time for investigators by automatically flagging ads likely to represent victims of child sex trafficking. Investigators search Spotlight's constantly growing database of ads and set up automated alerts to empower proactive investigations. Spotlight has helped identify more than 20,000 child sex trafficking victims. |
| Truckers Against Trafficking | Amazon is an official corporate sponsor of Truckers Against Trafficking (TAT), an organization dedicated to combating human trafficking in the trucking industry. |
| United States Council for International Business | Amazon is a member of the United States Council for International Business (USCIB). As the US member of the International Organization of Employers, USCIB represents American business on the Governing Body of the ILO, and engages with US and international policymakers for policies that support respect for human rights under the UN Guiding Principles on Business and Human Rights, including on issues of forced labor and human trafficking. |
| Unseen | Amazon sponsors Unseen, a UK anti-slavery charity that operates the UK-wide Modern Slavery & Exploitation Helpline and provides immediate and long-term support to potential victims of modern slavery. |



10. Our Commitments and Progress

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. We regularly measure our progress against our commitments. As our program grows, we look forward to further engaging in company-wide efforts to address risks posed by modern slavery.

| Commitment | Progress Against Commitments in 2021 |
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| Regularly review and update our policies and assessment processes | <p>We completed foundational assessments of our human rights risks: In 2021, we began implementing recommendations from the HRIA on the raw and recovered materials supply chain for Amazon-branded digital devices, such as increasing our support for industry collaboration on responsible mineral sourcing and building the capacity of our supply chain partners to effectively manage human rights risks.</p> |
| Grow our partnerships with organizations that are combatting modern slavery | <p>We invested in new partnerships and stakeholder collaborations: Building on our work with the Centre for Child Rights and Business, Amazon signed on to the Joint Action Pledge to strengthen the protection of children’s rights and accelerate action to address child labor in global supply chains.</p> <p>We joined the Issara Institute as part of their Strategic Partners Program.</p> |
| Expand our training and capacity-building efforts | <p>We implemented training programs in multiple parts of our business: We distributed our Responsible Recruitment Guidebook to over 70 suppliers in recruitment fee issues were identified.</p> <p>We continued to work directly with our suppliers to strengthen responsible recruitment practices and to encourage the repayment of fees to workers.</p> <p>We offered training on responsible recruitment practices through the Responsible Business Alliance and International Organization on Migration to over 50 suppliers and offered worker awareness training for sites in a high-risk region to improve foreign migrant workers’ livelihood.</p> |
| Regularly review and improve our supply chain due diligence efforts | <p>We continued to map deeper tiers of our Amazon-branded product supply chain. We completed our first commodity materiality and risk assessment for Amazon-branded products and identified eight commodities with salient social and environmental risks as a key milestone in the development of our responsible commodity sourcing roadmap.</p> |



11. Approval & Signature

Internal stakeholders were consulted during the drafting of this statement and were given the opportunity to review and provide feedback at several stages of the process.

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, 2022**

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, 2022**