

Norway Transparency Act Report 2022

Amazon Web Services EMEA SARL - Norway Branch



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1. About This Report

The obligations under the Norwegian Transparency Act (Åpenhetsloven) (the “Transparency Act”) apply to the activities of Amazon Web Services EMEA SARL’s (“AWS EMEA”) sales and marketing branch in Norway (“AWS Norway”). This report was prepared in accordance with the requirements of the Transparency Act and covers the period from 1 July 2022 to 31 December 2022 (“Reporting Period”).

2. About the AWS Norway Operations

AWS EMEA, including its branches like AWS Norway, serves developers and enterprises of all sizes such as start-ups, government agencies, and academic institutions and offers a broad set of on-demand technology services, including compute, storage, database, analytics, machine learning, and other services.

3. Policies and Governance for Handling Actual and Potential Adverse Impacts on Fundamental Human Rights and Decent Working Conditions

3.1. Policies

AWS Norway is committed to respecting human rights and operating in compliance with all applicable laws and regulations, including the Transparency Act.

AWS Norway, as a branch of AWS EMEA (a subsidiary of Amazon.com, Inc. (“Amazon”)), is committed to upholding Amazon’s global policies, including Amazon’s Code of Business Conduct and Ethics (can be accessed at: <https://ir.aboutamazon.com/corporate-governance/documents-and-charters/code-of-business-conduct-and-ethics/default.aspx>, Global Human Rights Principles (can be accessed at: <https://sustainability.aboutamazon.com/society/human-rights/principles>), and Supply Chain Standards (can be accessed at: <https://amzn.to/supply-chain-standards>), which help to ensure the people and communities that support our entire value chain are treated with fundamental dignity and respect.

At Amazon, we strive to ensure our products and services are provided in a way that respects internationally recognized human rights. Amazon’s policies are informed by international standards; Amazon is committed to respecting and supporting the United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs), the UN Universal Declaration of Human Rights, the Core Conventions of the International Labour Organization (ILO), and the ILO Declaration on Fundamental Principles and Rights at

Work. Amazon’s commitment to human rights is set forth in Amazon’s Global Human Rights Principles, which underline the importance of embedding respect for human rights throughout our business.

Amazon’s Code of Business Conduct and Ethics requires that, in performing their job duties, all Amazon employees, including those of AWS Norway, act lawfully, ethically, and in the best interests of Amazon. Employees, including AWS Norway employees, may raise questions or report suspected violations of the Code of Business Conduct and Ethics through Amazon’s third party-managed Ethics Line.

In late 2021, Amazon signed the UN Women’s Empowerment Principles, further strengthening our commitment to promote gender equity and empowerment in the workplace and communities. In December 2022, we published our latest update to Amazon’s Supply Chain Standards, working with external stakeholders to align our requirements with current best practices and regulatory standards.

Amazon’s Supply Chain Standards apply to all suppliers of goods and services for Amazon and Amazon’s subsidiaries (“Suppliers”) and set forth requirements governing labor rights and working conditions, including the following:

Child Labor

Amazon does not tolerate the use of child labor. Suppliers are required 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). Suppliers employing young workers must follow all local laws related to hours of work. Suppliers should implement an age verification mechanism. Cases of child labor must be remediated, including through corrective measures that facilitate the child’s safety and wellbeing.

Forced Labor

Suppliers must not use forced labor—slave, prison, indentured, bonded, or otherwise. Amazon does not tolerate Suppliers that traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. All work must be voluntary. Workers must be free to leave work and terminate their employment or other work status with reasonable notice, without penalty. There shall



be no unreasonable restrictions on workers' freedom of movement in any Supplier-controlled facility. Workers must not be required to pay recruitment, hiring, agents' or brokers' fees, or other related fees or costs for their employment either in their home country, any intermediate country, or the country where work is performed.

Migrant Workers

Suppliers should pay particular attention to the risks of exploitation that both domestic and foreign migrant workers face. Suppliers must respect migrant workers' rights and not discriminate against migrant workers. Migrant workers must have the same employment protections and rights afforded to local employees, where legally permissible. Workers must be able to voluntarily terminate contracts without penalty upon reasonable or legally applicable notice.

Wages and Benefits

Suppliers are required to pay their workers, including contract workers and those paid by piece rate, in a timely manner and provide compensation (including minimum wages and allowances, overtime pay, benefits, and paid leave) in a manner that satisfies or exceeds applicable laws. In countries where such laws do not exist, Suppliers are encouraged to pay wages that meet or exceed industry average, pay overtime at a rate exceeding the regular hourly compensation rate, and maintain policies that provide worker benefits, such as leave. Suppliers are required to provide equal pay for work of "equal or comparable value", without discrimination.

Anti-discrimination

Amazon Suppliers must not discriminate on the basis of race, color, national origin, sex, gender identity, sexual orientation, religion, creed, the presence of any physical, sensory, or mental disabilities, age, political opinion, pregnancy, citizenship, migrant status, veteran status, ethnicity, ancestry, caste, marital or family status, or legally protected statuses in hiring and working practices such as recruitment, job applications, promotions, job assignments, training, wages, benefits, and termination.

Anti-Harassment and Abuse

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. These include threats of violence, corporal punishment, mental coercion, sexual harassment, gender-based

violence, unreasonable restrictions on entering or exiting work and residential facilities, arbitrary arrest or detention, or any other forms of intimidation. We encourage Suppliers to implement policies that prohibit these activities and to communicate it to all workers in their native language. We encourage Suppliers to provide gender-sensitive sexual harassment and gender-based violence training to all managers, supervisors, and workers.

Grievance Mechanism and Reporting

All workers must be free to voice their concerns and seek resolution of issues covered by Amazon's Supply Chain Standards in a confidential and anonymous manner free from retaliation. Suppliers are required to create and maintain an equitable and effective grievance mechanism, for workers to submit their grievances. Suppliers must maintain an effective resolution process, clearly communicated to workers, to timely investigate and address worker concerns.

Freedom of Association

Suppliers must respect the rights of workers to form, join, or refrain from joining, a labor union or other lawful organization of their own selection. Suppliers must respect workers' rights to freedom of association and collective bargaining. Workers must not be penalized or subjected to reprisal, harassment, or intimidation for the non-violent exercise of these rights.

Health and Safety

Suppliers are required to provide workers with a safe and healthy work environment that avoids harm to workers' physical and mental health. Suppliers must comply with applicable laws regarding occupational safety, working conditions, and health standards. Where required by law, Amazon requires that Suppliers facilitate worker health and safety committees, post health and safety information in a location and language accessible to workers, and provide health and safety training to workers at the beginning of employment and regularly thereafter, including on emergencies and injuries that occur in the workplace. Where the law is silent, we encourage these best practices.

Safe Working Conditions, Occupational Safety, and Industrial Hygiene

Suppliers must maintain safe working conditions, including by providing safe Supplier-controlled facilities, facility infrastructure, and machines. Facilities and Supplier-controlled worker environments must meet all legal requirements and must



be structurally sound with adequate strength of materials, professionally designed for risks from seismic activity, wind, and other natural disasters.

More detail on these and a complete list of standards can be found in Amazon's Supply Chain Standards.

3.2. Governance

Amazon's Board of Directors (the "Board") is responsible for the control and direction of Amazon, including its subsidiaries and branches such as AWS Norway, and regularly reviews reports from management on various aspects of the business, including related risks, tactics, 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 three standing committees. Among other duties and responsibilities, the Nominating and Corporate Governance Committee oversees Amazon's environmental, social, and corporate governance policies and initiatives. These include policies and initiatives related to corporate social responsibility, such as human rights and ethical business practices, and those risks associated with our operations and supply chain. 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.

4. Actual Adverse Impacts and Significant Risks of Adverse Impacts that AWS Norway has Identified Through its Due Diligence

4.1. Due Diligence of AWS Norway: Own Operations

4.1.1. Our Approach

As a global company, we recognize our responsibility and opportunity to raise awareness among employees on human rights issues. We have a central team that works across the company to conduct human rights due diligence and embed human rights considerations into everyday business decisions. Please refer to our annual Sustainability Report for more information about Amazon's salient human rights risks. (The latest version of our Annual Sustainability Report can be accessed here: <https://sustainability.aboutamazon.com/reporting-and-downloads>).

All employees take mandatory compliance training

courses on the Code of Business Conduct and Ethics, Anti-Bribery Compliance, and Workplace Harassment. We also offer trainings tailored to certain human rights risks. For example, our forced labor awareness program makes ongoing training available to employees around the world to help them recognize indicators of forced labor and report concerns to appropriate authorities in a way that puts the interests of potential victims first.

We have not identified any actual adverse impacts in our operations in AWS Norway. Also, based on AWS Norway's business and employee profile (sales and marketing) and geography (Norway), we assess the overall risk profile of AWS Norway's own operations as low, as it relates to human rights and labor rights risks specified in the Transparency Act. As further explained in 4.2, the potential for violations of human rights or decent working conditions in AWS Norway's supply chain is also low.

4.1.2. Alert or Grievance Mechanisms

As part of AWS' work to continuously evaluate our operations and supply chains to identify, assess, and address human rights, health and safety, and environmental risks, we engage in direct communications with employees and continuously monitor feedback. Among other means, AWS Norway seeks to understand its employees' concerns through dialogue directly with Human Resources teams and via anonymous workplace feedback surveys.

Amazon's Legal Business Conduct and Ethics Team monitors issues raised by Amazon employees and contract workers to our Ethics Line, including those within AWS Norway, and reports allegations of violations of the Code of Business Conduct and Ethics to Amazon's Audit Committee. Full-time, part-time, and temporary employees alike may raise questions or report suspected violations of the Code of Business Conduct and Ethics. Amazon's Ethics Line allows for phone and web submissions, is managed by an independent third party, and reports may be made anonymously.

There are several ways in which we, at AWS Norway, engage with our employees. For example, we have an "Open Door Philosophy" that welcomes and encourages any employee to discuss suggestions, concerns, or feedback with their manager, a Human Resources team member, or a member of the leadership team. We also have "Connections," a real-time, company-wide employee feedback mechanism designed to listen to and learn from employees at scale to improve the employee

experience. Each day Connections questions are delivered to every Amazon employee on a computer, a workstation device, or a hand scanner. Employees may choose to answer or not answer any question, and individual responses are aggregated and shared with managers at the team level to maintain confidentiality. Connections analyzes response data and provides insights to managers and leaders to review and take actions as they uncover issues or see opportunities to improve.

4.2. Due Diligence of AWS Norway: Supply Chain

4.2.1. Methodology

At AWS Norway, we identified and assessed potential human rights and decent working conditions risks associated with our supply chain based on the Transparency Act and on core international labor and human rights instruments, including the UNGPs, the UN Universal Declaration of Human Rights, the Core Conventions of the ILO, and the ILO Declaration on Fundamental Principles and Rights at Work, as well as the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights.

To identify salient risks, current and potential adverse impacts within AWS Norway's supply chain were assessed based on the following criteria outlined by the UNGPs, including the likelihood, scale, scope, and irremediable character of any impacts.

In order to conduct the supplier assessment, AWS Norway first mapped the supply chain, and then solicited supplier self-assessments regarding human rights and decent working conditions from all non-de minimis direct suppliers. The supplier self-assessment questionnaire included the following areas:

- **Human Rights:**
 - Forced labor (elimination of all forms of forced or obligatory labor, and modern slavery)
 - Child labor, including "worst forms of child labor" as defined by the ILO
 - Freedom of association; right to collectively bargain; right to form / join trade unions
 - Elimination of discrimination in employment and occupation made on the basis of race, color, sex, religion, political opinion, national extraction or social origin, disability, or health status
 - Fair wages and equal remuneration for work of equal value without distinction of any kind, particularly women being guaranteed condi-

tions of work not inferior to those enjoyed by men, with equal pay for equal work

- **Decent working conditions:**

- Equal remuneration
- Safe and healthy working conditions, including addressing occupational safety, emergency preparedness and occupational injury and illness
- Equal opportunity for promotion
- Rest, leisure, and reasonable limitation of working hours and periodic holidays with pay, as well as remuneration for public holidays

4.2.2. Assessment of Suppliers

AWS Norway's suppliers consist of professional service providers, including public relations, accounting and legal services, pension and insurance, human resources, and facilities management.

Amazon's standard agreements with service providers mandate compliance with Amazon's Supply Chain Standards. Amazon's global teams communicate the Supply Chain Standards and help suppliers build their capacity to provide working environments that are safe and respectful of human rights. AWS Norway expects suppliers to hold their subcontractors and labor agents to the standards and practices covered by Amazon's Supply Chain Standards. If noncompliance with the Supply Chain Standards were identified, AWS Norway would act based on the Standards.

Altogether, based on the responses to the self-assessment questionnaires; the suppliers' sectors (professional services such as accounting, legal, insurance); worker classification (largely skilled professionals); geography (largely Northern Europe and United States), AWS Norway concluded there is low risk for violations of human rights or decent working conditions in our supply chain.

5. Measures Implemented to Help Prevent and/or Mitigate Risks of Adverse Impacts

The supplier due diligence process described above did not show any indications of child labor, forced labor, wage disparity, employer restrictions on freedom of association or collective bargaining, nor health and safety risks. Neither did we uncover any significant risks of such adverse impacts.

While we identified suppliers who are less advanced than others in their governance and processes for managing human rights, such as suppliers that lack



corporate policies on human rights, there were no significant risks to workers identified.

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

Signed by:

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