

Modern Slavery Statement 2025

Amazon





Contents

Introduction	3
Our Business.....	4
Our Governance and Policy Framework	4
Governance	4
Policies.....	5
Assessing Risk	5
Identifying Risk	5
Prioritizing Risk	6
Addressing Risk.....	7
Issue Detection.....	7
Prevention.....	9
Remediation.....	12
Monitoring Effectiveness and Impact	14
Approval and Signature	15
Appendix – 2025 Norway Transparency Act Report	16
1. Introduction	16
2. AWS Norway Business Structure, Operations, Policies and Governance.....	16
3. Due Diligence of AWS Norway.....	16
4. Results and Measures	16



Introduction

Amazon's policies, practices, and procedures to assess and address the risk of modern slavery apply to our operations and supply chains worldwide. This Modern Slavery Statement ("Statement") covers actions taken by Amazon.com, Inc. and its covered subsidiaries ("Amazon"),¹ including Whole Foods Market and its subsidiaries,² from January 1, 2025 to December 31, 2025.³ It has been prepared in compliance with the requirements of the [Australia Modern Slavery Act 2018](#),⁴ the [California Transparency in Supply Chains Act](#), [Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act](#),⁵ [Norway's Transparency Act](#), and the [United Kingdom Modern Slavery Act 2015](#).⁶

Our [Global Human Rights Principles](#) demonstrate our commitment to respecting the fundamental dignity of people throughout our entire value chain. Consistent with our [Global Human Rights Principles](#), Amazon does not tolerate any form of modern slavery and recognizes the unique responsibility of the private sector in combating these risks.

In accordance with internationally recognized human rights standards, this Statement defines modern slavery as forced labor, hazardous or exploitative child labor, and human trafficking in all forms, including slave labor, involuntary or exploitative prison labor, indentured servitude, or bonded labor.

Combating modern slavery requires commitment, resources, expertise, and innovative solutions from governments, international organizations, the private sector, civil society, and people with lived experience. At Amazon, we recognize the private sector's unique responsibility to respect human rights and are committed to addressing modern slavery risks that may arise in the course of our business.

Innovation is essential to our approach. In 2025, Amazon explored using Artificial Intelligence (AI) and Machine Learning (ML) tools to enable more effective risk assessment, audit processing, and decision-making processes across our complex supplier network. By leveraging AI, we can transform large amounts of data into actionable insights used by Amazon's central human rights team to help inform business priorities, strengthen human rights due diligence throughout our value chain, and guide decision-making throughout our business. As we continue developing and testing this technology, we maintain a firm commitment to responsible use of AI and to a human-in-the-loop approach, leveraging our team's deep human rights expertise to ensure responsible implementation.

In 2025, we engaged with diverse stakeholders—including industry associations, non-governmental organizations (NGOs), suppliers, multi-stakeholder initiatives, and other companies—to strengthen our efforts to identify, prevent, and address the risk of modern slavery in our operations and business relationships. We expanded supplier education through training, workshops, and resources to improve suppliers' understanding of our [Supply Chain Standards](#). To enhance worker protection across our global operations, we implemented new partnerships and programs, including initiatives focused on responsible recruitment. We strengthened our global human rights risk management by expanding our supplier audit program to reach more of Amazon's global logistics network, conducting audits across third-party labor, service, and not-for-resale goods providers in our logistics, warehousing, and construction supply chain. Our ongoing commitment to improve access to effective grievance mechanisms led to new reporting tools and expanded mechanisms for supply chain workers to voice their concerns. Through these efforts, we continued developing best practices to address modern slavery risks.

This Statement details our progress and ongoing commitment to combating modern slavery.

¹ This Statement excludes any entity that elects to report independently.

² Whole Foods Market, Inc., Whole Foods Market Canada, Inc., Whole Foods Market-WO, Inc., and Fresh & Wild Ltd.

³ Metrics contained herein cover 2025 activities, unless otherwise indicated.

⁴ The Australian subsidiaries that are required to report under the Modern Slavery Act 2018 for 2025 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.

⁵ The Canadian subsidiaries covered by this Statement are Amazon.com.ca ULC, Whole Foods Market Canada, Inc., and Whole Foods Market-WO, Inc.

⁶ The UK subsidiaries covered by this Statement that are required to report under the Modern Slavery Act 2015 are Amazon Data Services UK Limited, Amazon Development Centre London Limited, Amazon Development Centre Scotland Limited, Amazon Digital UK Limited, Amazon EU SARL, UK Branch, Amazon Online UK Limited, Amazon Payments UK Limited, Amazon UK Services Ltd., Amazon Web Services EMEA SARL, UK Branch, Audible Limited, Evi Technologies Limited, Amazon Business EU SARL UK Branch, and Fresh & Wild Limited.



Our Business

Amazon is a global company, headquartered in Washington's Puget Sound region and Arlington, Virginia, in the United States, with approximately 1.6 million full- and part-time employees worldwide and operations in Africa, Asia-Pacific, Europe, Latin America, the Middle East, and North America.

Our businesses encompass a variety of product types, service offerings, and delivery channels. We offer products and services—both Amazon-branded and from 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, including, but not limited to, 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 both direct and indirect suppliers that provide a diverse range of products and services, including, but not limited to, finished products, raw materials, packaging materials, and logistics, transportation, construction, cleaning, security, and maintenance 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 transportation carriers, delivery partners, and labor agencies. As one example, Amazon-branded electronic 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.

We serve consumers through our online and physical stores.⁷ 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, and we develop and produce media content. In addition, we offer subscription 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 several 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, 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 [Sustainability Report](#), [Annual Report](#), and our latest [Proxy Statement](#).

Our Governance and Policy Framework

Amazon is committed to embedding respect for human rights throughout our business activities, including our policy and governance framework.

Governance

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. The

⁷ In 2025, applicable subsidiaries operated physical stores in the UK, Canada and the US.



Board's Nominating and Corporate Governance Committee oversees and monitors Amazon's corporate social responsibility policies and initiatives, including risks related to human rights and ethical business practices, and risks related to Amazon's operations and engagement with customers, suppliers, and communities. Whole Foods Market's human rights governance is integrated into Amazon's enterprise-wide governance framework. For more information, please see our most recent [Sustainability Report](#) and [Investor Relations website](#).

Policies

Our efforts to address modern slavery risks across our business and supply chains are anchored in our policies, which convey our values and expectations, setting a high bar for ourselves and our suppliers. We regularly review and work to improve these policies by engaging external stakeholders and monitoring evolving international human rights standards, regulations, and industry best practices to better support our employees and our suppliers.

Our [Global Human Rights Principles](#), last updated in 2025, state that we do not tolerate the use of child labor, involuntary or forced labor, human trafficking, or modern slavery in any form—including slave labor, involuntary or exploitative prison labor, indentured servitude, or bonded labor—in our operations or value chain.

Our [Code of Business Conduct and Ethics](#) (Code of Conduct), associated policies, procedures, training, and communications outline our expectations of our employees. All Amazon employees receive Code of Conduct training during onboarding, with regular refresher training and acknowledgment thereafter. Amazon provides its employees with various secure and accessible channels with guidelines for reporting concerns and violations. Employees can also voice concerns, anonymously report potential violations of Amazon's Code of Conduct, and ask questions about potentially unethical conduct through Amazon's Ethics Line. Amazon's Code of Conduct explicitly prohibits any form of retaliation against employees who report misconduct in good faith. We take all allegations seriously.

Our Supply Chain Standards⁸, available in 23 languages and dialects, are the backbone of our efforts to enable a responsible supply chain. They

⁸ Whole Foods Market's Supplier Code of Conduct aligns with Amazon's Supply Chain Standards and incorporates the same requirements with respect to child labor, forced labor, human trafficking, and migrant worker protections. Whole Foods Market supplier agreements incorporate the Supplier Code of Conduct, and Whole Foods Market works with suppliers across its supply chain to adopt and raise awareness of these standards.

apply to suppliers of goods and services for Amazon and its subsidiaries, including providers, vendors, selling partners⁹, contractors, and subcontractors (collectively "suppliers"). The Standards explicitly prohibit suppliers from using forced labor, human trafficking, and modern slavery; all work must be voluntary, suppliers must not cause workers to lose possession of or access to their identity documents, and suppliers are required to bear or reimburse to workers the cost of any recruitment fees paid by workers. Products sold in Amazon stores, and products and services provided to Amazon, must be manufactured, produced, or provided in accordance with our Supply Chain Standards. Suppliers are required to hold their own suppliers, subcontractors, recruitment agents, and labor agents to applicable laws and our Standards, and work with them to adopt and raise awareness of our Standards.

Suppliers are required to conform to our Supply Chain Standards, even when our Standards exceed the requirements of applicable law. Suppliers must follow all applicable laws and regulations. When applicable law conflicts with our Standards, suppliers must follow the law while finding a way to respect the principles of internationally recognized human rights and the expectations contained in our Standards.

We encourage suppliers to perform human rights and environmental due diligence to help ensure their products and services are produced and supplied in a way that respects human rights and the environment and protect the fundamental dignity of workers.

Assessing Risk

Amazon's central team of experts works across the company to conduct human rights and environmental due diligence. Through this work, Amazon takes steps to identify and prioritize risks of modern slavery within our operations and supply chains, address and mitigate identified risks, measure progress, and remediate harm when issues occur.

Identifying Risk

We work to identify region-specific risks using globally accepted risk indices such as the World Bank's Worldwide Governance Indicators, the Global Slavery Index, and indices issued by the U.S. Department of Labor, International Labour Organization (ILO), and UNICEF. These tools help us identify areas with heightened modern slavery

⁹ Selling partners are retail vendors and third-party sellers that sell or supply products and services in Amazon's stores.



Additional requirements in our Supply Chain Standards

- 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). If cases of child labor are identified, our Supply Chain Standards mandate remediation, including corrective measures that facilitate the child’s safety and wellbeing.
- 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.
- 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.

risks, including large populations of migrant workers, varying labor standards and enforcement, and well-documented modern slavery prevalence. Beyond quantitative risk indices, we partner with NGOs with expertise in modern slavery, leveraging this expertise to help us better identify risks within our supply chain and operations and inform our strategies.

To further enhance our risk identification process, we use various risk assessment methods, such as saliency assessments, human rights impact assessments, and due diligence assessments, to enable us to identify, prioritize, and mitigate human rights risks across our business and supply chains.¹⁰ These assessments help us identify salient risks, build capacity and business-level ownership, and conduct targeted human rights and environmental due diligence to monitor risks and support supplier compliance with our Supply Chain Standards.

We also collaborate with business teams to conduct targeted assessments, help suppliers mitigate risks in specific operational contexts, and incorporate the unique vulnerabilities of certain populations in our risk models and programs. Additionally, we began experimenting with AI/ML to help transform large amounts of data into actionable insights, enabling more effective risk assessment and decision-making across our complex supplier network, maintaining human oversight, and leveraging our team’s deep human rights expertise.

¹⁰ Saliency assessments help us identify and prioritize the most severe business-related risks; human rights impact assessments (HRIAs) examine specific business segments, products, countries of operation or sourcing, potentially affected groups, or other risk areas; and due diligence assessments evaluate our internal capacity to assess and address human rights risks.

Prioritizing Risk

Based on our risk assessment findings, we evaluate and prioritize our efforts to address both site-specific challenges and broader, systemic issues. We develop regional and country-level strategies tailored to specific social, cultural, economic, and regulatory contexts and have ongoing due diligence in place.

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. Where Better Work is unavailable in a higher-risk country or not applicable to a product category, we require participation in an Amazon-managed audit and Amazon’s advisory services, a tailored supplier-level intervention with enhanced oversight to improve working conditions and maintain continuous improvement.

As part of our risk prioritization efforts, we strengthened our oversight of migrant workers’ recruitment processes globally. In the Gulf Region, for example, we connected suppliers with reputed recruitment agencies that are known to practice responsible recruitment to promote the “employer pays principle” in hiring practices. These agencies have a reputation to not charge fees to job seekers to obtain a position; all recruitment and placement costs, such as visa processing, travel expenses, medical examinations and administrative fees, are paid by the suppliers (i.e., the workers’ employers).

For more information, please see our most recent [Sustainability Report](#).



Addressing Risk

Our approach to addressing modern slavery risk focuses on the detection of potential exploitation across our operations and supply chain, enabling targeted prevention and remediation.

Issue Detection

While our risk assessments help us understand where modern slavery might occur, we employ multiple detection tools to identify potential risks and nonconformances. In our operations, these include employee grievance mechanisms and internal compliance monitoring. In our supply chains, we use audit programs, supplier assessments, and technology solutions. In 2025, we developed a generative AI tool to review audit reports, identify risks, and check them against our Supply Chain Standards, rating priority and suggesting next steps.

Audit Programs and Supply Chain Transparency

Amazon audits suppliers globally to evaluate their compliance with our Supply Chain Standards, including suppliers that manufacture Amazon-branded products, as well as service providers (e.g., staffing agencies, janitorial companies) and suppliers of not-for-resale goods used in our operations. Audits are an important due diligence tool that helps us direct our efforts and resources and detect issues before and during our relationship with suppliers, allowing us to work together on remediation, when appropriate. 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), the Social & Labor Convergence Program (SLCP), and the Better Work program.

We use a combination of systematic and risk-based approaches, including consultation with internal and external stakeholders, evaluation of country- and industry-level risks, and periodic site-level risk assessments. We also regularly consult industry experts globally to review our approach to risk assessment across both product manufacturing and operations (including logistics, warehousing, construction, and service providers), maintaining alignment with evolving international standards and best practices. Examples of components of our audit process include site inspections, confidential worker interviews or surveys, and reviews of site documents and licenses.

Our audits assess modern slavery indicators,

including inadequate communication of employment terms; lack of clear documentation in each worker's native or best understood language; insufficient overtime notice; and improper document retention. We also monitor restricted worker movement and debt bondage indicators like worker-paid recruitment fees, holding of employee passports, or mandatory overtime at suppliers' sites. When findings require deeper investigation, we engage Amazon teams or third-party experts for additional assessments.

In 2025, Amazon collaborated with Sedex to develop an innovative audit methodology for service providers, including transportation operators and on-site service providers such as cleaning, security, and catering. Before our partnership with Sedex, there was no standardized full-scope industry association social audit for service providers. Through our participation in methodology development and feasibility testing, we worked with Sedex to expand their audit protocols to encompass a broader range of service sector workforce models. Using these specialized protocols, we conducted pilots and scaled our expanded supplier audit program across service providers supporting our global operations and our global logistics network. Our expanded program demonstrates our ongoing commitment to incorporating human rights risk mitigation across our business operations. These audits have contributed to overall improvement in supply chain compliance through identification of non-conformances and implementation of remediation measures, enhancing the social health of our supply chain.

We report supplier audit data annually in our Sustainability Report, including findings on high- and medium-severity issues. For suppliers manufacturing Amazon-branded products, audits are conducted as outlined in our [Supply Chain Standards Manual](#). For service providers and suppliers of not-for-resale goods, we apply tailored audit protocols aligned with our [Supply Chain Standards](#).

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**Table 1: 2023, 2024, and 2025 relevant audit findings¹¹**

Audit findings¹²	% of audits where issue was found		
	2023	2024	2025
Incomplete employment information Employment documentation did not include relevant information on the nature of work, working hours, wages, leave, benefits, fees, or deductions	3.4%	4.9%	<1%
Ineffectively communicated employment information Employment documentation was not communicated in the worker's native or best understood language or changes in terms of employment were not declared or were not negotiated	5.4%	8.4%	1.77%
Mandatory overtime Workers were not provided sufficient notice of overtime in advance or were unable to refuse overtime without penalty, against international standards	1.9%	2.2%	<1%
Worker-paid recruitment fees Fees related to recruiting and hiring were not disclosed in advance or not reimbursed	2.1%	2.1%	<1%
Document Retention Employers maintain possession or control over worker identity documents	<1%	<1%	<1%

¹¹ Using a risk-based approach, audits were conducted for suppliers that manufactured products that are Amazon-branded and who provided services (e.g., staffing agencies, janitorial companies, security, and maintenance staff) or not-for-resale goods in our operations.

¹² Data for 2023 represents findings from audits of Amazon-branded product suppliers only. 2024 and 2025 data has an expanded scope that includes both Amazon-branded product suppliers and Amazon's own operations as noted.

We prioritize transparency in our supply chain to further enhance detection. Our supplier list and interactive supply chain map provide details on finished-product suppliers of Amazon-branded apparel, consumer electronics, food and beverage, and home goods products, providing customers and external stakeholders visibility into where we source. We have been working toward greater visibility in upstream supply chain transparency through continued partnership with [Open Supply Hub](#), a collaborative supply chain mapping platform used and populated by stakeholders across sectors and supply chains. Sharing this information allows users to have a transparent and accurate view into this portion of Amazon's supply chain and serves as a valuable tool to detect risks and identify opportunities for brand collaboration and action in the industry.

Grievance Mechanisms

We welcome anyone—including employees, contractors, suppliers, customers, and community members—to share concerns related to Amazon's business or supply chain directly with us through our [Human Rights and Environmental Complaints](#)

[Procedure](#). This procedure allows for anonymous submissions, is available in 19 languages and dialects, and can be accessed globally. Amazon also empowers and encourages our employees to share their concerns and communicate candidly with us through multiple communication channels. These include grievance mechanisms and avenues for two-way dialogue with leadership through platforms like Amazon's Ethics Line, MyHR, and MyVoice—Amazon's primary Voice of Associate platform. We regularly conduct associate roundtables throughout our global operations to assess awareness of and access to these grievance mechanisms, identifying and addressing any potential barriers to their use.

Beyond our employees, we want all workers in our supply chain to have the ability to voice their concerns in a safe and confidential manner—whether directly to us, through supplier-managed grievance mechanisms that we support, or by connecting our suppliers to third-party grievance mechanisms.

We support suppliers in developing and improving their internal grievance systems through training,



case management assistance, and process improvement guidance. We connect suppliers and service providers with trusted tools, products, and systems to hear directly from workers about their experiences and support the resolution of issues from workers' perspectives. In 2025, we collaborated with JP-MIRAI to implement worker voice mechanisms in our Japan supply chain. This initiative provided workers with secure channels to report workplace concerns, particularly regarding recruitment practices and labor rights. This initiative connects with Amazon's continued support to JP-MIRAI's fair and ethical recruitment initiative, which addresses recruitment corridor challenges in Bangladesh, Indonesia, and Nepal, primary countries of origin for migrant workers in Japan.

Through our collaboration with Ulula, an EcoVadis company, we were able to expand our worker voice program, including worker surveys and a helpline to include Vietnam, joining Cambodia, China, India, and Pakistan. Additionally, in 2025, Amazon began working with the Hamary Awaz Helpline in Pakistan, a confidential platform designed for reporting and resolving workplace concerns. In Bangladesh, we work with Amader Kotha Helpline, which is a partner of Nirapon, an industry-led nonprofit that works with global brands, retailers, manufacturers, and other NGOs to build a culture of workplace safety in factories. In the United States, we began connecting supplier sites with Dignia, an industry grievance mechanism that provides workers with a confidential, independent channel to raise concerns.

Technology Solutions and Strategic Partnerships

To complement our audit programs and grievance mechanisms, we leverage advanced technology and strategic partnerships to enhance our detection capabilities. Throughout this process, we maintain human oversight and subject matter expert review of all AI-driven systems used in our human rights due diligence processes to facilitate accuracy, appropriate application of our standards, and alignment with human rights principles. These technological innovations complement our existing detection and prevention framework, strengthening our ability to identify and address potential indicators of forced labor and modern slavery quickly and efficiently across our global operations.

Our customers continue using AWS technology in their fight against modern slavery and child exploitation through advanced cloud solutions. In 2025, we strengthened our partnerships with key organizations dedicated to child protection and anti-trafficking efforts.

Our collaboration with Thorn, a nonprofit organization that builds technology to combat child sexual abuse, expanded in 2025 with over one million dollars in AWS credit support. Thorn's Safer is a tool that leverages advanced AI and machine learning capabilities to help content-hosting platforms and companies identify, review, and report child sexual abuse material (CSAM) and conversations leading to child sexual exploitation. While Safer primarily focuses on CSAM detection, its technology also aids in identifying potential grooming or exploitation conversations. We make Thorn's Safer technology available to businesses via the AWS Marketplace so they can proactively identify and address CSAM.

In the United States, we strengthened our partnership with the National Center for Missing & Exploited Children (NCMEC) in 2025, providing over one million dollars in AWS credits to support their mission-critical applications. NCMEC's mission is to help find missing children, reduce child sexual exploitation, and prevent child victimization. Through Amazon's subsidiary Ring, NCMEC distributes geo-targeted missing child posters via the Ring Neighbors app and across social media platforms, enabling communities to share vital information with law enforcement. NCMEC's CyberTipline and educational resources, powered by AWS infrastructure, continue to play a crucial role in identifying and preventing online exploitation. Amazon serves on NCMEC's Board of Directors, demonstrating our comprehensive approach to child safety initiatives.

Prevention

Supply Chain Standards Implementation

An important component of prevention is raising awareness of risks. We promote awareness and support implementation of our Supply Chain Standards through dedicated teams in key sourcing regions that work directly with suppliers; these teams support suppliers in developing necessary management systems for meeting and exceeding our Standards.

Supply Chain Risk Management: Responsible Commodities 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.

To address the complexity and fragmentation of commodity supply chains, we continue to deepen



We extend our Supply Chain Standards to selling partners by incorporating them into our business relationships. Selling partners who register for or use Amazon services (including Selling on Amazon, Fulfillment by Amazon, Amazon Advertising, Transaction Processing Services, and the Selling Partner API) agree to either the Amazon Services Business Solutions Agreement or their applicable Vendor Terms & Conditions, both of which include adherence to Amazon's Supply Chain Standards.

We evaluate allegations of selling partners' 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.

our due diligence beyond our direct suppliers. Improved visibility into raw materials enables better identification of human rights and labor rights violations and strengthens supplier accountability.

Our responsible minerals program is a key component of this effort, addressing supply chains with higher modern slavery risks through human rights and environmental due diligence on high-risk minerals, including tin, tungsten, tantalum, gold, and cobalt. Amazon does not engage in direct sourcing from mine sites and smelters, and we are committed to avoiding the use of minerals that have fueled conflict. We encourage our suppliers to support our efforts 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.

In 2025, we implemented expanded due diligence for additional minerals (lithium, nickel, and graphite), which carry risk of forced labor in their supply chains. We applied our existing responsible minerals framework to these additional minerals by engaging suppliers to collect data on mineral sourcing through industry-standard reporting templates, analyzing the source and chain of custody, and encouraging suppliers to source from smelters and refiners that have successfully completed recognized third-party responsible minerals audits. To promote responsible mineral sourcing and industry collaboration, we maintain active memberships and partnerships with the Responsible Minerals Initiative, the Copper Mark, and the Public-Private Alliance for Responsible Minerals Trade. Through these engagements, we collaborate with industry peers, governments, and civil society actors to increase supply chain transparency and improve sourcing across mineral

value chains.

In 2025, Amazon continued supporting the Responsible Sourcing Network's initiative YESS™: Yarn Ethically & Sustainably Sourced. YESS is a multi-stakeholder initiative that brings together brands, retailers, suppliers, NGOs, and industry experts to implement risk-based due diligence on cotton sourcing. Through this collaboration, we worked with fabric and spinning mills to implement risk-based due diligence on cotton sourcing to help prevent and mitigate forced labor in cotton production.

For more information on our responsible sourcing practices, please see our most recent [Sustainability Report](#).

Whole Foods Market: Responsible Sourcing Programs

Whole Foods Market's Sourced for Good program labels produces meeting third-party social and environmental standards. The program partners with farms and producers to ensure full supply chain visibility and commitment to worker rights and good labor practices through certifications including Fair Trade USA, Rainforest Alliance, Fair Trade America, the Fair Food Program, the Equitable Food Initiative, and Regenerative Organic Certified. The program covers more than 100 producers across 17 countries.

Additionally, all 365 by Whole Foods Market chocolate products (bars, chips, and baking chocolate) are Fair Trade USA or Fairtrade International certified. All 365 by Whole Foods Market tea is certified by Fair Trade USA or Rainforest Alliance, and all 365 packaged coffee is certified by Rainforest Alliance, Fair Trade USA, or Fairtrade International.



Worker Protection: Responsible Recruitment Practices

Amazon is committed to addressing deceptive recruitment practices and worker-paid recruitment fees, which are considered key indicators of modern slavery. Our interventions focus on increasing visibility into supplier and employment agency recruitment practices to help prevent forced labor in Amazon's supply chain. Through enhanced due diligence and partnerships, we have deepened our understanding of recruitment practices across regions and industries, highlighting root causes of risks especially in origin and destination countries for migrant workers.

Amazon's Supply Chain Standards prohibit charging workers recruitment fees. When worker-paid recruitment fees are discovered, we guide suppliers to implement remediation plans that safely reimburse workers and help them develop management systems to prevent future recruitment fees throughout their hiring processes. Our responsible recruitment initiatives focus on six core areas: awareness raising; specialized training; case management support; risk assessment and mitigation toolkits; transparent data, analysis, and reporting; and partnerships. In 2025, we strengthened our responsible recruitment initiatives through our Global Framework Agreement with the International Organization for Migration (IOM). This strategic collaboration leverages Amazon's scale and IOM's expertise to develop data-driven tools, supplier training, and risk mapping capabilities. Through this collaboration, we work to advance our suppliers' and business partners' respect for migrant workers' rights and improve safe labor migration and socio-economic inclusion. Amazon and IOM focus on human rights due diligence, mapping labor migration processes across relevant corridors, building capacity of suppliers in countries of origin and destination, and engaging in multi-stakeholder initiatives to drive positive change across relevant industries. As part of this collaboration, we launched a year-long initiative with IOM Nepal in April 2025 focused on protecting migrant workers' rights through multi-stakeholder dialogue, awareness campaigns, and ethical recruitment capacity building.

To strengthen prevention efforts, we offer suppliers on-site and remote support to help them understand Amazon requirements, navigate corrective action plans, and implement more sustainable management systems for supply chain monitoring. We encourage supplier participation in external training programs and provide recruitment training resources. We help suppliers establish data collection mechanisms to track progress and enable timely responses to emerging

risks. Additionally, we offer suppliers comprehensive assessment and mitigation toolkits to identify potential issues before audits, enabling early remediation.

Capability Building and Training

As a global company employing over one million workers around the world, we recognize our responsibility and opportunity to raise awareness of human rights issues among our employees and collaborators as well as our suppliers.

In 2025, we expanded our training and capacity building initiatives across multiple areas. We developed 15 new eLearning resources and updated 31 existing modules and supplier-facing documents in multiple languages. In 2025, our internal e-learning programs reached 68,000 Amazon employees on topics including human rights due diligence, responsible sourcing, and Supply Chain Standards compliance. Our modern slavery training, available to employees in seven languages and customized by region, builds awareness on how to recognize modern slavery indicators in the workplace, or that an employee might encounter while on the job, and report concerns to appropriate authorities.

For our suppliers, we provided training to 2,500 suppliers through e-learning platforms and hosted 24 in-person workshops across 13 countries, engaging participants from 253 suppliers worldwide. These workshops provided hands-on training on Amazon's Supply Chain Standards, responsible recruitment practices, and management systems development. Additionally, we made 38 third-party online training courses covering 14 human rights topics, such as responsible recruitment, forced labor, occupational health and safety, fair wages, and working hours, accessible for Amazon businesses to offer to their suppliers.

As a corporate sponsor of TAT (formerly Truckers Against Trafficking), we support its mission to educate, equip, empower, and mobilize members of key industries and agencies to combat human trafficking. Through TAT training modules, we have equipped more than 18,000 active Amazon transportation associates to identify and respond to potential instances of human trafficking they might witness while on the road, including both sex trafficking and forced labor. In 2025, over 12,700 Amazon employees completed TAT training, equipping them with skills to recognize and report potential instances of human trafficking.

In 2025, we expanded our supplier capability building by integrating human rights-related



programs, content, and e-learning resources through the [Amazon Sustainability Exchange](#)—a free, publicly available website offering information to help other companies seeking to make progress towards their sustainability goals. Through the Exchange, we added resources from 18 third parties, including the ILO's Sustaining and Competitive Responsible Enterprises, Ulula, Japan Platform for Migrant Workers towards Responsible and Inclusive Society (JP-MIRAI), and others. This provides suppliers with streamlined access to human rights training materials and demonstrates our commitment to industry-wide knowledge sharing, case studies that showcase how others are implementing more sustainable practices across their operations, and resources and tools to empower businesses to take action.

Strategic Partnerships and Collaboration

To enhance our prevention efforts, we engage in strategic partnerships and collaborations across the industry. In 2025, we strengthened and expanded our strategic partnerships to advance our efforts to prevent modern slavery.

Our partnership with the IOM, mentioned in the previous section, demonstrates progress through targeted regional initiatives to strengthen responsible recruitment and protect migrant workers. In 2025, we also joined the World Economic Forum's Global Data Partnership Against Forced Labor, a collaborative initiative creating secure data-sharing infrastructure to enable businesses, NGOs, and governments to access AI-driven insights for corporate due diligence, victim identification, and law enforcement purposes in combating forced labor. As a member of Business for Social Responsibility (BSR), a sustainable business network focused on creating a world in which all people can thrive on a healthy planet, we participate in key multistakeholder initiatives including Tech Against Trafficking (TAT), Global Business Coalition Against Trafficking, and the Human Rights Working Group. Through our TAT steering committee role, we collaborate with companies and global experts to eradicate human trafficking using technology.

In 2025, we funded research through the TAT coalition that resulted in the publication of [Standardizing Data Collection on Forced Labor](#). This benchmark analyzes how companies collect forced labor data indicators and identify opportunities for greater standardization. The work represents a multi-stakeholder process led by BSR, involving technology companies, corporate suppliers, supply chain data providers, civil society leaders, and individuals with lived experience. TAT continues to develop cross-industry forced labor data standards to define key terms, streamline

data points, and set thresholds that trigger further human rights due diligence.

Amazon Grocery, along with Mars, Inc., participated in the development of the Responsible Labor Initiative's (RLI) Food and Beverage Workgroup, a new industry group focused on shared human rights risks across food and beverage supply chains. Amazon participates in leadership capacities within both the RLI and the Responsible Business Alliance (RBA). The RLI is a multi-industry, multi-stakeholder initiative focused on helping to ensure that the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted.

The RLI is hosted by the RBA, a non-profit coalition of companies committed to supporting the rights and well-being of workers and communities worldwide affected by global supply chains. The RBA provides multiple initiatives focused on forced labor, including their audit protocol and their Specialty Validated Assessment Program (SVAP) on Forced Labor. We accept RBA Validated Assessment Program (VAP) audits as part of our supplier due diligence program. Through our leadership participation in both organizations, we collaborate with industry peers to advance responsible labor practices and strengthen protections for vulnerable workers across global supply chains.

We also continued our collaboration with The Centre for Child Rights and Business to address root causes of child labor in the food and beverage industry. Through this collaboration, we developed tools and training materials that can be replicated across the manufacturing sector, demonstrating our support to scalable approaches and long-term solutions for preventing child labor risks beyond our own supply chain.

Remediation

When we identify gaps between a supplier's practices and our Supply Chain Standards, including indicators of modern slavery such as worker-paid recruitment fees, document retention, restrictions on freedom of movement, or other forced labor risks, we track remediation and conduct follow-up assessments as needed. Our central human rights team engages directly with suppliers on open issues and remediation progress and provides them with issue-specific guidebooks.

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.



We categorize audit findings as high, medium, or low severity. A high-severity finding is an issue that has caused, or is likely to cause, immediate harm to workers, communities, or the environment, or that involves egregious unethical behavior. A medium-severity finding is an issue that poses significant risk of harm to workers or communities or demonstrates exploitative practices. When high-severity issues are identified, suppliers must develop corrective action plans to address identified issues and complete remediation measures to prevent recurrence. Suppliers with high-severity findings are also subject to follow-up audits to confirm sufficient remediation. For medium-severity issues, we track and confirm progress toward resolution through corrective action plans. We monitor low-severity issues for continuous improvement through maintenance audits.

When issues arise, we provide suppliers with dedicated case management support and guidebooks containing remediation resources. For example, one of our guidebooks provides suppliers with direction 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 employment terms language and guidance on preventing and remediating the improper retention of identity documents. We believe that equipping suppliers

with appropriate tools and strategies enables effective risk management in their supply chains.

Remediation can be complex and resource-intensive, particularly when addressing worker-paid recruitment fees. The financial scope of reimbursement requires intensive investigation to detect affected workers and careful coordination to facilitate timely repayment. Additionally, in countries where recruitment fees are legally permitted, culturally accepted, or part of government programs, remediation requires not only reimbursing affected workers but also working with suppliers to establish alternative recruitment pathways, connecting them with zero-fee recruitment agencies, and exploring ways to work with governments and other external partners to advocate for policy changes that align with our Supply Chain Standards and internationally recognized human rights.

We prioritize issue remediation first, working with suppliers to fix issues and make workers whole wherever possible, and disengage from a supplier only as a last resort. We recognize that terminating business with a supplier can remove the incentive for improvement and have a detrimental effect on workers and communities.

The following cases illustrate how we put our remediation principles into practice across different contexts and regions.

Case Study: Ethical Recruitment Initiative in Japan's Migrant Workforce

In 2025, Amazon implemented a responsible recruitment initiative in Japan that included direct supplier engagement and education initiatives. We conducted in-person training sessions with suppliers across Japan, increasing awareness on employer-pay practices while covering broader human rights topics including health and safety standards and working hours compliance. This targeted intervention connected Amazon with multiple suppliers, implementing partners, and recruitment agencies to increase protections for migrant workers who may be vulnerable to recruitment fees and other indicators of forced labor.

Following a detailed assessment of recruitment practices and fee structures, we focused on efforts to create improvements in the recruitment process, including establishing zero-fee recruitment protocols, implementing fee reimbursement programs, and enhancing monitoring of working conditions. Through sustained collaboration with suppliers, the initiative resulted in the reimbursement of recruitment fees to over 200 workers and the development of preventive measures and sustainable solutions for worker protection.

Case Study: Amazon Fulfillment Operations in Saudi Arabia

In 2023, Amazon identified nonconformances with our Supply Chain Standards through an independent audit of a third-party licensed temporary labor agency providing contract workers to support Amazon fulfillment, sortation, and delivery operations in Saudi Arabia. The nonconformances included recruitment fees paid by migrant workers, absence of grievance mechanisms, and issues with worker accommodation. In response, we launched a remediation program and implemented structural reforms to help prevent future recurrence.



In 2025, we completed a second phase of recruitment fee reimbursement for workers who returned to their home countries and were no longer part of the supply chain. Through outreach efforts, we identified and reimbursed 146 additional workers, returning \$340,632 in recruitment fees and related costs. Combined with earlier efforts, we have reimbursed a total of 847 contracted workers over \$2.2 million. While Amazon requires our vendors to bear the cost of worker-paid recruitment fees, in this case, Amazon provided the reimbursement to expedite repayment to workers impacted.

Beyond reimbursement, we implemented structural improvements to help enhance worker wellbeing and help prevent future nonconformances across our fulfillment, sortation and delivery operations in Saudi Arabia and neighboring United Arab Emirates. In Saudi Arabia, we connected fulfillment operations suppliers with zero-fee agencies to promote the employer-pays recruitment principle in hiring practices. To strengthen worker voice, we expanded confidential reporting channels, providing more than 9,000 third-party workers with direct mechanisms to raise concerns with Amazon operations teams. We also invested in education and awareness, providing practical training on Amazon's Supply Chain Standards to workforce staffing agencies supporting these operations in the region, clarifying expectations around responsible recruitment, wage policies, and worker protections. Additionally, we launched targeted anti-harassment campaigns reaching more than 39,000 workers and 1,200 leaders to promote respectful and inclusive workplaces for women in traditionally male-dominated operations.

The learnings from these measures have informed our approach to migrant worker protection globally, strengthening responsible recruitment practices, enhancing worker voice mechanisms, and improving vendor oversight across Amazon's worldwide operations supply chain.

Monitoring Effectiveness and Impact

Our commitment to addressing modern slavery risks requires ongoing assessment of our efforts' effectiveness and impact through comprehensive monitoring and evaluation systems.

We monitor audit results and remediation measures to evaluate effectiveness and improve our due diligence mechanisms. Through new mechanisms, technology solutions, and pilot programs, we better identify and address risks while positively impacting the well-being of workers.

Our key performance indicators measure both the implementation and impact of our programs. We analyze completion rates of supplier audits against annual targets, monitor remediation timelines for identified issues, and measure supplier participation in capacity-building initiatives. We strengthened our data analytics capabilities to better monitor global patterns and any emerging risks.

Worker feedback remains central through our grievance mechanisms and feedback channels, where we monitor resolution rates, response times, and overall satisfaction levels. Our [Human Rights and Environmental Complaints Procedure](#), which allows all individuals and workers in our supply chain to notify us about potential concerns about a human rights and environmental issue related to Amazon's business or supply chain, strengthens our ability to address concerns from across our operations and supply chain. In addition, our

central team analyzes trends to inform program improvements.

We maintain our commitment to understanding and addressing modern slavery risks that may arise in the course of our business. Recognizing that systemic issues require collective action, we partner with governments, international organizations, private sector, and civil society to refine programs, enhance supplier capacity, and build strategic partnerships that address human rights risks through sustained cross-industry efforts.

Looking ahead, we will strengthen our commitments by regularly updating our policies and assessment processes, growing our partnerships, enhancing our training and capacity-building programs, and improving our supply chain due diligence efforts.

While proud of our progress to further respect and advance human rights and address modern slavery risks throughout our business, we remain focused on scaling our initiatives, data-driven decision making, and engaging company-wide to address these challenges effectively.



Approval and Signature

Amazon's global policies, practices, and procedures to assess and address modern slavery risks are implemented with attention to the local contexts and specific regional needs, in consultation with all reporting entities and their subsidiaries. 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. The team works closely and on an ongoing basis with Amazon entities worldwide to identify risks, implement preventive measures, and monitor our approach to combating modern slavery.

This annual Statement was developed through consultation with subject matter experts and key stakeholders across Amazon's global operations. The process included engagement with functions across regulated jurisdictions, ongoing discussion of reporting requirements, and regular presentation of relevant materials and updates.

The Statement underwent review by cross-functional stakeholders, including representatives from global and local legal, public policy, sustainability, and supply chain teams, as well as directors from each reporting entity.

This Statement was approved by the Board of Directors of Amazon Europe Core SARL and covers all activities undertaken by Amazon's U.K. Entities.

Amazon Europe Core SARL

John Boumphrey,
UK Country Manager, 2026

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

Matt Benham,
AU Country Manager, 2026

This Statement was approved by Amazon Web Services EMEA SARL and covers all activities undertaken by Amazon's Web Service's Norway Branch.

Amazon Web Services EMEA SARL

Kristoffer Brandt,
AWS Norway Country Manager, AWS Norway,
2026

This Statement was approved by the Board of Directors of Amazon.com.ca ULC pursuant to Section 11(4)(a) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act.

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

Kevin Grimes
Director, 2026

I attest that I have reviewed the information contained in the report for Whole Foods Market Canada, Inc. and Whole Foods Market WO-Inc. 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 2025 reporting year.

I have the authority to bind the above entities. For clarity, this attestation is provided in my capacity as director of Fresh & Wild Ltd., and Assistant Secretary of Whole Foods Market Canada, Inc. and Whole Foods Market WO-Inc., only, and not in my personal capacity

Allen Culp
Director, 2026



Appendix – 2025 Norway Transparency Act Report

1. Introduction

The Norway Transparency Act (“Transparency Act”) applies to Amazon Web Services EMEA SARL (“AWS EMEA”)’s sales and marketing branch in Norway (“AWS Norway”). As used in this Statement, “Amazon” refers collectively to Amazon and its business segments, including AWS Norway. For the purposes of the Transparency Act, the Statement, read in conjunction with this Appendix, is made on behalf of AWS Norway.

2. AWS Norway Business Structure, Operations, Policies and Governance

2.1 Structure and 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.

2.2 Guidelines, Policies, and Procedures

AWS Norway is committed to operating in compliance with all applicable laws and regulations, including the Transparency Act, and upholding Amazon’s global policies, including Amazon’s [Code of Business Conduct and Ethics](#), [Global Human Rights Principles](#), and [Supply Chain Standards](#), which help ensure the people and communities that support our operations and supply chain are treated with fundamental dignity and respect.

2.3 Due Diligence Process

The Statement details Amazon’s human rights due diligence process. Amazon works to identify, assess, and prioritize the most salient risks in line with the UN Guiding Principles on Business and Human Rights, the UN Universal Declaration on Human Rights, the core Conventions of the ILO, and the ILO Declaration on Fundamental Principles and Rights at Work.

AWS Norway conducts due diligence assessments of its own operations, suppliers, and business partners. This due diligence is proportionate and right-sized to the nature and context of its business operations.

3. Due Diligence of AWS Norway

In the context of AWS Norway, suppliers consist of professional service providers, such as 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. AWS Norway expects suppliers to hold their subcontractors and labor agents to the standards and practices covered by Amazon’s Supply Chain Standards.

4. Results and Measures

During 2025, based on factors including: (i) suppliers’ sectors (professional services such as public relations, accounting and legal services, pension and insurance, human resources, and facilities management); (ii) worker classification (largely skilled professionals); and (iii) geography (Western Europe and United States), AWS Norway concluded there is low risk for violations of human rights or decent working conditions in our supply chain. While we have not seen any indications that our risk level has changed, 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.