

# **Modern Slavery Statement 2024**

**Amazon**





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## 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")<sup>1</sup> from January 1, 2024 to December 31, 2024.<sup>2</sup> It has been prepared in compliance with the requirements of the [Australia Modern Slavery Act 2018](#),<sup>3</sup> the [California Transparency in Supply Chains Act](#), [Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act](#),<sup>4</sup> [Norway's Transparency Act](#), and the [United Kingdom Modern Slavery Act 2015](#).<sup>5</sup>

Our Global Human Rights Principles demonstrate our commitment to respecting the fundamental dignity of people throughout our entire value chain.

In accordance with internationally recognized human rights standards, this Statement defines modern slavery as child labor, involuntary or forced labor, and human trafficking in any form—including slave labor, involuntary or exploitative prison labor, indentured servitude, or bonded labor. We do not tolerate any form of modern slavery.

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.

In 2024, 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 trainings, workshops, and resources to drive their 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 risks 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 enhanced industry partnerships, we continued developing best practices to address modern slavery risks.

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

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

<sup>2</sup> Metrics contained herein cover 2024 activities, unless otherwise indicated.

<sup>3</sup> The Australian subsidiaries that are required to report under the Modern Slavery Act 2018 for 2024 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.

<sup>4</sup> The Canadian subsidiary covered by this Statement is Amazon.com.ca ULC.

<sup>5</sup> The UK subsidiary covered by this Statement is Amazon UK Services Ltd. Registered in England and Wales with registration number 03223028 with its registered office at 1 Principal Place, Worship Street, London, EC2A 2FA, United Kingdom.



## 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 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.<sup>6</sup> We design our stores to enable hundreds of millions of unique products to be sold by us and by third parties across dozens of product categories. Customers access our offerings through our websites, mobile apps, Alexa, devices, and streaming, and by physically visiting our stores. We also manufacture and sell electronic devices, and we develop and produce media content. In addition, we offer subscrip-

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

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

We serve developers and enterprises of all sizes, including start-ups, government agencies, and academic institutions through AWS, which offers a broad set of on-demand technology services, including compute, storage, database, analytics, machine learning, and other services. We offer programs that allow authors, independent publishers, musicians, filmmakers, Twitch streamers, skill and app developers, and others to publish and sell content. We provide advertising services to sellers, vendors, publishers, authors, and others, through programs such as sponsored ads, display, and video advertising.

With operations and supply chains spanning the globe, 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 embeds respect for human rights throughout our business activities, including into 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 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

<sup>6</sup> In 2024, applicable subsidiaries operated physical stores in the UK and the US.



and engagement with customers, suppliers, and communities.

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.<sup>7</sup>

Our Global Human Rights Principles 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](#), 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 thereafter. Amazon provides its employees 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 Business Conduct and Ethics, and ask questions about potentially unethical conduct through Amazon's Ethics Line. We prohibit retaliation for making complaints and take all allegations seriously.

Our [Supply Chain Standards](#), available in 23 languages, are the backbone to our efforts to enable a responsible supply chain. They apply to suppliers of goods and services for Amazon and its subsidiaries, including providers, vendors, selling partners,<sup>8</sup> contractors, and subcontractors (collectively "suppliers"). 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 these Standards, and to work with them to adopt and raise awareness of these 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.

## **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.

<sup>7</sup> Our Global Human Rights Principles, last updated in 2025, are reviewed at least every five years, and our Supply Chain Standards, last updated in 2022, are reviewed at least every three years.

<sup>8</sup> Selling partners are retail vendors and third-party sellers that sell or supply products and services in Amazon's stores.



## Assessing Risk

Our risk assessment process focuses on identifying and prioritizing risks of modern slavery within our operations and supply chains, helping us identify vulnerabilities, mitigate risks, and make informed decisions.

Amazon's centralized 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, takes action to address and mitigate identified risks, measures progress, and remediates 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 region-specific risks including large populations of migrant workers, varying labor standards and enforcement, and well-documented modern slavery prevalence. To complement this, we partner with modern slavery experts and non-governmental organizations, 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.<sup>9</sup> These assessments help us identify salient risks, build capacity and business-level ownership, and conduct targeted human rights and environmental due diligence to monitor and manage compliance. We collaborate with business teams to enable targeted assessment and mitigation of risks in specific operational contexts.

While modern slavery can impact any population, we recognize that certain groups may be disproportionately impacted by issues addressed in our Supply Chain Standards and may be more vulnerable to exploitation and other human rights and environmental impacts, including: domestic and foreign migrant workers; contract, agency, and temporary workers; refugees, asylum seekers, ethnic/religious minorities and displaced persons; young or student

<sup>9</sup> 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.

workers; indigenous peoples; women; and children. We work to ensure an appreciation for the unique vulnerabilities of these populations are built into our risk models and programs.

### Prioritizing Risk

Based on our identification and 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, in 2024, we collaborated with The Centre for Child Rights and Business to conduct child labor risk assessments for strategic suppliers in the United States, develop risk management tools and training materials that reached hundreds of suppliers, and engage with stakeholders including business representatives, NGOs, and workers to strengthen our child labor prevention framework.

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 providing remediation strategies.

### Detection

Our risk management program focuses on issue detection at the site level. Although assessing risks helps us understand where modern slavery might occur, we also employ multiple detection tools across our operations and supply chains, including audit programs, grievance mechanisms, and technology solutions, to actively monitor for cases requiring





intervention.

### **Audit Programs and Supply Chain Transparency**

Audits are an important due diligence tool that help us direct our efforts and resources. Audits help us detect issues before we engage with suppliers 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), Social & Labor Convergence Program (SLCP), and the Better Work program.

Examples of our audit process involve site inspections, confidential worker interviews or surveys, and reviews of site documents and licenses. Our audits assess modern slavery indicators, including: inadequate employment term communication; lack of clear documentation in each worker's native or best understood language; insufficient overtime notice; and improper document retention. We also monitor for restricted worker movement and debt bondage indicators like recruitment fees or mandatory overtime at suppliers' sites. When findings require deeper investigation, we engage Amazon teams or third-party experts for additional assessments.

We use a risk-based approach to audit suppliers that manufacture Amazon-branded products and those who provide services (e.g., staffing agencies, janitorial companies) or not-for-resale goods in our operations globally to evaluate their compliance with our Supply Chain Standards. When we assess either our operations' non-inventory products and services or our Amazon-branded products,<sup>10</sup> we engage with internal and external stakeholders, evaluate country- and industry-level risks, and conduct regular site-level risk assessments. For our Amazon-branded products, we also regularly consult industry experts globally to review our approach to risk assessment and maintain alignment with evolving international standards and best practices.

In 2024, we strengthened our global human rights risk management by expanding our supplier audit program to reach more of Amazon's global logistics network. While our audits have traditionally focused on Amazon-branded product suppliers, we recognize

risks to workers exist throughout our supply chain. By broadening our scope to include third-party labor, service, and not-for-resale goods providers in our logistics, warehousing, and construction supply chain, we demonstrate our commitment to incorporating human rights risk mitigation in our logistics business strategy and decision-making. Given the scale and complexity of our global logistics supply chain, we began by auditing suppliers operating within our facilities, building upon our established processes and tools. Over the next several years, we plan to expand these audits to our global transportation supply chain, developing approaches tailored to different businesses and supplier categories to enhance our assessment of third-party service providers' compliance with Amazon's Supply Chain Standards.

We report supplier audit data annually in our Sustainability Report, including findings on high- and medium-level issues. For Amazon-branded products, we conduct supplier audits as outlined in our [Supplier Manual](#).

*Continued on next page.*

<sup>10</sup> Amazon-branded products are apparel, consumer electronics, food and beverage, and home good products such as Amazon Basics, Amazon Devices (e.g., Kindle, Fire TV, Echo) or other private labels owned by Amazon. This includes any product manufactured or co-manufactured by Amazon, including its subsidiaries.

**Table 1: 2022, 2023, and 2024 relevant audit findings<sup>11</sup>**

<b>Audit findings<sup>12</sup></b>	<b>% of audits where issue was found</b>		
	<b>2022</b>	<b>2023</b>	<b>2024</b>
<b>Incomplete employment information</b> Employment documentation did not include relevant information on the nature of work, working hours, wages, leave, benefits, fees, or deductions	3.7%	3.4%	<b>4.9%</b>
<b>Ineffectively communicated employment information</b> 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	2.4%	5.4%	<b>8.4%</b>
<b>Mandatory overtime</b> Workers were not provided sufficient notice of overtime in advance or were unable to refuse overtime without penalty, against international standards	1.6%	1.9%	<b>2.2%</b>
<b>Worker-paid recruitment fees</b> Fees related to recruiting and hiring were not disclosed in advance or not reimbursed	<1%	2.1%	<b>2.1%</b>
<b>Control of documents</b> Employers maintain possession or control over worker identity documents	<1%	<1%	<b>&lt;1%</b>

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 2022 and 2023 represents findings from audits of Amazon-branded product suppliers only. 2024 data has an expanded scope that includes both Amazon-branded product suppliers and Amazon's own operations.

In addition to our audit program, we prioritize transparency in our supply chain to further enhance our detection capabilities. 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. Updated at least yearly, this information provides customers and external stakeholders visibility into where we source. In 2024, we began expanding our supply chain map to include some apparel component suppliers. We share our supplier list to the [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 look 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 directly with us through our [Human Rights and Environmental Complaints Form](#), which is available in 19 languages and dialects and can be accessed globally.

We empower and encourage 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 and MyVoice. MyVoice—Amazon's primary Voice of Associate platform—provides a two-way communication channel between global associates and their site leadership. We also continue to hold associate roundtables across our global operations to understand their familiarity with grievance mechanisms, whether they are able to access them, and what barriers they may face in using them.

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 assist suppliers to improve their own internal systems, conduct supplier and worker training, triage cases, and help improve management of the grievance process.

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 2024, we helped connect supplier sites in eight countries with third-party grievance mechanisms. One example is the Amader Kotha Helpline, which is run by Nirapon, an industry-led nonprofit that works with global brands, retailers, manufacturers, and other NGOs to create and sustain a culture of workplace safety in factories in Bangladesh. Another example is Ulula, a private sector platform which enables workers at Amazon suppliers in Cambodia, China, India, and Pakistan to participate in surveys and access a helpline with remedy-centered third party specialized support to report concerns. In Japan, we partner with the Japan Platform for Migrant Workers towards Responsible and Inclusive Society (JP-MIRAI) to provide workers at certain supplier sites access to JP-MIRAI's independent grievance mechanism.

### **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. In 2023, we launched an initiative to identify and proactively address any forced labor and modern slavery indicators across our business, bringing together employees from our human rights, eCommerce, and fraud teams. In 2024 we strengthened our detection and prevention capabilities; we established robust reporting mechanisms and enhanced monitoring systems designed to identify and address potential indicators quickly and efficiently. Through our awareness program, we delivered specialized training to a number of associates across our operations.

Our customers use AWS technology to detect modern slavery. Throughout 2024, we continued to partner closely with Thorn, a nonprofit that builds technology to combat child sexual abuse at scale. Amazon provides millions of dollars in AWS credits for Thorn to power its tools. Thorn leverages a variety of AWS solutions to support Safer, a tool that uses advanced AI and machine learning models to detect child sexual abuse and exploitation at scale. Safer helps companies identify, review, and report child sexual abuse material (CSAM) and conversations leading to child sexual exploitation on content-hosting platforms. While Safer primarily focuses on detecting CSAM, its technology can indirectly aid in identifying human trafficking by helping to expose online grooming and recruitment efforts that often involve children. Safer has helped companies detect over 6 million CSAM files. We make Thorn's Safer technology available to businesses via the Amazon Web Services (AWS) Marketplace so they can proactively identify and address CSAM.

In the U.S., Amazon collaborates with the National

Center for Missing & Exploited Children (NCMEC), a child protection organization committed to aiding the search for missing children, reducing child sexual exploitation, and preventing child victimization. NCMEC utilizes AWS technology and services to support the infrastructure of several programs. Amazon's subsidiary Ring works with NCMEC to distribute geo-targeted missing child posters visible in the Ring Neighbors app and across social media. NCMEC's Missing Child posters encourage users to contact proper law enforcement or NCMEC if they have information that could aid in the search for a missing child. Through their CyberTipline and educational resources, NCMEC also aids in the identification and prevention of online enticement and recruitment by potential child traffickers. Amazon serves on NCMEC's Board of Directors, and in 2024, provided over 1 million dollars in AWS credits to reliably support mission-critical applications that assist NCMEC's mission of making sure that every child has a safe childhood.

### **Prevention**

#### **Supply Chain Standards Implementation**

An important component of prevention is education and awareness of risks. We promote awareness and support implementation of our Supply Chain Standards through dedicated teams in key sourcing regions who work directly with suppliers. These teams support suppliers in developing necessary skills and mechanisms for meeting and exceeding our Standards while continuously monitoring and adapting to regulatory changes in operating countries.

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.



### ***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 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 2024, we began exploring the expansion of our due diligence to include additional minerals, such as lithium, nickel, and graphite. This expanded due diligence will be implemented in 2025.

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 partnerships and engagements, we collaborate with industry peers, governments, and civil society actors to increase supply chain transparency and improve sourcing across mineral value chains.

In 2024, Amazon also continued supporting the Responsible Sourcing Network's initiative YESS™: Yarn Ethically & Sustainably Sourced by joining in its first cohort of multi-stakeholder members. YESS supports fabric and spinning mills in implementing risk-based due diligence on cotton sourcing and promotes collaboration with the goal of preventing, mitigating, and remediating forced labor in cotton

production.

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

### ***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 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 on ethical recruitment practices, implement remediation plans to safely reimburse workers, and develop programs to prevent future recruitment fees throughout the hiring process.

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.

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. Our responsible recruitment performance evaluation survey, consists of a list of targeted questions to gather information on risks, controls, and recruitment agencies.

### ***Capability Building and Training***

As a global company employing over a million workers around the world, we recognize our responsibility and opportunity to raise awareness of human rights issues among our employees and collaborators. Our training and capacity building efforts span multiple areas.

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 and report concerns to appropriate authorities. As a corporate sponsor of TAT (Truckers Against Trafficking), we support their mission to educate, equip, empower, and mobilize members of key industries and agencies to combat human trafficking. We include TAT modules in our training for internal fleet drivers to help them identify and respond to potential instances of human trafficking.

We are working to constantly improve our approach to combating child labor. We are a member in the Child Rights in Business Working Group, founded by The Centre for Child Rights in Business (The Centre). With The Centre, we provided online training on child labor prevention, remediation, and young worker management to our central human rights team, key internal stakeholders, and select suppliers.

In 2024, we launched human rights as a focus area in 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, stakeholders can find fundamental steps for establishing a human rights program, including supporting workers' rights to freely chosen employment, case studies that showcase how others are implementing more sustainable practices across their operations, and resources and tools to empower businesses to take action.

To promote awareness of our Supply Chain Standards, in 2024, we developed and deployed online trainings to a number of our suppliers, including new courses on building labor management systems. Additionally, we made 38 third-party online trainings covering 14 human rights topics, such as responsible recruitment, accessible for our businesses to offer to their suppliers. To complement our online training efforts and further support our suppliers, we hosted in-person workshops across multiple countries.

### ***Strategic Partnerships and Collaboration***

To enhance our prevention efforts, we engage in strategic partnerships and collaborations across the industry. In 2024, we expanded our relationships and work with key external partners to advance our work on modern slavery.

Our industry engagement includes participation in the Indirect Spend Alliance (ISA) to identify operational areas of shared human rights risk in procurement and leverage best practices from the industry in addressing hotspots and collaborating with Better Work's regional teams and Buyers Forum to share knowledge about human rights issues and advance collective action. These collaborations are essential

for identifying hotspots and developing impactful risk mitigation strategies that put the interests of workers first.

As a member of BSR, a sustainable business network and consultancy focused on creating a world in which all people can thrive on a healthy planet, we participate in key multistakeholder initiatives including Tech Against Trafficking, Global Business Coalition Against Trafficking, and the Human Rights Working Group. Through our Tech Against Trafficking steering committee role, we work with companies and global experts to eradicate human trafficking using technology. In 2024, Amazon hosted the third annual Tech Against Trafficking Summit, bringing together 162 experts, including individuals from technology companies, governments, human rights nonprofits, and those with lived experience, to explore technology-driven solutions both for improving supply chain transparency on forced labor and accelerating the efforts of local and global anti-trafficking organizations.

In February 2024, Amazon facilitated discussions with multiple companies on ways to protect young workers and eliminate child labor in American supply chains. We also supported JP-MIRAI in launching a Fair and Ethical Recruitment Initiative. This initiative aims to advance migrant worker rights through stakeholder engagement and specialized training programs in the Asia-Pacific region.

### **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.

### **Remediation**

When we identify gaps between a supplier's practices and our Supply Chain Standards, we track remediation and conduct follow-up assessments as needed. Our central team engages directly with suppliers on open issues and remediation progress, and provides them with issue-specific guidebooks. Audit findings are categorized as high, medium, or low depending on severity. When high- and medium-level issues are identified, we take steps to verify that suppliers have made meaningful progress toward remediation. For low-level issues, we monitor suppliers for continuous improvement through maintenance audits. While the remediation varies based on the nature and scope of the issues, we prioritize working with suppliers to respond quickly, remove harm, act in the best interests of workers, and commit to preventing similar issues in the future.

We maintain ongoing engagement with suppliers to embed respect for human rights in their operations and supply chains, improve their practices to protect



workers, and enhance working conditions. 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 equipping suppliers with appropriate tools and strategies enables effective risk management in their supply chains. In 2024, the Mekong Club, a nonprofit organization that partners with the private sector to help prevent modern slavery, contributed expertise to update our responsible recruitment guidebook, enhancing support for suppliers in developing and maintaining responsible recruitment practices.

Remediation can sometimes be challenging when certain issues are identified. For example, addressing worker-paid recruitment fees in countries where they are legally permitted, culturally accepted, or part of government programs. Remediation in these circumstances might also involve emphasizing that our prohibition of worker-paid recruitment fees applies regardless of local laws 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 working with suppliers to encourage remediation whenever possible, using disengagement only as a last resort, as we recognize that terminating business with a supplier can remove the incentive for improvement and have a detrimental effect on workers and communities. In cases where remediation measures are taken, we will consider whether additional steps are necessary to address the income loss experienced by the most vulnerable families impacted by these measures.

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

### ***Case Study: Harvesting the Future – Cotton in India initiative***

In 2024, Amazon announced participation in the Harvesting the Future—Cotton in India initiative, a multi-sector collaboration coordinated by the Fair Labor Association. This three-year effort connects Amazon and 23 other global brands with Indian garment and textile producers and several local implementing partners to enhance working and living conditions for cotton farmers and their families across 30 villages in Madhya Pradesh, India. After a comprehensive scoping study, the brand group focused on specific efforts to create improvements in the cotton sector, such as establishing child-labor-free zones, initiatives to help ensure legal wages, and monitoring of working conditions. This initiative is an example of how we continue to support a systems-change approach through industry collaboration.

### ***Case Study: Amazon's Operations in the Middle East***

As we expand our global presence, we continue to strengthen worker protections and enhance oversight across our Middle East operations, working with partners and local stakeholders to address broader regional challenges. In 2023, Amazon found violations of our Supply Chain Standards at a third-party licensed temporary labor agency ("third-party vendor") in Saudi Arabia through an independent audit. The violations ranged from recruitment fees paid by migrant workers to the absence of grievance mechanisms and issues with worker accommodations. External organizations raised similar concerns and shared information with us about these and other human rights risks collected during interviews with former employees of this third-party vendor. For more information see our [2023 Modern Slavery Statement](#).

In response to these findings, we implemented a comprehensive action plan in 2023 and expanded these efforts throughout 2024. Our enhanced due diligence included reviewing worker engagement practices and assessing the alignment of employment benefits with local regulations. We strengthened employment frameworks, implemented fee reimbursement programs to address historical fee payments, and launched worker education initiatives across United Arab Emirates and Saudi Arabia facilities.





## Monitoring Effectiveness and Impact

Our commitment to addressing modern slavery risks requires ongoing assessment of our efforts' effectiveness and impact.

We monitor audit results and remediation measures to evaluate effectiveness and continuously 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 and engaging company-wide to address these challenges.

*Continued on next page.*

## Approval and Signature

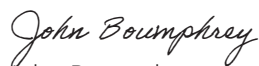
Amazon's global policies, practices, and procedures to assess and address modern slavery risks are implemented with attention to the local contexts and specific regional needs, in consultation with all reporting entities and their subsidiaries. Consultation on Amazon's approach to modern slavery is led 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 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, 2025

*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, 2025

*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, 2025

*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.*

Kevin Grimes  
Director, 27 May 2025



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





## Appendix – 2024 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, 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. 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 2023, based on (i) responses to self-assessment questionnaires; (ii) suppliers' sectors (professional services such as public relations, accounting and legal services, pension and insurance, human resources, and facilities management); (iii) worker classification (largely skilled professionals); and (iv) 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 in the past year, 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.