

# Modern Slavery Statement

This statement addresses the period from January 1, 2020,<sup>1</sup> to December 31, 2020,<sup>2</sup> in compliance with the requirements of the United Kingdom Modern Slavery Act, the Australia Modern Slavery Act, and the California Transparency in Supply Chains Act.<sup>3</sup>

<sup>1</sup> Metrics contained herein cover 2020 activities, unless otherwise indicated. <sup>2</sup> Our last statement covered the period from Jan 1, 2019 to July 31, 2020 due to the extended timeline for the last reporting period. Therefore, this report overlaps in timeline with the previously published statement. <sup>3</sup> This statement excludes any entity that elects to report independently.



## Introduction

Modern slavery is one of the most complex and important human rights challenges of our time. According to the International Labour Organization (ILO), the term modern slavery covers a set of legal concepts, including forced labor, debt bondage, and human trafficking. It is an umbrella term to refer to situations of exploitation that an individual cannot refuse or leave because of threats, violence, coercion, deception, or abuse of power.<sup>4</sup> According to a 2017 ILO report,<sup>5</sup> at any given time there are more than 40 million people in situations of modern slavery worldwide, nearly 25 million of whom are trapped in forced labor, a condition that violates the human right to freely chosen employment. The devastating health and economic crisis caused by the COVID-19 pandemic increases the risk of modern slavery and other forms of exploitation for many people and communities. The COVID-19 crisis exacerbates underlying factors that can make people vulnerable to modern slavery, including poverty, financial insecurity, lack of mobility caused by local or national shutdowns, and supply chain and logistics challenges due to changes in demand.

Amazon does not tolerate modern slavery. It will take commitment, resources and innovative solutions from governments, international organizations, the private sector, and civil society to prevent modern slavery from impacting so many. At Amazon, we understand the unique responsibility of the private sector in these efforts and are committed to expanding our work to understand and address any modern slavery risks that may arise in the course of our business.

In 2020, we strengthened our efforts to identify and prevent the risk of modern slavery. We helped suppliers of Amazon-branded products (Suppliers) increase their capacity to responsibly manage migrant worker recruitment and offered more ways for our Suppliers' workers to voice concerns. We also adapted our programs to support our Suppliers during COVID-19, while continuing to look for and address indicators of modern slavery. We expanded modern slavery training programs to raise awareness throughout our own operations. We enhanced our partnerships with industry associations and non-profit organizations to develop best practices in addressing risk of modern slavery. This statement assesses our risk, outlines our efforts, and sets commitments for the coming year.

## Our Business

Amazon strives to be Earth's Most Customer-Centric Company, Earth's Best Employer, and Earth's Safest Place to Work. As of December 31, 2020, Amazon employed approximately 1.3 million full and part-time workers across the globe. In each of our segments we serve our primary customer sets, consisting of consumers, sellers, developers, enterprises, and content creators. In addition, we provide services, such as advertising to sellers, vendors, publishers, authors, and others, through programs such as sponsored ads, display, and video advertising. We have organized our operations into three segments: North America, International, and Amazon Web Services (AWS).

We design our stores to enable hundreds of millions of unique products to be sold by us and by third parties across dozens of product categories. Customers access our offerings through our websites, mobile apps, Alexa, devices, streaming, and physically visiting our stores. We also manufacture and sell electronic devices, including Kindle, Fire tablet, Fire TV, Echo, Ring home security products, and other devices, and we develop and produce media content. In addition, we offer Amazon Prime, a membership program that includes unlimited free shipping and other benefits. We fulfill customer orders in a number of ways, including through: North America and International fulfillment and delivery networks that we operate; co-sourced and outsourced arrangements in certain countries; digital delivery; and through our physical stores. We operate customer service centers globally, which are supplemented through co-sourced arrangements. We offer programs that enable sellers to grow their businesses, sell their products in our stores, and fulfill orders through us. We are not the seller of record in these sellers' transactions. We earn fixed fees, a percentage of sales, per-unit activity fees, interest, or some combination thereof, for our seller programs.

We serve developers and enterprises of all sizes, including start-ups, government agencies, and academic institutions through our AWS segment, which offers a broad set of on-demand technology services, including compute, storage, database, machine learning, and other service offerings. AWS is the world's most comprehensive and broadly adopted cloud platform; we sell over 200 fully featured AWS services from data centers globally.

<sup>4</sup>"Global Estimates of Modern Slavery," The International Labour Office, Walk Free Foundation, and International Organization for Migration, page 16, [https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/documents/publication/wcms\\_575479.pdf](https://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/documents/publication/wcms_575479.pdf). The respective laws that guide this statement also have references to relevant definitions and statutes related to modern slavery. <sup>5</sup> Ibid, page 9.



With operations and supply chains spanning the globe, we are committed to improving the working conditions of people who are connected to our business and recognize the need to monitor for conditions that put workers at risk of modern slavery.

More information about Amazon can be found in our most recent [Annual Report](#) and our latest [Proxy Statement](#).

## Our Policies

Through our policies we communicate our values and expectations, setting a high bar for ourselves and our partners and making clear that we do not tolerate modern slavery. We are committed to consistently evolving and improving our approach. We regularly review our policies to identify areas for update and improvement. We conduct in-depth benchmarking against international standards and evolving industry norms at least every three years in line with industry best practice.

### Global Human Rights Principles

Amazon is committed to ensuring the people and communities that support our business are treated with fundamental dignity and respect. From the employees in our fulfillment centers, to the drivers delivering packages to our customers, to the workers in factories making the products we sell—people enable our mission to be earth's most customer-centric company. These values have been long-held at Amazon and codifying them into a set of [Global Human Rights Principles](#) demonstrates our support for fundamental human rights and the dignity of workers everywhere we operate around the world. We strive to ensure the products and services we provide are produced in a way that respects internationally recognized human rights, including the right to freely chosen employment. We do not tolerate the use of child labor, forced labor, or human trafficking in any form—including slave labor, prison labor, indentured servitude, or bonded labor—in our operations or value chain. Our commitment and approach are informed by leading international standards and frameworks developed by the United Nations (UN) and ILO. Amazon is committed to respecting and supporting the UN Guiding Principles on Business and Human Rights, UN Universal Declaration of Human Rights, Core Conventions of the ILO, and ILO Declaration on Fundamental Principles and Rights at Work.

### Code of Business Conduct and Ethics

We are committed to conducting our business in a lawful and ethical manner. Our [Code of Business Conduct and Ethics](#) (Code) sets out guiding principles on professional conduct and establishes that in performing their job duties, Amazon employees should always act lawfully, ethically, and in the best interests of Amazon. All Amazon employees take mandatory compliance training courses on the Code, Anti-Bribery Compliance, and Workplace Harassment. Employees may raise questions or report suspected violations of our Code through Amazon's Ethics Line, by phone or online. Employees have made reports in 30 languages of the 165 available to them. Reports to the Ethics Line are answered by an independent third party and may be made anonymously upon request. Our Business Conduct and Ethics team records, reviews, and directs for investigation calls for potential violations of the Code, and tracks cases through to remediation where necessary. The Audit Committee<sup>6</sup> receives and reviews certain reports on complaints, allegations, and incidents reported pursuant to the Code.

### Supply Chain Standards

We set a high bar for ourselves and our suppliers. Amazon's [Supply Chain Standards](#) are grounded in principles of inclusivity, continuous improvement, and supply chain accountability. We review our Supply Chain Standards at least every three years against policies developed by industry associations (such as the Responsible Business Alliance and the Consumer Goods Forum) and in consultation with external stakeholders including [Nest](#), [Business for Social Responsibility](#), [Impactt Limited](#), and [Verité](#).

Selling Partners,<sup>7</sup> Suppliers, and goods and services providers for Amazon's operations are subject to these standards as a condition of doing business with us. We expect that all products and services provided to Amazon or sold in Amazon Stores are manufactured or produced in accordance with our Supply Chain Standards.

Our Supply Chain Standards focus on preventing situations that can put workers at risk of modern slavery. They require that all work must be voluntary and workers must be free to leave work and terminate their employment or other work status with reasonable notice. Suppliers must not require workers to surrender government issued identification,

<sup>6</sup>The Audit Committee oversees management of risks related to our financial statements and financial reporting process; data privacy and security; business continuity; operational risks; the qualifications, independence, and performance of our independent auditors; the performance of our internal audit function; legal and regulatory matters; and our compliance policies and procedures. <sup>7</sup>Selling Partners are third-party sellers (sellers) and retail vendors who offer products for sale in Amazon's stores.



passports, or work permits as a condition of work. Suppliers must provide workers with documentation clearly stating the terms of employment in a language the worker can understand. Our Supply Chain Standards reflect domestic and foreign migrant workers' unique vulnerability to situations of modern slavery and make clear that workers may not be charged recruitment fees at any point in the recruitment process. We expect our Suppliers to analyze and monitor the practices of recruitment agencies and labor brokers and to employ agencies that act ethically and in the best interests of workers.

## Governance

We are committed to embedding human rights considerations into decision-making across the company and into our policy and governance framework. This governance starts with the Amazon Board of Directors (Board), which appoints committees for oversight on specific issues. Committees keep the Board informed of committee actions and assist the Board in fulfilling its oversight responsibilities. The Audit Committee oversees Amazon's compliance with legal and regulatory requirements, such as issues relating to the Code of Business Conduct and Ethics. The Nominating and Corporate Governance Committee oversees Amazon's global environmental, corporate social responsibility (including as this relates to its operations and supply chain), and corporate governance policies and initiatives. The Leadership Development and Compensation Committee oversees human capital management matters, including workplace safety, culture, diversity, discrimination, and harassment. Members of executive leadership formally approve Amazon policies, including those listed above. Read more about our corporate governance structure.

## Assessing Our Risk

Understanding our modern slavery risk is critical to targeting our actions and partnerships to prevent and address the issue. We analyze risk in our business by engaging in research, mapping our supply chain against existing human rights indices, analyzing internally-conducted and industry audit results, and partnering with key stakeholders. In 2020, we completed an exercise to identify salient human rights risks across our business. For more information on our saliency assessment, please see our 2020 Sustainability Report.

## Vulnerable Groups

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

- Domestic and foreign migrant workers
- Contract, agency, and temporary workers
- Vulnerable populations (*e.g.*, refugees)
- Young or student workers

## Region-Specific Risk

While modern slavery can be found in all countries, some countries are associated with a higher risk for modern slavery, for example, countries with large populations of migrant workers, with weaker labor law enforcement, where charging workers recruitment fees is common practice, or where modern slavery prevalence has been well documented. Based on globally accepted risk indices—the Global Slavery Index and indices related to forced labor and migration—and review of our supply chain footprint, we understand that the following countries in our supply chain present higher risks for modern slavery, requiring additional due diligence, partnership, and collaboration:

- Thailand
- Turkey
- Malaysia
- Pakistan
- Philippines

## Our Supply Chain

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



Our relationships with our Suppliers and monitoring of their practices for modern slavery indicators also allow us to better understand our modern slavery risks. We look for site-specific modern slavery indicators that can indicate heightened risk, including the presence of workers who are part of vulnerable populations, a Supplier's failure to deliver on a promised term of employment, restriction of worker movement, a Supplier's retention of identity documents, debt bondage indicators such as charging recruitment fees, and excessive overtime requirements. This data informs our efforts to respond to those risks.

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

## **Responsible Sourcing of Amazon-Branded Products**

Our goal is for our products to be made in a way that respects human rights and the environment. Our Responsible Sourcing Program focuses on suppliers of Amazon-branded products, consisting of Amazon Private Brands, Amazon devices, and a curated selection of brands exclusively sold in Amazon's store. These Suppliers produce, manufacture, assemble, or provide Amazon-branded products that are delivered and sold to Amazon. We publish a map and list of Suppliers that produce Amazon-branded apparel, consumer electronics, food and beverage, and home goods products to provide customers and external stakeholders visibility into where we source. The map is updated annually in June and is subject to periodic updates. A file of the map data is available for download.

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

## **Supplier Due Diligence**

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

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

In 2020, we adapted our supplier assessment protocols and programs to support our Suppliers during the economic and health crises caused by COVID-19, while also ensuring we maintained our high standards of due diligence on issues like modern slavery. More information on our approach is detailed in the section outlining our response to COVID-19.

<sup>6</sup>The Responsible Sourcing Program supports Amazon businesses in monitoring Suppliers for compliance with Amazon's Supply Chain Standards and policies, aligning Amazon businesses with our Global Human Rights Principles.



## Table 1: 2019 and 2020 Related Audit Findings

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

<b>Related Findings</b>	<b>% of Audits where issue was found, 2019</b>	<b>% of Audits where issue was found, 2020</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	9.95%	10.13%
<b>Ineffectively communicated employment information</b> Employment documentation was not communicated in the worker's native language or changes in terms of employment were not declared or were not negotiated	2.79%	4.27%
<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	1.94%	6.71%
<b>Worker-paid recruitment fees</b> Fees related to recruiting and hiring were not disclosed in advance or not reimbursed	1.76%	Less than 1%
<b>Control of documents</b> Employers maintain possession or control over worker identity documents	1.25%	Less than 1%

Our assessment data helps us determine where to focus our efforts and resources, and provides insight into industry-wide challenges and systemic issues. We rely on our audit processes to provide us with important information about our Responsible Sourcing Program so that we can respond to the needs of workers making Amazon-branded products. These insights help us tailor our programs and identify strategic partnerships, highlighted in the “Our Progress” section below, to build Supplier capacity and address and prevent these issues. Audits also help us detect an issue before we engage with Suppliers or during our relationship with them so that we can work with Suppliers to remedy the issue. If audit findings require remediation, including those related to modern slavery, Suppliers develop a corrective action plan detailing actions to address those findings. We may conduct announced or unannounced on-site verifications or request additional documentation from Suppliers. For example, in cases of worker-paid recruitment fees, we identify where workers migrated from and how much they paid in recruitment fees. If fees have been paid, we require the Supplier to reimburse workers in full. We also expect Suppliers to consistently monitor and enforce our standards in their own operations and supply chain, as well as make improvements to meet or exceed our expectations.

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

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

of the critical information we need to make a difference in the lives of workers. When issues are identified, remediation can also be a challenge. For example, working with our Suppliers to remediate worker-paid recruitment fees is particularly challenging in countries where payment of recruitment fees is a part of accepted business practice or an accepted part of government programs.

We know we cannot address many of these intractable issues alone; they will require broader collaboration between governments, international organizations, the private sector, and civil society. As we discuss in the “Our Progress” section below, we develop materials and sponsor workshops to empower Suppliers to develop their own management systems and contribute to industry association and multi-stakeholder initiatives working to address systemic issues. We continue to update our due diligence mechanisms to drive lasting change focused on benefiting workers in our supply chain.

### **Responsible Minerals Sourcing**

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

### **Our Progress ...with our Suppliers of Amazon-branded products**

**We strengthened our responsible recruitment standards to ensure that no worker pays for a job.** Because of our efforts to ensure responsible recruitment of migrant workers, a recruitment fee-related finding in a Supplier audit constitutes a core breach of Amazon’s Supplier qualification requirements. This means, unless the Supplier is engaged in active remediation of the recruitment fees issue, Amazon will not do business with that Supplier.



### **We support our Suppliers to meet our standards.**

In 2020, we expanded our teams located in Asia, Europe, the Middle East, and the Americas to help Suppliers in strategic regions build their capacity to meet our Supply Chain Standards. We offer Suppliers on-site and remote training to help them understand Amazon requirements, effectively navigate the corrective action plan process, and design and implement sustainable management systems to encourage Supplier monitoring throughout their supply chain. We partner with Suppliers on particular areas of concern and encourage Suppliers to participate in external training programs, such as industry association tutorials to recognize and prevent modern slavery and implement high-quality management systems. We are continuously exploring ways to use Amazon's expertise to expand this support.

**We developed guidance for Suppliers specifically on responsible recruitment practices.** Amazon engaged Verité, a recognized leader in global labor protection, to develop a Responsible Recruitment Guidebook for our Suppliers focused on migrant worker recruitment. The guidebook offers Suppliers guidance on implementing a zero worker-paid recruitment fee policy, instructs Suppliers on how to calculate fee repayment and create an effective reimbursement plan for workers who paid recruitment fees, and provides strategies for engaging responsible labor agents.

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

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

### **CASE STUDY: Remediating recruitment fee findings**

We believe we can incentivize lasting change by working closely with Suppliers to ensure they pay back recruitment fees owed to workers and training Suppliers on responsible recruitment, including how to identify responsible labor agents for future hiring. Some Suppliers have difficulty identifying if workers have paid recruitment fees and, when found, remediating, particularly if fees are charged to workers by labor contractors in their home countries. We are committed to working with our Suppliers on remediation when recruitment fee issues are identified. For example, a 2020 audit of a Taiwanese Supplier found Vietnamese migrant workers had paid recruitment fees prior to arrival at the factory and continued to pay monthly service fees to the local labor broker. Our regional team shared our Responsible Recruitment Guidebook and worked with the Supplier to develop a comprehensive remediation plan. The Supplier now pays all service fees directly to the local labor broker on behalf of the migrant workers and has been working to calculate and reimburse all affected workers for the fees they already paid. The Supplier is on track to repay all fees to the impacted workers and set up systems to prevent the situation in the future.

The guidebook also provides Suppliers with sample language for terms of employment, including terms that ensure properly communicated, complete employment documentation between Suppliers and workers. In 2020, the guidebook was shared with Suppliers in China, Malaysia, and Taiwan where recruitment fee issues were identified.

**We provided Suppliers with responsible recruitment training.** In 2020, we sponsored the Responsible Labor Initiative's responsible recruitment training in Malaysia and Taiwan and enrolled 31 Amazon Suppliers. This program focused on modern slavery risks and the importance of responsible recruitment, including teaching participants how to implement effective risk mitigation controls, identify issues in their recruitment and hiring processes for migrant workers, and draft an implementation plan for addressing these issues. After the training, the majority of Suppliers reported that the training had been helpful to improving their recruitment strategy.

**We continue to deepen our due diligence beyond our direct Suppliers.** In 2020, we continued to map deeper tiers of our Amazon-branded product supply chains in order to identify the most salient and material risks. Commodity supply chains are complicated and fragmented, and improved visibility into raw material supply chains better enables businesses to identify human rights and labor rights violations and hold Suppliers accountable.





## **CASE STUDY: Partnership with International Organization for Migration (IOM) on recruitment practices in Japan and key countries of origin**

The issue: In Japan, many foreign migrant workers come into the country through the Technical Intern Training Program (TITP). To participate in this government program, migrant workers apply through accredited recruiting organizations in their home country. Fourteen countries of origin have bilateral Memorandums of Cooperation with Japan regulating this migration. Most countries of origin allow recruitment fees and related costs to be legally charged to migrant workers, however, workers at times pay significantly more than what is legally permitted. Migrant workers are also subject to other types of abuses, such as employers retaining workers' identity documents, excessive working hours, underpayment of overtime, and workers' forced return to their countries of origin.

Partnering with the International Organization for Migration (IOM): The IOM Corporate Responsibility in Eliminating Slavery and Trafficking (CREST) is a regional initiative that supports companies in upholding the human and labor rights of migrant workers in their business operations and supply chains. In 2020, Amazon partnered with CREST to conduct research on the legal frameworks governing migrant workers in Japan and the challenges and vulnerabilities workers face with TITP and other migrant worker entry points. In 2021, in partnership with CREST, we will use this research to develop a region-specific education program for our Suppliers on migrant worker vulnerabilities in Japan. The training will support suppliers in identifying, assessing, and mitigating specific risks to migrant workers, including worker-paid recruitment fees.

In 2020, we strengthened our efforts on cotton. Amazon joined other brands as members of Better Cotton Initiative's Retailer and Brand Advisory Panel on Traceability. In 2021, Amazon is sponsoring and participating in Responsible Sourcing Network's initiative YESS™: Yarn Ethically & Sustainably Sourced. YESS works to address forced labor in the cotton value chain by providing training to, and managing the assessment of, spinners and fabric mills to prevent forced labor in cotton production.

In 2020 we became a member of the Public-Private Alliance for the Responsible Minerals Trade (PPA) and expanded our participation in the Responsible Minerals Initiative (RMI). We committed to supporting the PPA's on-the-ground efforts to promote responsible trade, and became active members of RMI's working groups on Smelter Engagement and Cobalt due diligence.

In 2021, we will conduct a materiality assessment and develop a holistic commodity risk framework to better

identify and understand the upstream risks and priority commodities in our supply chain and develop strategies for mitigating those risks.

### **...with our operations**

**We offer various ways for our employees to share grievances and raise concerns.** Amazon offers a variety of communication mechanisms for employees, including an externally managed Ethics Line. For more information on these systems, please see our [2020 Sustainability Report](#).

**We provide a modern slavery training program for our own employees.** As a global retail and technology company employing over a million workers around the world, we recognize the responsibility and opportunity we have to raise awareness among our employees on relevant human rights and social responsibility issues. In 2020, we expanded our training program to educate employees throughout our entire global fulfillment network to recognize signs of modern slavery and report concerns to appropriate authorities in a way that puts the interests of victims first. To develop the training, we worked with experts in the field and incorporated videos and materials from the Gangmasters and Labour Abuse Authority (GLAA), a UK public agency focused on investigating labor exploitation. Additionally, our global security operations team has immediate response protocols in the event of a suspected modern slavery-related issue, regardless of where the issue arises.

**We train Amazon truck drivers on modern slavery prevention.** We are an official corporate sponsor of Truckers Against Trafficking (TAT), an organization dedicated to combating human trafficking in the trucking industry. We began using TAT training modules to train our internal fleet of drivers, teaching them how to identify and respond to potential victims of human trafficking. As of January 2021, we had trained 100% of Amazon employees who are behind the wheels of trucks in our middle-mile business.

### **...with our Selling Partners**

**We include our Supply Chain Standards as part of our business relationship with Selling Partners.** Selling Partners are third-party sellers (sellers) and retail vendors (vendors) who offer products for sale in Amazon's stores. Our Supply Chain Standards apply to every product sold in our stores, and we expect Selling Partners to do their own due diligence, ensuring every product is produced in safe, healthy, and inclusive work environments. Selling Partners contracting with Amazon for services, (including Selling on Amazon,



Fulfillment by Amazon, Amazon Advertising, Transaction Processing Services, and the Selling Partner API) agree to the terms of the Amazon Services Business Solutions Agreement, which incorporates Amazon's Supply Chain Standards.

### **We increased due diligence of Amazon Selling Partners.**

We evaluate credible allegations or reports of Selling Partner violations of our Supply Chain Standards, including but not limited to those published by governments, reputable investigators, journalists, or human rights defenders. If we have reason to suspect certain products do not meet our Supply Chain Standards, we may request that the Selling Partner: demonstrate that the products it sells in our store were manufactured in accordance with Amazon's Supply Chain Standards, provide evidence of auditing protocols, show processes for assessing factory working conditions, engage in unannounced audits, participate in an approved industry association that includes factory monitoring, or verify where the products are made.

### **...with AWS**

**Our customers use AWS technology to combat modern slavery.** Thorn, an organization that builds technology to defend children from sexual abuse, leverages AWS machine learning tools in their product Spotlight. Spotlight's sophisticated machine-learning capabilities save time for investigators by automatically flagging ads likely to represent at-risk children. Investigators can set customized alerts and search Spotlight's constantly growing database of ads to aid in their investigations. Spotlight has helped identify more than 17,000 child sex trafficking victims.

**Our customers use AWS technology to help victims of human trafficking.** We support Polaris, a nonprofit leading a social justice movement to fight sex and labor trafficking at massive scale. AWS works with Polaris to infuse cutting-edge technology into its infrastructure to accelerate the development of the largest known US data set on trafficking. Polaris uses that data to understand and improve the way trafficking is identified, how victims and survivors are assisted, and how to prevent this abuse. Polaris also assists victims and survivors through the US National Human Trafficking Hotline, which has identified and responded to over 63,000 cases of human trafficking and labor exploitation since 2007.

### **...with other organizations**

### **Amazon is collaborating with NGOs, governments, and other companies to reduce and disrupt modern slavery.**

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

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

### **Modern Slavery in the Context of COVID-19**

We have been diligently working to take action to mitigate the toll COVID-19 has taken on people around the world. We know that Suppliers and their workers are uniquely impacted by COVID-19. The ILO reports<sup>9</sup> that COVID-19 will likely exacerbate underlying factors driving modern slavery, including poverty, limited access to decent work opportunities, social marginalization, discrimination, the lack of universal quality education, and the prevalence of the informal economy and weak social dialogue. In 2020, we took action to address heightened modern slavery risks in our supply chain due to COVID-19 in several areas.

**We adapted our Supplier due diligence to the constraints posed by COVID-19.** We continue to monitor Suppliers for compliance with our Supply Chain Standards and made necessary modifications to auditing procedures based on internal and external stakeholder recommendations. Though COVID-19 limited our ability to have auditors on site, we continued our diligence through alternative means through this critical period. In 2020, we used traditional audit models to assess risk when it was safe to do so. When traditional on-site audits became challenging or impossible due to government quarantines and important safety restrictions, we adopted new mechanisms to assess risk, including self-

<sup>9</sup>International Labour Organization, "COVID-19 impact on child labour and forced labour: The response of the IPEC+ Flagship Programme," at [https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---ipec/documents/publication/wcms\\_745287.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---ipec/documents/publication/wcms_745287.pdf)



assessment questionnaires or remote document review to monitor progress against Amazon's Supply Chain Standards. We have taken learnings from the initial remote assessment tools developed and implemented in 2020 and made improvements to our remote assessment program for 2021.

**We maintained close communication with Suppliers during this crisis.** At the beginning of the pandemic, we communicated with our Suppliers to remind them of our expectations based on our Supply Chain Standards. We encouraged Suppliers to take certain measures, such as not ending worker contracts, continuing to pay workers during shutdowns, and providing more flexibility to workers impacted by COVID-19, for example if a worker or family member is sick. We later developed and shared detailed COVID-19 specific guidelines with our Suppliers. We provided nine live webinars in six languages to share resources and practical guidance on workplace hygiene and safety to prevent the spread of COVID-19 in the workplace. These materials included instructions for Suppliers on how to develop a preparedness plan, conduct a risk assessment, and organize the workplace to ensure proper hygiene and PPE use. Our Responsible Sourcing Program teams in Asia, Europe, the Middle East, and the Americas continue to provide guidance to Suppliers on our Supply Chain Standards and work with Suppliers to remediate identified issues.

**We ensured our business decisions supported Suppliers during the crisis.** Since the beginning of the COVID-19 pandemic, Amazon has honored all orders to our global Suppliers for our US and EU private-label apparel businesses.

**We are partnering with organizations providing critical support to Suppliers and workers during the pandemic.** In 2020, we created a \$1.3 million fund to invest in organizations providing critical frontline support to workers impacted by COVID-19, including:

- In Bangladesh, we partnered with the International Organization for Migration (IOM) to distribute medical supplies and COVID-19 related resources for frontline doctors, nurses, and medical workers operating in the largest refugee camp in the world. The contribution supports the procurement of lifesaving PPE—approximately 322,000 gloves, 16,000 gowns

and coveralls, 18,300 N95 respirators, and 119,000 face shields. These were distributed to community health workers and health care providers at IOM and government health facilities in the refugee camp, serving to benefit both refugee and host community populations in the region.

- We increased our work with the ILO's Sustaining Competitive and Responsible Enterprises (SCORE) program, a lean manufacturing program focused on improving productivity and working conditions in small- and medium-sized manufacturers. At the onset of the pandemic, SCORE training helped factories plan their production schedule, reorganize production lines, and implement guidelines for more social distance and increased safety. We worked with Suppliers in India and China to provide them training and assistance in implementing improvement plans across five areas: workplace cooperation, health and safety, quality management, clean production, and human resources. Through SCORE, we have provided training on workplace health and safety to 4,398 workers in our supply chain. As of June 2021, Amazon suppliers enrolled in SCORE training have completed 1,517 projects to improve workplace health and safety, drawing from the 1,219 improvement recommendations submitted by workers. Eight sites have achieved SCORE participation certificates from SCORE Academy, demonstrating they have integrated the SCORE methodology into their policies and operations.
- We provided seed funding to help launch BSR's HERessentials, a venture that digitizes HERproject's and Empower@Work's learning curriculum into eight modules geared for workers and two modules geared for managers. The topics covered include: personal hygiene, reproductive health and breastfeeding, and financial planning, and offers local resources on mental health and domestic violence services. HERessentials will be available to workers and managers in Bangladesh, India, Pakistan, Kenya, and Central America, and will be culturally adapted to each geography and translated into local languages.



- We partnered with Nest, a nonprofit supporting the growth and development of the global artisan sector to build a world of greater gender equity and economic inclusion. As part of this partnership, we provided funding for over 100 COVID-19 economic relief grants, which Nest distributed to craft businesses in their open-access Nest Guild. The Nest Guild is an open access network of over 1,000 mission-driven artisan and maker businesses across over 100 countries who can access a host of free business development resources, mentorship from industry experts, and growth opportunities offered by Nest and its corporate partners. We were also able to support Nest's PPE Purchasing Initiative, a program that purchased over 200,000 protective masks from artisan and maker businesses from the Nest Guild which were in turn delivered to frontline workers. In 2020, this program provided over \$500,000 in economic relief to 57 businesses, which altogether employed 10,510 skilled artisans.
- At the onset of COVID-19, Amazon partnered with Swasti, a global non-profit committed to ensuring access to quality healthcare for workers in marginalized communities. Swasti adjusted its flagship Invest4Wellness program to help protect the most marginalized from COVID-19, including providing support to workers in factories. With our support, Swasti set up a worker helpline, developed health protocols for workers to return to work safely, and provided critical mental health, healthcare, and social entitlement support to workers, their families, and their communities. Swasti trained worker-led response teams on COVID-19 prevention and management; the teams educated other workers by showing videos on the factory floor and posting critical health information. Swasti also provided remote health care to workers and reached out to workers and their family members to identify COVID-19 risks and provide medical support. When Swasti identified a pandemic-related food shortage at a program site, it distributed food to employees who were in need.

- We increased our investment in Amader Kotha, meaning 'Our Voice' in Bengali, a helpline that provides workers in the Bangladesh ready-made garment sector a safe and effective way to report and resolve workplace issues. Our contribution helps support the organization's increased call volumes and the 24/7 factory grievance lines in regions impacted by COVID-19. The Helpline serves as a resource for 600+ factories, reaching 1.5 million workers in Bangladesh and supporting them in safely transitioning back into the workplace. In 2020, we enrolled 23 Amazon suppliers in Amader Kotha's program. For every worker call, the helpline follows a defined protocol to address the reported issue until it is resolved with their employer.

**We are looking ahead to determine how we can best focus our efforts to mitigate the increased risk of modern slavery for workers in our supply chain due to COVID-19.**

In 2020, we worked with Better Buying, an initiative working to improve purchasing practices in global supply chains, to conduct a survey of our suppliers in Vietnam and their workers. The survey focused on the impacts of our practices during COVID-19. We received over 1,300 worker responses, indicating their primary concerns were unstable personal finances related to business uncertainty during COVID-19, changes to forecasted orders, and factory safety concerns linked to shipment date pressures. Suppliers gave positive feedback on several aspects of our practices, including our increased communication during COVID-19, decisions to honor orders, and flexibility on delivery times. With these insights and other information we are collecting through our human rights due diligence efforts, we are continually assessing our programs and protocols and looking for additional ways to support our stakeholders in mitigating the impacts of COVID-19 and increased risks of modern slavery.

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



## Engagement with strategic stakeholders

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

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Amader Kotha	Amazon began working with the Amader Kotha Helpline in 2020. The Amader Kotha Helpline provides workers with a mechanism to report and resolve safety and other concerns in the ready-made garment sector in Bangladesh. The Helpline was initially established as a project of the Alliance for Bangladesh Worker Safety following the Rana Plaza tragedy. In 2018, the Helpline became an independent initiative available to all garment workers with the support of factories and brands. In 2020, Amazon provided financial support to Amader Kotha during COVID-19 and enrolled 23 suppliers in the hotline.
amfori	In 2019, Amazon began working with amfori, a leading global business association for open and sustainable trade. amfori brings together over 2,500 retailers, importers, brands, and associations from over 40 countries to drive social performance and improvements across global supply chains. We accept Business Social Compliance Initiative (amfori BSCI) audits as part of our Supplier due diligence program.
Better Buying	In 2019, Amazon began engaging with Better Buying, a leading global initiative committed to reimagining supply chain sustainability and leveraging data to strengthen supplier-buyer partnerships by improving purchasing practices. Better Buying's cloud-based platform enables suppliers to anonymously rate the purchasing practices of their buyers, providing data-driven insights which can be used by retailers, brands, and suppliers to continuously improve purchasing practices and achieve mutually beneficial sustainability outcomes. In 2020, we worked with Better Buying to conduct a survey of our Suppliers and their workers on the impacts of our purchasing practices during COVID-19.
Better Work	We require Amazon-branded suppliers in a number of regions to enroll in Better Work—a partnership between the International Labor Organization and the International Finance Corporation, a member of the World Bank Group, focused on improving working conditions and respect for labor rights and making the global garment sector more competitive. By working with factories and training workers on their rights, Better Work supports greater compliance with national labor laws and international labor standards.
Better Cotton Initiative	Amazon is a member of the Better Cotton Initiative (BCI) to support the transition to sourcing more sustainable cotton within Amazon-owned Private Brand apparel products. In 2020, Amazon joined other brands as a member of Better Cotton Initiative's Retailer and Brand Advisory Panel on Traceability.

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Business for Social Responsibility	Amazon is a member of BSR, a global organization that works with partners across business, civil society, and government sectors to build a just and sustainable world. In 2020, we provided seed funding to help launch BSR's HERessentials, a venture that digitizes HERproject's and Empower@Work's learning modules into a Toolkit for remote access.
The Centre for Child Rights and Business	Amazon joined the Centre for Child Rights and Business (the Centre) in early 2021. The Centre offers services and support covering a broad range of child rights and well-being issues including responsible recruitment practices with a focus on child labor prevention and remediation, child rights risks assessments, support packages for young workers and other vulnerable groups, and a comprehensive set of services to create family-friendly workplaces in supply chains.
International Organization for Migration	The International Organization for Migration (IOM), a United Nations organization that supports migrants across the world including those in emergency situations, develops effective responses to the shifting dynamics of migration and is a key source of advice on migration policy and practice. Amazon is partnering with the IOM Corporate Responsibility in Eliminating Slavery and Trafficking (CREST), a regional initiative that supports companies in upholding the human and labor rights of migrant workers, to develop critical supplier training to address recruitment practices in Japan. In 2020, we also worked with IOM to distribute supplies to IOM-managed health facilities during COVID-19.
Nest	Amazon partners with Nest, a non-profit supporting the growth and development of the global artisan sector to build a world of greater gender equity and economic inclusion. Through their Ethical Handcraft program, which protects the rights of handworkers in the informal sector, and a host of artisan and maker business development programs, Nest is bringing radical transparency and opportunity to the global handworker economy. Amazon is proud to serve on Nest's Steering Committee.
Polaris	Polaris is a nonprofit leading a social justice movement to fight sex and labor trafficking at massive scale. For more than a decade, Polaris has assisted thousands of victims and survivors through the US National Human Trafficking Hotline and built the largest known US data set on the crime. AWS works with Polaris to infuse cutting-edge technology into its infrastructure to accelerate the development of the largest known US data set on trafficking.
Public-Private Alliance for the Responsible Minerals Trade	Amazon joined the Public-Private Alliance for Responsible Minerals Trade (PPA) in 2020. The PPA is a multi-sector initiative among leaders in civil society, government, and industry to support projects in the Democratic Republic of the Congo and the surrounding Great Lakes Region of Central Africa that improve the due diligence and governance systems needed for ethical supply chains.

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Responsible Business Alliance	Amazon is a member of the Responsible Business Alliance (RBA), a nonprofit coalition of companies committed to supporting the rights and well-being of workers and communities worldwide affected by global supply chains. We accept RBA Validated Assessment Program (VAP) audits as part of our Supplier due diligence program.
Responsible Labor Initiative	Amazon is a member of the Responsible Labor Initiative (RLI), a multi-industry, multi-stakeholder initiative run by the RBA. The RLI is focused on ensuring that the rights of workers vulnerable to forced labor in global supply chains are consistently respected and promoted.
Responsible Minerals Initiative	Amazon is a member of the Responsible Minerals Initiative (RMI), an initiative of the RBA, which provides companies with tools and resources to make sourcing decisions that improve regulatory compliance and support responsible sourcing globally. Amazon participates in RMI working groups devoted to cobalt, mica, and smelter engagement.
The Responsible Sourcing Network initiative YESS™	In 2021, Amazon is sponsoring and participating in Responsible Sourcing Network initiative YESS™: Yarn Ethically & Sustainably Sourced. YESS works to address forced labor in the cotton value chain by providing training to, and managing the assessment of, spinners and fabric mills to identify and address forced labor in cotton production.
StolenYouth	Amazon partners with StolenYouth, a Seattle-based organization with the mission to end child sex trafficking in the state of Washington through prevention, connecting trafficked youth to resources and services, and empowering survivors along their path to recovery and a promising future. We support StolenYouth by providing both financial support and goods donations.
Sedex	Amazon is a member of Sedex, a global membership organization that empowers companies to build responsible supply chains. Sedex provides businesses with a comprehensive data platform, practical tools and resources to operate ethically, source responsibly, and work with their Suppliers to create fair working conditions for the people who make their products and services. We accept Sedex Members Ethical Trade Audit (SMETA) audits as part of our Responsible Sourcing Program.
Sustainable Apparel Coalition	Amazon is a member of the Sustainable Apparel Coalition (SAC), a global, industry-wide group of more than 250 leading apparel, footwear, and textile brands, retailers, suppliers, service providers, trade associations, non-profits, NGOs, and academic institutions working to reduce environmental impact and promote social justice throughout the global value chain. The SAC recently celebrated 10 years of bold progress, culminating in its signature achievement—the completion of the Higg Index, a suite of tools for the standardized measurement of value chain sustainability.

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Swasti	Amazon partners with Swasti, a global nonprofit committed to ensuring access to quality healthcare for workers in marginalized communities. With our support, Swasti set up a worker helpline, developed health protocols for workers to return to work safely, and provided critical mental health, healthcare, and social entitlement support to workers, their families and their communities.
Tech Against Trafficking	Amazon is a Steering Committee Member of Tech Against Trafficking, a coalition of companies collaborating with global experts to help eradicate human trafficking using technology.
Thorn	Thorn is an organization that builds technology to defend children from sexual abuse, leveraging AWS architecture and machine learning tools in their product Spotlight. Spotlight's sophisticated machine learning capabilities save time for investigators by automatically flagging ads likely to represent at-risk children.
Truckers Against Trafficking	Amazon is an official corporate sponsor of Truckers Against Trafficking, an organization dedicated to combating human trafficking in the trucking industry.
United States Council for International Business	Amazon is a member of the United States Council for International Business (USCIB). As the US member of the International Organization of Employers, USCIB represents American business on the Governing Body of the ILO, and engages with US and international policymakers for policies that support respect for human rights under the UN Guiding Principles on Business and Human Rights, including on issues of forced labor and human trafficking.
Unseen	Amazon sponsors Unseen, a U.K. anti-slavery charity that operates the U.K. Modern Slavery and Exploitation Helpline and provides immediate and long-term support to potential victims of modern slavery.

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## Our Commitments and Progress

We are proud of the significant progress we have made to further respect and advance human rights throughout our business, including actions to prevent and address modern slavery risks. We regularly measure our progress against our commitments. As our program grows, we look forward to further engaging in company-wide efforts to address risks posed by modern slavery.

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### Commitment

### Progress Against Commitments in 2020

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Regularly review and update our policies and assessment processes

**We completed foundational assessments of our human rights risks:**

We completed a review of Amazon's salient human rights risk.

We conducted our first Human Rights Impact Assessment (HRIA) to identify actual and potential impacts and risks across the raw and recovered materials supply chain for our Amazon-branded devices.

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Grow our partnerships with organizations that are combatting modern slavery

**We invested in new partnerships and stakeholder collaborations:**

Public-Private Alliance for the Responsible Minerals Trade

Better Cotton Initiative's Brand Steering Committee for Traceability

Responsible Sourcing Network initiative YESSTM: Yarn Ethically & Sustainably Sourced

International Organization for Migration

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Expand our training and capacity-building efforts

**We implemented training programs in multiple parts of our business:**

We incorporated anti-trafficking training into the onboarding requirements for all Amazon employees who are behind the wheels of trucks in our middle-mile business, and, as of January 2021, we trained 100% of those employees on the Truckers Against Trafficking curriculum.

We have a goal to offer training on modern slavery awareness to 100% of our fulfillment operations managers.

We engaged Verité to develop a Responsible Recruitment Guidebook.

We sponsored the Responsible Labor Initiative's responsible recruitment trainings in Malaysia and Taiwan and enrolled 31 of our Suppliers.

We are partnering with the International Organization for Migration to conduct research on the legal frameworks governing migrant workers in Japan and the challenges and vulnerabilities migrant workers face.

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Regularly review and improve our supply chain due diligence efforts

We raised our sourcing requirements to include full reimbursement of recruitment fees as a core requirement for production of Amazon-branded products in order to ensure responsible recruitment of migrant workers.

We adjusted our assessment processes and protocols to take into account the challenges posed by COVID-19, while also monitoring for indicators of modern slavery.

We are conducting a materiality assessment and developing a holistic commodity risk framework to better identify and understand the upstream risks and priority commodities in our supply chain and develop strategies for mitigating those risks.



# Approval & Signature

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

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

Amazon EU SARL, U.K. Branch

*John Boumphrey*

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John Boumphrey  
June, 2021

*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 Furlong*

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Matthew Furlong  
June, 2021

