



Modern Day Slavery Statement

Amazon continually works to prevent slavery and human trafficking from taking place in our manufacturing supply chains and operations, in line with the United Kingdom Modern Slavery Act.

Our Business

Amazon.com opened its virtual doors on the World Wide Web in July 1995. We seek to be Earth's most customer-centric company. We are guided by four principles: customer obsession rather than competitor focus, passion for invention, commitment to operational excellence, and long-term thinking. 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 services and co-branded credit card agreements. We have organised our operations into three segments: North America, International, and Amazon Web Services ("AWS"). These segments reflect the way the company evaluates its business performance and manages its operations.

Our Operations: We fulfil customer orders in a number of ways, including through: North America and International fulfilment and delivery networks that we operate; co-sourced and outsourced arrangements in certain countries; digital delivery; and through our physical stores. As of December 31, 2018, we employed approximately 647,500 full-time and part-time employees. However, employment levels fluctuate due to seasonal factors affecting our business. Additionally, we utilize independent contractors and temporary personnel to supplement our workforce. We have works councils and statutory employee representation obligations so that we can engage directly with our workers to maintain and encourage open dialogue.

Our Supply Chain: Amazon is committed to improving the working conditions of people around the world who are a part of our supply chain. Amazon sources products for many of its businesses around the world, including sourcing private label products in several industries (including electronics, fashion, consumables, and furniture). With manufacturers spanning the Americas, Asia, Australia, Europe, and Africa, we recognize the need to monitor for conditions that put workers at risk of forced labour.

Policies and Controls

Amazon's internal Code of Business Conduct and Ethics sets out guiding principles and establishes that in performing job duties Amazon employees should always act lawfully, ethically, and in the best interests of Amazon.

Amazon has set clear standards on the prevention of forced labour in its supply chain through its [Supplier Code of Conduct](#) (“Supplier Code”), a set of standards required of all manufacturing suppliers, and service providers supporting Amazon's internal operations. Amazon's purchase and service agreements require our manufacturing suppliers, and service providers supporting Amazon's internal operations (e.g. call centers, delivery and fulfillment providers) to comply with our Supplier Code of Conduct.

We evaluate and address risks of modern slavery and human trafficking in the Supplier Code which states, among other standards, that:

- Our suppliers must not use forced labour - slave, prison, indentured, bonded, or otherwise.
- Our suppliers must not traffic workers or in any other way exploit workers by means of threat, force, coercion, abduction, or fraud. Working must be voluntary, and workers must be free to leave work and terminate their employment or other work status with reasonable notice.
- Workers shall not be required to pay recruitment, hiring, or other similar fees related to their employment; our suppliers must bear or reimburse to their workers the cost of any such fees. All fees and expenses charged to workers must be disclosed to Amazon and communicated to workers in their native language in advance of employment.
- Our suppliers must not require workers to surrender government issued identification, passports, or work permits as a condition of working, and our suppliers may only temporarily hold onto such documents to the extent reasonably necessary to complete legitimate administrative and immigration processing.
- Workers must be given clear, understandable contracts regarding the terms and conditions of their engagement in a language understood by the worker.
- Suppliers must ensure that each of its staffing or recruiting agencies comply with this Supplier Code and with the more stringent of the applicable laws of the country where work is performed and the worker's home country.

Risk Assessment

We use a combination of desk-based research, supply chain mapping against existing human rights indices, as well as internal and industry audit results to analyse the risk of modern slavery in our supply chain and operations. While modern slavery can be found in all countries and industries, we acknowledge that there is a heightened risk with:

- domestic and international migrant labour;
- contract, agency, and temporary workers;
- vulnerable populations (e.g. refugees); and
- young, or student workers.

In addition to the controls listed below, this year Amazon launched a process to investigate suppliers with a heightened risk of modern slavery specifically in relation to migrant workers.

Our process focuses on listening to workers' perspectives about their recruitment experience and working/living conditions, and relating anonymous feedback from workers directly to management to drive improvement. In addition, we are expanding regional teams to engage with suppliers in high-risk regions, and working with industry programmes, such the Responsible Workplace Program currently operating in Malaysia.

Due Diligence Processes

Amazon assesses manufacturing suppliers and service providers for continued compliance and improvement. Amazon uses a risk-based approach to determine the frequency of assessments and which manufacturing suppliers and service providers should be assessed. Many sites are assessed multiple times a year, including through follow-up assessments to address specific findings. Amazon may terminate its relationships with any supplier that violates our Supplier Code or does not cooperate during assessments. Assessments may include:

- Site inspection of all areas of the site and any living quarters;
- Confidential worker interviews or surveys conducted without site management present;
- Review and analysis of site documents or licenses to assess workers' age, contracts, compensation, working hours, and workplace conditions;
- Identification of past compliance issues, areas for improvement, and development of a remediation plan.

Audit reports and findings are reviewed regularly by senior leadership and corrective action plans are implemented as needed. Amazon tracks remediation closely and conducts follow-up audits for significant issues. Between audits, Amazon employees meet on-site with supplier managers to discuss open issues and remediation progress.

Suppliers are required to remediate violations of Amazon's Supplier Code of Conduct. Suppliers must submit a Corrective Action Plan (CAP) providing both a root cause analysis and a description of remedy. Amazon evaluates CAPs in light of the severity level of the violation.

Partnerships and Stakeholder Engagement

To ensure that our policies and programs incorporate internationally recognized human rights standards, we conduct formal benchmarking with industry and multilateral groups to design, operate, and continually improve our risk assessment and audit program.

Amazon aligns with industry associations to collaborate on key issues and leverages their standardised assessments. Amazon is member of the Responsible Business Alliance (RBA), has committed to implement the [RBA Code of Conduct](#), leverages their standardised audits and participates in their working group on forced labour, the Responsible Labor Initiative (RLI). The RLI is a multi-stakeholder initiative, which develops resources, trainings, and strategies to

address modern slavery. The RLI also works with labour agents and suppliers to understand the obstacles to remediation and identify potential solutions.

Amazon is also a member of the Supplier Ethical Data Exchange (Sedex) and in 2019, Amazon began working with amfori's Business Social Compliance Initiative. We partner with these organisations to use their globally-recognised social assessments to reduce audit duplication in our supply chain.

Forced labour cannot be solved in isolation. In 2019, Amazon joined Responsible Sourcing Network's public pledge to not source cotton from [Turkmenistan](#) and [Uzbekistan](#). On top of our existing controls, we are proud to lend our voice in demanding an end to the use of government-mandated forced labour in these two countries. Amazon is also actively participating in Business and Social Responsibility's Tech Against Trafficking working group. Tech Against Trafficking's mission is to bring together a coalition of technology companies to work with civil society, law enforcement, academia, and modern slavery survivors to identify and create technology-driven solutions that disrupt and reduce human trafficking; that prevent and identify crimes; and that provide remedy mechanisms for victims and support survivors through innovation, collaboration, guidance, and shared resource.

Assessment of Effectiveness

Suppliers manufacturing Amazon private label products are assessed for compliance with Amazon's Supplier Code of Conduct before Amazon begins ordering products, and we expect all of our suppliers and service providers to meet the standards in our Supplier Code of Conduct as a condition of doing business with us. These facilities must demonstrate the absence of any issue that has caused or is likely to cause immediate harm to workers or communities, or demonstrates egregious unethical behavior, including the use of forced or indentured labour, or human trafficking. In the event an issue that has caused or is likely to cause severe harm to workers is identified prior to beginning a relationship with Amazon, the issue must be resolved before, and as a condition of, initial production and to qualify for continued production with Amazon. Amazon's sourcing teams have each taken on Social Responsibility goals to monitor for these conditions at an executive leadership level; performance against these goals is regularly reported to leadership.

The Social Responsibility team consults with Amazon business teams on new sourcing geographies and sourcing teams are responsible for reviewing supplier performance before moving to production.

Support and Capacity Building

We offer suppliers training to help understand Amazon requirements before audits, effectively navigate the Corrective Action Plan (CAP) process, and design and implement sustainable management systems after an audit. We have dedicated teams that work directly with

suppliers and service providers in major geographies. We offer on-site and remote training to support continuous improvement. Suppliers are also encouraged to participate in external training programs, such as industry association tutorials related to recognizing and preventing forced labour and implementing management systems. We are continuously exploring ways to use Amazon's expertise to expand this support.

Employees of Amazon take mandatory compliance training courses on the Code of Business Conduct and Ethics, Anti-Bribery Compliance, and Workplace Harassment. Additionally, the Amazon.com Legal Department has developed and maintains reporting guidelines for employees who wish to report violations of the Business Code of Conduct and Ethics. These guidelines include information on making reports to the Legal Department and to an independent third party. This year, Amazon launched training at our fulfilment operations in the UK on identifying and reporting suspected instances of modern slavery.

Approval for This Statement

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

Amazon EU SARL, UK Branch

Doug Gurr

A handwritten signature in black ink that reads "Doug Gurr". The signature is fluid and cursive, with "Doug" on the first line and "Gurr" on the second line.