

April 20, 2026

Dear Amazon Shareholder,

We urge you to vote AGAINST the re-election of Jonathan Rubinstein, Jamie Gorelick, and Andrew Ng, members of the Nominations and Corporate Governance Committee (Nom and Gov Committee), and Patricia Stonesifer, former member of the Nom and Gov Committee, for their decision this year to unilaterally exclude new shareholder proposals filed at Amazon (Amazon or the Company).¹ We believe the Board has failed to meaningfully engage shareholder proponents, respond constructively to votes, or refresh the committee overseeing its governance practices. These written materials are shared pursuant to an exemption provided for in Rule 14a-2(b)(1) promulgated under the Securities Exchange Act of 1934.

Charged with “[overseeing] the Company’s corporate governance initiatives...,”² we believe that responsibility for Amazon’s decision to omit certain shareholder proposals falls principally on the Nom and Gov Committee. Further, our understanding is that over the past year this committee was comprised of the three longest tenured independent directors on Amazon’s Board, with Ms. Stonesifer serving since 1997, Mr. Rubinstein since 2010, and Ms. Gorelick since 2012. Ms. Gorelick is also Amazon’s Lead Independent Director.³

We note that all three of the proposals discussed below were excluded based on substantive issues, and proponents fulfilled the procedural requirements for a valid filing.⁴ The text of each proposal is reproduced in Appendix 1-3. We further note that for the Immigration Related proposal and the Disclosure AI Alignment proposal, Amazon’s “engagement” on each proposal was limited to one phone call with the respective proponent, in which Amazon’s representatives announced their intention to exclude the

¹ On page 20 of Amazon’s 2026 Proxy Statement, Ms. Stonesifer is listed as a “current” member of the Leadership Development and Compensation Committee, and Mr. Ng as a member of the Nom and Gov Committee. It is unclear whether changes to the Nom and Gov Committee’s membership took place before or after the January 30th and February 5th, 2026 no action requests, so we are placing the responsibility on both Directors Stonesifer and Ng. We are unable to find any public announcements regarding announcing these changes.

² Amazon Nominating and Governance Committee Charter, <https://ir.aboutamazon.com/corporate-governance/documents-and-charters/nominating-and-corporate-governance-committee/default.aspx>

³ Amazon 2026 Proxy Statement filed on Form DEF 14A on April 9, 2026, pg. 21.

⁴ This includes timely filing prior to the deadline and providing an ownership statement sufficient to meet the holding period and ownership threshold requirements.

proposal.⁵ In our view, this action appears to be a deliberate attempt to allow the Company to assert that it “engaged” with the proponent, without having done so in good faith.⁶

Amazon’s Suppression of Shareholder Voice Stands Out Among Issuers

In November 2025, the Securities and Exchange Commission (SEC) took the unusual step of announcing that, with limited exceptions, it will not respond to “no action” requests made by companies to determine whether a “14a-8” shareholder proposal should be included in the proxy statement for the 2026 proxy season.⁷ In practice, the policy results in the agency relying exclusively on a company’s stated justifications for omissions without review or comment.

While questions about the legality of the SEC’s announcement remain,⁸ most issuers have **not been exploiting** the opportunity to unilaterally block shareholder proposals. According to research by ISS STOXX, through February 18, 2026, 71% of proposals were proceeding to a vote, a higher rate than in any of the previous five years. Indeed, according to this research, the proportion of omitted proposals in 2026 – 22% - is well below 2025’s 28% and comparable to 2024’s 21%.⁹ Notably, some issuers that have sought to exclude proposals in past years have chosen not to do so this year: Coca-Cola did not seek to exclude any of the five proposals submitted this year, after seeking to exclude at least one proposal every year since 2020, including two in 2025.¹⁰

In part, issuers’ reluctance to exclude proposals stems from uncertainty with respect to the consequences of such exclusions, such as litigation brought by proponents.¹¹ So far, AT&T,

⁵ It is unclear to us whether a similar “engagement” took place on the Human Rights Report proposal.

⁶ Amazon’s refusal to engage in good faith is particularly frustrating given that the SOC Investment Group has constructively engaged with Amazon in the past, including withdrawing its 2018 proposal on board diversity following the Amazon Board’s reversal of its initial opposition, discussions seeking to settle concerns raised in a 2019 proposal on Inequitable Employment Practices, and a single conversation in 2023 to discuss a co-filed proposal concerning freedom of association and collective bargaining that had been supported by 38.5% of shareholders at Amazon’s 2022 annual meeting.

Julie F. Rizzo, and Leigh S. Krafchek. “SEC No Longer a ‘Referee’ in the Shareholder Proposal Process.” K&L Gates, November 24, 2026.

⁸ Interfaith Center on Corporate Responsibility and As You Sow vs. Securities and Exchange Commission et. AL., Case 1:26-cv-00957 US District Court for the District of Columbia filed March 19, 2026.

⁹ Subodh Mishra, ISS STOXX “Proxies in Uncharted Waters: 2026 U.S. Proxy Season Preview” published on the Harvard Law School Forum on Corporate Governance blog, March 17, 2026.

¹⁰ Jack Grogen-Fenn, “Coca-Cola Caution: No ‘No Action’ Requests Filed for First Time Since 2020” Minerva Analytics, March 18, 2026.

¹¹ SOC Investment Group and Investor Advocates for Social Justice, as proponent and proponent representative, respectively, of two of the proposals described below have instead decided to bring our case to fellow shareholders in part due to cost, but also because of Amazon’s engagement practices with proponents gave us little confidence that litigation would be settled quickly. We further believe that shareholders deserve an opportunity to demonstrate support for preserving shareholder voice when boards act in a way that may diminish what we consider to be a key right of investors.

Axon, and PepsiCo have each agreed to allow proposals to be voted after attempting to exclude them, as a result of litigation brought by proponents.¹² Law firms have also issued public commentary on the current state of the shareholder proposal process and have encouraged issuers to engage with proponents prior to making any decision concerning exclusion.¹³ Amazon, by contrast, has not followed these public admonishments, and chose to exclude new and material proposals without meaningful engagement with the proponents.

Amazon Has a History of Performative Engagement.

In our experience, Amazon is unusually, and perhaps uniquely, unwilling to meaningfully engage with shareholder proponents. In 2022, public pension funds and state treasurers urged shareholders to oppose the re-election of two directors in part based on the Board's unwillingness to discuss their concerns over Amazon's human capital management practices.¹⁴ In 2024, a lead filer resubmitted a proposal asking for a third-party assessment of the alignment between Amazon's practices and its human rights policy commitment to respect freedom of association. Despite the 2023 version of the proposal receiving 34.6% support, Amazon declined repeated requests to engage, stating that, in their view, any discussion would be unproductive.¹⁵

Further, in addition to excluding the Disclosure of AI Alignment proposal (described below) without any engagement, Amazon has refused to discuss the proposal's underlying concerns with proponents and Investor Advocates for Social Justice (IASJ), as a representative, since 2020,¹⁶ despite proponents filing shareholder proposals on other topics that attracted high vote totals, including over 40% support in 2022 and over 30% in 2020, 2021, and 2023.¹⁷ Lastly, as documented on the SEC's website listing issuer "No

¹² Andrew Ramonas and Drew Hutchinson, "Investors Suing to Vote on ESG Proposals Meet Corporate Pushback," Bloomberg Law, March 30, 2026, <https://news.bloomberglaw.com/esg/investors-suing-to-vote-on-esg-proposals-meet-corporate-pushback>

¹³ Remy S. Farkas, et. al., "SEC Reshapes Shareholder Proposal Review: A New Approach for the 2026 Proxy Season" Holland and Knight Alert, February 2, 2026; Roger A. Cooper, et. al., "Lawsuits Filed Under SEC's Revised Rule 14a-8 No-Action Letter Process" Cleary Gottlieb, February 24, 2026.

¹⁴ Letter to Shareholders, April 21, 2022, New York City Funds, New York State Common Retirement Fund, and Office of the Illinois State Treasurer, <https://www.sec.gov/Archives/edgar/data/1018724/000121465922005572/e420220px14a6g.htm>

¹⁵ Letter to Shareholders, May 3, 2024, Shareholder Association for Research and Education, <https://www.sec.gov/Archives/edgar/data/1018724/000121465924008259/o53240px14a6g.htm>. 2023 vote results sourced from Diligent database. We note that SOC Investment Group was a co-filer of this proposal.

¹⁶ Amazon stated it was "impossible" to have a conversation about end-use monitoring and due diligence processes due to "proprietary and confidential contractual information," and instead offered a "listen-only meeting." IASJ believes the listen-only meeting is neither "meaningful," nor "dialogue."

¹⁷ The proposal's support levels were as follows: 2020 32%, 2021 35.3%, 2022 40.25%, 2023 34.2%, 2024 16.8%. Calculations based on Amazon 8-K's disclosures of each year's annual meeting.

Action” requests, Amazon has routinely sought to exclude additional proposals that address significant Company risks, and has done so even after strong showings of shareholder support.¹⁸ This pattern of behavior reinforces our impression that Amazon’s decision to exclude these proposals was opportunistic, far from the behavior associated with an effective governance committee.

The Proposals Amazon Doesn’t Want You to Know About

Disclosure of US Immigration Policy Risks Submitted by SOC Investment Group

This proposal requested a report on the impact of changing US immigration policies on the Company’s operations.¹⁹ The proponents believe changes in US immigration policy may put Amazon at risk of losing valuable human capital, given its apparent reliance on immigrant workforces in its supply chain and own operations.

In its notification to the SEC that it would be excluding the proposal, Amazon asserted that that the proposal was excludable as ordinary business and was not based on a “significant policy issue.” While minor changes to immigration policy may have limited or no effect on many companies, the Trump Administration’s current policies and practices, in our view, are not among them. Since filing this proposal, reports and surveys routinely show employers in agriculture, warehousing, transportation, and construction – among other industries – are struggling to find labor and warning of supply shortages, all of which are pertinent industries to Amazon’s business model.²⁰ Large-scale enforcement efforts have not only sparked mass protests covered by national news outlets, but also boycotts of employers perceived to be unnecessarily cooperating with such efforts.²¹ Shareholders should have had the opportunity to decide on the need for additional disclosure, rather than the Company unilaterally deciding under the leadership of the Nom and Gov Committee.

¹⁸ For instance, in 2025 Amazon sought to exclude proposals concerning plastics packaging, freedom of association, and warehouse working conditions that in 2024 received support from 28%, 31.5%, and 31% of shares voted, respectively.

¹⁹ Proposals with identical resolved clauses were also submitted to Walmart and Alphabet for the 2026 proxy season. Neither company submitted a no action request.

²⁰ “Trump Immigration Policy Wreaking Havoc on U.S. Food Production, Say Former Agriculture Leaders.” SupplyChainBrain, <https://www.supplychainbrain.com/articles/43404-trump-immigration-policy-wreaking-havoc-on-us-food-production-say-former-agriculture-leaders>; Gardner, Alexia. “The Loss of America’s Truckers: The Revocation of Commercial Driver’s Licenses from Refugees and Asylees.” U.S. Committee for Refugees and Immigrants (USCRI), 29 Oct. 2025,

²¹ Melissa Repko, “Target Faces AFT Boycott over ICE Response in Minneapolis.” CNBC, 26 Mar. 2026, <https://www.cnbc.com/2026/03/26/target-aft-boycott-ice-minneapolis.html>

Disclosure of AI Alignment Proposal Submitted by American Baptist Home Mission Societies (ABHMS) (Represented by IASJ) and 30 Other Investors

This proposal asked for a report describing the alignment between Amazon’s sale and deployment of AI and related technologies with the Responsible AI Approach Amazon adopted in 2023.²² The proposal highlighted recent concerns around the use of Amazon technologies in the US immigration enforcement operations and in the context of its Project Nimbus contract with Israel.

In omitting this proposal, Amazon asserted that the proposal was substantially similar to a prior proposal that failed to meet the resubmission threshold.²³ However, there are evident differences between the prior proposal from 2024 – which asked Amazon about its customer due diligence processes in connection with international human rights standards – and the proposal excluded this year. While this year’s proposal focused on Amazon’s development, facilitation, and sale of AI-related technologies, the terms “AI” and “artificial intelligence” were not mentioned in the prior proposal cited by Amazon in its no action request²⁴ In addition, the prior proposal was concerned with Amazon’s customer due diligence processes according to international frameworks, while this year’s proposal highlighted misalignment risks related to Amazon’s own Responsible AI approach. As such this year’s proposal cannot be considered substantially similar to the prior proposal mentioned.

Report on the Effectiveness of Policies and Practices to Respect International Human Rights Standards Submitted by Catherine Donnelly Foundation and other filers.

The third new proposal that Amazon excluded from this year’s proxy statement asks the Board to prepare a report evaluating the effectiveness of Amazon’s policies and practices to respect internationally recognized human rights standards, including the ILO’s Core Conventions and Declaration on Fundamental Principles, with a clear focus on the freedom of association and the right to collective bargaining.²⁵ The proposal asks that this report cover both Amazon’s own operations and its supply chain.

In its argument supporting its decision to exclude this proposal based on substantial implementation,²⁶ Amazon cites sources from its Annual Sustainability Report or on its

²² Amazon Responsible AI website, <https://www.aboutamazon.com/what-we-do/artificial-intelligence-ai/responsible-ai>.

²³ See Amazon’s submission to the SEC on January 30, 2026: <https://www.sec.gov/files/corpfm/no-action/14a-8/americanbaptisthomeamazon13026.pdf>

²⁴ See *Ibid.*, pgs. 13-37.

²⁵ See Amazon’s February 5, 2026 submission to the SEC: <https://www.sec.gov/files/corpfm/no-action/14a-8/ibvmfoundationamazon2526.pdf>

²⁶ See *Ibid.*, pgs. 2-12.

website. Notably, however, many of these audits and reports– including the reports on child labor and forced labor – appear only to have covered Amazon’s supply chain, and not its own operations. Moreover, the supporting statement for the proposal cites multiple examples from the past two years in which Amazon was either alleged to or was determined by a responsible authority to have taken actions clearly inconsistent with respect for the freedom of association and the right to collective bargaining. Finally, over the past year, there have been multiple reports of illegal child labor and other violations at companies that reportedly supply Amazon with various products, including clothing.²⁷ Clearly, audits conducted in the past cannot assure compliance with human rights standards in the present or future, which was the focus and purpose of this proposal.

Amazon Should Rebuild Engagement Through Committee Refreshment

We believe that refreshment of the Nom and Gov Committee is long overdue, and would provide the Amazon Board with an opportunity to identify directors who appreciate shareholder engagement and could oversee meaningful changes to Amazon’s governance practices. We urge Amazon investors to vote against Directors Rubinstein, Gorelick, Ng, and Stonesifer.

This is not a solicitation of authority to vote your proxy. Please DO NOT send us your proxy card as it will not be accepted.

Sincerely,

American Baptist Home Mission Societies

Investor Advocates for Social Justice

Oxfam America

SOC Investment Group

United for Respect Education Fund

²⁷ “New Investigation Shows Amazon Seller Products Made With Forced Labour Concerns.” Labour Behind the Label, <https://labourbehindthelabel.org/press-release-new-investigation-shows-amazon-seller-products-made-with-forced-labour-concerns/>; “Fashion Scandals 2025: Child Labor, Illegal Pesticides.” *NSS Magazine*, <https://www.nssmag.com/en/fashion/39426/fashion-scandals-2025-child-labor-illegal-pesticides>

Appendix 1: Immigration Policy Reporting Proposal

Resolved: Request the Board of Directors provide a publicly available report on how U.S. immigration policy and enforcement impacts Amazon.com Inc.'s ("the Company") operations.

Supporting Statement:

Studies show the presence of H-1B workers in a company boost innovation, patents, and productivity.¹ These foreign skilled workers play a significant role in Amazon's operations; it was the largest sponsor of H-1B worker visas in fiscal year 2025, employing over 10,000 workers with the visa.² In September 2025, President Trump issued a proclamation raising the annual fee on skilled foreign workers from \$215 to \$100,000.³ We believe the impacts of this proclamation on Amazon's operations and future success could be significant. The Company has not disclosed to shareholders how it plans to move forward either without these skilled workers or how it plans to bear the economic strain from the new fees.

H-1B recipients are not the only foreign workers impacted by immigration policy changes. After the Trump administration canceled some humanitarian immigration programs in summer 2025, reports surfaced of multiple Amazon facilities laying off hundreds of workers at once.⁴ These workers were in high demand by Amazon and many had earned praise from management, providing key support in high volume times such as Prime Day or the holidays.⁵

Immigration policy changes could drive up transportation costs for Amazon. Amazon owns over 40,000 semitrucks and 70,000 dry van trailers and works with independent long haul trucking companies as part of their supply chain ecosystem.⁶ Truckers have been targeted by the current administration, with the State Department halting the issuance of worker visas for commercial truck drivers in August 2025,⁷ as well as an executive order in April 2025 which introduced regulations that make it difficult for certain immigrants to operate large vehicles.⁸ The Department of Transportation threatened to withdraw federal funding from certain states if they do not revoke commercial driver's licenses from non-U.S. residents that were determined to be "improperly issued."⁹ The trucking industry already faces a driver shortage, and with 18% of professional drivers being born abroad, there are concerns that this will strain the supply chain and increase transportation costs.¹⁰

Domestically sourced produce plays a large part in Amazon's Whole Foods supply chain; 25% of produce sold in Whole Foods stores comes from local farms, local being defined as within a certain mile radius or

¹ <https://www.cato.org/blog/dont-ban-h-1b-workers-they-are-worth-their-weight-patents>

² <https://www.americanimmigrationcouncil.org/blog/trump-100000-fee-h-1b-visa/>

³ <https://www.cnn.com/2025/09/20/business/h-1b-fee-trump-immigration-workers>

⁴ <https://www.nytimes.com/2025/07/11/technology/trump-immigration-amazon-warehouses.html>

⁵ <https://www.nytimes.com/2025/07/11/technology/trump-immigration-amazon-warehouses.html>

⁶ [https://capitaloneshopping.com/research/amazon-logistics-statistics/;](https://capitaloneshopping.com/research/amazon-logistics-statistics/)

https://www.sec.gov/ix?doc=/Archives/edgar/data/0001018724/000110465925033442/tm252295-1_def14a.htm

⁷ <https://x.com/SecRubio/status/1958644528253948015>

⁸ <https://calmatters.org/economy/2025/11/immigrant-drivers/>

⁹ <https://www.reuters.com/world/us-may-withhold-304-million-minnesota-over-foreign-truck-driver-licenses-2025-12-01/>

¹⁰ <https://www.msn.com/en-us/money/general/ice-crackdown-could-drive-out-614-000-truckers-biggest-labor-shortfall-ever/ar-AA1QmHFy?ocid=BingNewsVerp>

bordering states.¹¹ Immigrants are increasingly relied upon within domestic farms. One study found that unauthorized immigrant crop farmworkers account for 42% of hired crop farmworkers and 25% of all agricultural workers in the United States.¹² A labor shortage due to deportations in the agricultural sector could lead to lower yields and higher costs for consumers and sellers.¹³

We urge fellow shareholders to vote FOR this proposal.

¹¹ <https://www.wholefoodsmarket.com/tips-and-ideas/archive/we-love-local>

¹² https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5384966

¹³ <https://www.newsweek.com/trump-mass-deportation-farms-breaking-point-2064190>

Appendix 2: AI Alignment Reporting Proposal

Alignment Report

Resolved: Shareholders request the Board of Directors conduct an evaluation and issue a public report, at reasonable cost and omitting proprietary information, describing the alignment of Amazon’s sale and deployment of artificial intelligence (AI) and related cloud technologies with its Responsible AI Approach. At the Board’s discretion, the report should list and explain instances of misalignment, and state whether and how the identified incongruencies have or will be addressed.

Whereas: Amazon’s Responsible AI Approach is guided by eight priorities, which include “fairness” (evaluating AI’s impacts on different groups), “privacy and security” (appropriately obtaining and using data), “safety” (preventing harmful system output and misuse), and “transparency” (enabling stakeholders to make informed decisions about their engagement with AI).¹

Despite this approach, Amazon continues to sell to and maintain contracts with entities engaged in rights-violating applications of its AI and related technologies, suggesting misalignment between policies and practice. Such misalignment presents material legal, reputational, regulatory, and litigation risks to Amazon and its investors.

For example, Amazon’s cloud, AWS, is the world’s most broadly adopted cloud and provides cloud computing, artificial intelligence, and data storage.² Its \$1.2 billion cloud computing contract with Israel - Project Nimbus - has been used by Israel in its attacks on Palestinians, actions prominent organizations have classified as genocide.³ Although the contract’s details are not publicly available, a 2024 investigation found Israel had used AWS to store masses of military and surveillance data, and in some cases, to aid in airstrikes that killed many civilians.⁴ An October 2025 investigation revealed the contract prohibits AWS from suspending, withdrawing, or restricting use of its technologies - even if Israel breaches AWS’ terms of service - and requires AWS to violate court-imposed gag orders.⁵

Amazon’s AI and related technologies also enable the US’ expansive immigration crackdown, in which US Department of Homeland Security (DHS) agencies have been accused of arbitrary detentions, silencing free speech, and violating rights to privacy, nondiscrimination, asylum protections, due process, and other human rights.⁶ AWS hosts many DHS databases and systems used to track, monitor, and deport immigrants.⁷ AWS will host DHS’ Homeland Advanced Recognition Technology (HART) system, which will rely on AI to store and process information about immigrants to facilitate detention and deportation.⁸

¹ <https://www.aboutamazon.com/what-we-do/artificial-intelligence-ai/responsible-ai>

² https://aws.amazon.com/what-is-aws/?nc1=f_cc

³ <https://www.un.org/unispal/wp-content/uploads/2025/09/a-hrc-60-crp-3.pdf>

⁴ <https://www.972mag.com/cloud-israeli-army-gaza-amazon-google-microsoft/>

⁵ <https://www.theguardian.com/us-news/2025/oct/29/google-amazon-israel-contract-secret-code>

⁶ https://rfkhumanrights.org/wp-content/uploads/2025/04/FINAL-UPR-Imm.-Coalition-Submission_4.7.25.pdf;

<https://www.youtube.com/watch?v=5zJpvgzxng&t=6s>

⁷ https://mijente.net/wp-content/uploads/2018/10/WHO%E2%80%99S-BEHIND-ICE_-The-Tech-and-Data-Companies-Fueling-Deportations-_v1.pdf

⁸ <https://surveillanceresistancelab.org/wp-content/uploads/2023/01/HART-Attack-2022.pdf>

Amazon's Ring, which produces doorbell cameras and has extensive partnerships with police departments,⁹ recently announced it will enable facial recognition,¹⁰ drawing sharp criticism for creating new privacy and civil liberties risks.¹¹ Additionally, Ring announced a partnership with Flock, a network of AI-powered cameras whose data has been utilized by US Immigration and Customs Enforcement (ICE) in its immigration enforcement,¹² further increasing the risk that Amazon's AI will be misused to violate human rights. Moreover, because of the lack of transparency about the specific ways Amazon's AI and related technologies are being used, investors cannot be assured there is alignment with its commitments.

⁹ <https://www.wbur.org/hereandnow/2025/09/30/ring-police-partnerships>

¹⁰ <https://www.washingtonpost.com/technology/2025/10/03/amazon-ring-doorbell-facial-recognition-privacy/>

¹¹ <https://www.markey.senate.gov/news/press-releases/senator-markey-demands-amazon-abandon-plan-to-include-facial-recognition-technology-in-ring-doorbells>

¹² <https://techcrunch.com/2025/10/16/amazons-ring-to-partner-with-flock-a-network-of-ai-cameras-used-by-ice-feds-and-police/>; <https://www.404media.co/ice-taps-into-nationwide-ai-enabled-camera-network-data-shows/>; <https://www.aclu.org/news/privacy-technology/flock-massachusetts-and-updates>

Appendix 3: Human Rights Report Proposal

Resolved: Shareholders request that the Board of Directors issue a report, prepared at reasonable cost and omitting proprietary and confidential information, evaluating the effectiveness of the Company's policies and practices to respect internationally recognized human rights standards, including the International Labour Organization (ILO) Core Conventions and Declaration on Fundamental Principles and Rights at Work, covering the Company's direct operations and its supply chain, including contractors and subcontractors.

Supporting statement:

Amazon.com, Inc. ("Amazon") has committed "to respect internationally recognized human rights including the ILO Core Conventions and Declaration on Fundamental Principles and Rights at Work."¹ The ten Core Conventions of the ILO establish five fundamental human rights: freedom of association and collective bargaining, elimination of forced labor, abolition of child labor, elimination of discrimination in employment, and occupational health and safety.² Despite these commitments, recent developments raise questions about Amazon's adherence to its stated policies and their effectiveness. An assessment of the effectiveness of these commitments could help Amazon manage potential legal, operational, regulatory, and reputational risks that could result from non-adherence or labor violations.

Several recent findings appear inconsistent with Amazon's stated commitments:

- In November 2024, the National Labor Relations Board (NLRB) ruled that Amazon violated the law by holding "captive audience meetings" and "threatening employees that it would withhold benefits during the mandatory meetings."^{3, 4}
- In August 2024, NLRB alleged Amazon "unlawfully failed and refused to bargain with the union over effects of the decision to terminate the BTS contract."⁵ Amazon denies this claim.⁶
- In September 2025, Amazon was accused of firing over 150 drivers working for a third-party delivery contractor "in retaliation for unionizing." Amazon denies this claim.⁷
- In July 2025, the British Columbia Labour Relations Board ruled that "Amazon's conduct interfered with the formation or selection of the Union, was intimidating and coercive, was motivated by anti-union animus."⁸
- In the UK, GMB trade union filed an inducement claim in 2024 alleging "Amazon displayed anti-union messages throughout its workplaces and union reps were bullied and intimidated."⁹ Amazon denies these claims.¹⁰

¹ <https://sustainability.aboutamazon.com/human-rights/principles>

² <https://www.ilo.org/international-labour-standards/conventions-protocols-and-recommendations>

³ <https://www.reuters.com/technology/us-labor-board-bans-mandatory-anti-union-meetings-ruling-against-amazon-2024-11-13/>
<https://www.nlr.gov/news-outreach/news-story/board-rules-captive-audience-meetings-unlawful>

⁴ <https://www.nlr.gov/case/29-CA-280153>

⁵ <https://www.npr.org/2024/08/24/nx-s1-5088580/amazon-delivery-drivers-nlr-employees-teamsters>

⁶ <https://apnews.com/article/amazon-teamsters-delivery-union-ups-0b9a9e2fc06dbb18cb23c476e0c19230>

⁷ <https://www.theguardian.com/technology/2025/sep/08/amazon-fires-drivers-cornucopia>

⁸ https://www.heise.de/downloads/18/4/9/1/0/3/0/3/2025_BCLRB_131.pdf

⁹ <https://www.lrd.org.uk/news/amazon-workers-pressured-leave-union>

¹⁰ <https://www.theguardian.com/technology/2024/apr/26/gmb-launches-legal-action-against-out-of-control-amazon-at-coventry-warehouse>

- In December 2024, Amazon agreed to implement worker safety measures in response to complaints by the Occupational Safety and Health Administration over hazardous warehouse conditions¹¹ and a Senate investigation alleged Amazon has injury rates more than twice the industry average.¹² Amazon refutes these findings.¹³
- Amazon increased payments to consulting firms “retained in response to large scale union organizing efforts”¹⁴ by 400% between 2023 and 2024, reaching \$12.7 million.¹⁵ An assessment could provide clarity on how these firms are utilized.

These recurring controversies suggest Amazon’s current policies and practices may be ineffective and misaligned with its stated commitments. The requested report is a reasonable step to enhance oversight and disclosure of potential risks to Amazon’s operations, regulatory compliance, and reputation.

¹¹ <https://www.osha.gov/news/newsreleases/osha-national-news-release/20241219>

¹² <https://www.npr.org/2024/12/16/nx-s1-5230240/amazon-injury-warehouse-senate-investigation>

¹³ <https://www.aboutamazon.com/news/policy-news-views/amazon-response-to-senator-bernie-sanders-report-on-workplace-safety>

¹⁴ <https://olmsapps.dol.gov/query/orgReport.do?rptId=914980&rptForm=LM10Form>

¹⁵ https://www.huffpost.com/entry/amazon-anti-union-spending-2023_n_6606cd7ce4b07b59d64d0a42