

Contractor Safety Standards of Conduct
Effective March 2023 Version 1

1.0 Purpose

Amazon.com, Inc. and its affiliates (“Amazon”) are committed to providing a safe and healthy work environment. To achieve this, we take steps to educate all independent contractors, subcontractors, suppliers or visitors (collectively, “Contractors”) that work at our sites, on our safety rules, policies, procedures, and guidelines. We then monitor the workplace for performance and conformance to evaluate when a safety event occurs and the determination of the corrective actions.

The Contractor Safety Standards of Conduct contained in this document is not intended to be an exhaustive list of requirements and prohibitions but identifies many important matters concerning conduct. In addition to the provisions of this document, Contractors are typically subject to all other provisions contained in the Amazon’s Special Safety Conditions (SSCs).

The Contractor Safety Standards of Conduct identifies unacceptable behaviors by Contractors and Contractor personnel and the severity of that behavior. It is impossible to include all behaviors that may pose risk to oneself or others. Therefore, this document provides a list of examples of potentially unsafe behaviors that serve as guidance on the types of behaviors that may result in corrective action, up to and including removal or termination of contract.

2.0 Scope

This document applies to all Contractors performing work on Amazon’s owned or leased Operations sites, as described in any Master Service Agreement (MSA), Master Purchase Agreement (MPA), Master Work Order (MWO), Purchase Agreement (PA), or Purchase Order (PO) agreed upon between Amazon and a Contractor, during or post the sourcing process.

Violation of the Contractor Safety Standards of Conduct may result in dismissal of Contractor’s personnel from Amazon’s sites. In addition, repeated violations may result in termination of contractual relationship with Amazon.

3.0 General Rules Regarding Contractors’ Conduct at Amazon’s Sites

The violation of the following rules may result in immediate dismissal of Contractor’s personnel from Amazon’s sites and property include, but are not limited to:

- Theft or inappropriate removal or possession of property
- Assaulting, threatening, intimidating or coercing
- Use or possession of dangerous or unauthorized materials such as hazardous chemicals or explosives, or use or possession of firearms, knives, explosive devices of any kind, or weapons of any kind
- Possession, distribution, sale, transfer or use of alcohol or illegal drugs
- Fighting or threatening violence in the workplace
- Sexual or other unlawful or unwelcome harassment
- Falsification of personnel or other documents/records

4.0 Safety Standards of Conduct Applicable to Contractors

Contractor incidents and/or violations that originate from audits findings, inspections, observations and other sources will be reported to the Contractor to be addressed by the Contractor with its Personnel. Below is a non-exhaustive list of conduct that violates the Contractor Safety Standards of Conduct. This list is not intended to cover every possible type of safety and conduct violation, but identifies Amazon's perspective of the severity of incidents as divided into the following *four categories*:

CATEGORY I - Behaviors that create risk of ***serious injury or loss of life*** are regarded as extremely serious and include:

- Unauthorized use of any Amazon or 3rd party equipment
- Intentional misuse of equipment
- Bypassing or unauthorized removal of machine safeguarding safety devices: intentionally bypassing a safety device
- Failure to wear Personal Protective Equipment (PPE) for high risk operations (HROs): not wearing required PPE for high-risk task including working at heights, electrical work etc.
- Use of cell phone devices while performing HROs
- Unauthorized entry into Amazon robotic floor or robotics work cell
- Unauthorized permit to work (i.e. confined space, electrical, hot work, roof work)
- Failure to isolate and control hazardous energy: disregarding the Hazardous Energy Control (Lock out/Tag Out); i.e., failure to lock out/tag out equipment when required, or performing live electrical work without permit to work
- Not using a spotter when one is required for completing yard tasks
- Not following posted speed in yard or associate parking lots

CATEGORY II - Behaviors that create risk of ***significant injury*** to self or others include:

- Failure to wear required PPE-Class II High Visibility garments in the yard
- Unauthorized use of equipment, when not trained or authorized
- Unauthorized entry into a yard or facility roof
- Improper disposal of regulated waste; this can include willful mismanagement of lithium batteries, nicotine-containing products, and hazardous waste
- Willful violations of the "minimum safe distances" needed to be kept between the vehicle and pedestrians

CATEGORY III - Behaviors that create risk of or result in ***injuries*** to self or others include:

- Failure to remove individual energy isolation lock and tag according to the procedure
- Operating Powered Industrial Trucks (PIT) while not having physical possession of training records accessible (PIT License)
- Failure to complete pre-use inspection checklist for any other equipment requiring the same or similar documentation

CATEGORY IV - Behaviors and incidents that are less severe than Categories I, II, or III identified above include:

- Unsatisfactory work performance e.g. poor housekeeping
- Not wearing hearing protection in designated areas
- Not wearing interior-required PPE
- Blocking Life Safety emergency egress and equipment (AED, Fire Extinguisher, Eyewash)

5.0 Corrective Action Plan

Contractors shall review reported incidents involving their personnel and provide documented corrective action(s) to their personnel to address violations of the Contractor Safety Standards of Conduct and develop a Corrective Action Plan (CAP) to help prevent/mitigate future violations. The CAP shall be shared with the Amazon's Standards of Conduct CAP Committee. The Contractor shall retain records tracking the progress and completion of any affirmative remedial action proposed in a CAP and make those records available for review by the Committee on request. (*See Appendix A: Corrective Action Plan Form*)

The CAP must include the following:

- Incident Description/Summary
- Root Cause Analysis
- Hazard Control and Risk Assessment
- Corrective Action
- Personnel Training
- Communication Methods

5.1 Corrective Action Plan Process

The objective of every CAP is to address the original finding or recommendation that generated it. CAPs must be achievable, verifiable, assigned to a point of contact, and include a realistic target date for completion. On a case-by-case basis, CAPs involving multiple parties may be accepted e.g., subcontractors, however one point-of-contact will be assigned as the primary responsible party.

In general, the corrective action process is as follows:

1. An event occurs (such as an incident, hazard, audit, external audit, etc.)
2. A deficiency or needed improvements is revealed.
3. Contractor must perform a risk assessment.
4. Contractor will propose a CAP to mitigate the safety risk or condition and assign a post-implementation risk assessment.
5. Contractor will submit a CAP necessary to conform to Amazon's expectations for health and safety for review. (The Contract Owner and/or Amazon POCs may request revisions to the proposed corrective action).
6. Upon review, the Contractor works toward completion of the CAP.
7. The Contract Risk Management (CRM) Team will add the CAP to a Corrective Action Plan Log, which it will use to track, document and monitor the corrective action.
8. Contractors will notify (*e.g. bi-weekly or monthly*) the Contract Owner and/or Amazon POCs of the actions taken, and the steps necessary to implement the CAP.
9. Contractors will notify the Contract Owner and/or Amazon POCs when the CAP actions are complete in a report containing sufficient detail for Amazon to identify the dates the CAP actions occurred.
10. The Contract Owner and/or Amazon POCs is responsible for verifying completion of the CAP, including appropriate documentation and onsite verification, if necessary.
11. The CAP is considered "closed" only after it has been fully reviewed, accepted, verified and closed by the Contract Owner.

5.2 Corrective Action Plan Closure and Verification

Once the Contractor considers all work on a CAP complete (**See Appendix B**), the Contractor will notify the Contract Owner and/or Amazon POCs through the accepted process (Smartsheets). The Contract Owner and/or Amazon POCs will then verify closure of the CAP through the review of documentation and/or field verification. The Contract Owner and/or Amazon POCs may request visual verification, onsite record review, or interviews with the Contractor's personnel, whereby Amazon representatives will conduct a site visit to confirm completion. A site visit may be required in the event that documentation is considered sensitive or if a document cannot be transmitted electronically.

Upon verification of CAP completion, the Contract Owner will transmit a closure letter to the Contractor. (**See Appendix C**) The CAP will be considered "closed". The original finding or recommendation that generated the CAP will also be considered "closed" at this time. The CRM Team will update the Corrective Action Plan Log to indicate closure.

6.0 Reconciliation

A Mitigation Monitoring Plan (MMP) shall be developed to address a **Category I** violation or incident to ensure that the Contractor maintains a process to monitor the effectiveness of the mitigations. (**See Appendix A: Mitigation Monitoring Plan**)

It is the responsibility of the Contractor to establish robust control measures to mitigate the hazard. Contractor must provide the following information for review of the MMP, prior to reconciliation meeting:

1. A brief description of the mitigation that is being established, including a summary or reference to the relevant safety risk assessment, and including a timeline for the establishment of the mitigation.
2. A description of the protocol that will be used to monitor the effectiveness of the mitigation, including any forms or checklist, and references to any relevant software, equipment, skills or training.
3. Any training or communication effort necessary to monitor the mitigation and utilize the resulting information.
4. One or more safety performance indicators, to be accompanied by safety performance targets, that will be used to evaluate the effectiveness of mitigation in terms of controlling the intended safety risk.
5. Methods for collecting and analyzing data and information yielding by monitoring activities. This includes, where applicable, implementation plans if new systems must be developed to measure the mitigation.
6. A timeline for monitoring activities, culminating in the determination of next steps, based on what has been learned about the mitigation.

7.0 Contract Cancellation

Repeat violations of Amazon's health and safety policies demonstrates a failure to abide by Amazon's Contractor Safety Standards of Conduct and may result in the decision not to award further work and the termination of contracts with Amazon.

We need your help to ensure the safest possible work environment. Together we can learn, teach, and protect each other. We are counting on you to escalate concerns so we can address them together.

Thank you for your ownership and commitment to the Contractor Safety Standards of Conduct.

APPENDIX A: Corrective Action Plan/Mitigation Monitoring Form



Contractor's Corrective Action Plan/Mitigation Monitoring Plan For Contractor's Use

Instructions: Develop a plan (Corrective Action Plan or Mitigation Monitoring Plan) that describes the action the Contractor will take to minimize, control, correct, or eliminate hazards, and the schedule for implementing those actions.

Contractor Information		
Contractor Company Name:	Contractor Representative:	Contractor Representative Email Address:
Sub-Contractor Company Name:	Sub-Contractor Representative (if applicable):	Sub-Contractor Representative email:
Internal Company Information		
Contract Owner Name (Amazon POC):	Contract Owner (Amazon POC) Alias:	
Date of Incident/Event:	Time of Incident/Event:	
Site Code:	Incident/Event Type:	

Risk-Reduction Actions	
<p>Based on the root causes of gaps found in the Contractor's performance or safety programs, outline the activities that will be undertaken to reduce the risk of safety incidents and achieve our goal of an injury-free workplace. The plan may include steps that the Contractor has already implemented to address the identified gap.</p> <p>The following is a checklist of considerations to address actions to reduce risk. This plan is flexible and some items may not apply. Additional, unique risk reduction items may be added for a specific Contractor or work situation.</p> <p>Acceptable by Amazon: For each section, Amazon will determine if the action taken is Acceptable. (Yes, No, N/A).</p>	<p>Risk Reduction Action Steps: Be specific; define action steps as much as possible. Number each action step.</p> <p>Measurement Criteria: Clearly define how you will know each step has been implemented.</p> <p>Due Date: Date by which action item should be implemented. Leave blank if step will be ongoing for the duration of the plan.</p> <p>Person Responsible: Amazon or Contractor personnel.</p> <p>Status: Enter a status for each item; either In Progress, Complete, or Ongoing.</p>

Instructions: Use this form to document a Corrective Action Plan, which shall be established in accordance with the Contractor Safety Standards of Conduct. This form should be filled out by the Contractor's Point-of-Contact.

Contractor's Corrective Action Plan (CAP)				
Incident Description/Summary:		Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>		
<i>Provide a description/summary of the safety issue, finding of non-compliance or identified area of improvement that generated the CAP.</i>				
Root Cause Analysis:				
<i>Describe the real or underlying origin(s) of an event/incident, which allowed the immediate cause to develop. (Five Whys or other root cause analysis tool)</i>				
Hazard Control and Risk Assessment:		Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>		
<i>List specific hazard controls that will be utilized (e.g., work permitting, JSA, safety walks, etc.)</i>				
Risk Reduction Action Steps	Measurement Criteria	Due Date	Person Responsible	Status
1.				
2.				
3.				
Corrective Action:		Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>		
<i>Describe the corrective action to address the safety issue, finding of non-compliance or identified area of improvement.</i>				
Risk Reduction Action Steps	Measurement Criteria	Due Date	Person Responsible	Status
1.				
2.				
3.				
Training:		Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>		
<i>Describe the review/approval process to ensure contract personnel are trained and qualified workers for the work to be performed.</i>				
Risk Reduction Action Steps	Measurement Criteria	Due Date	Person Responsible	Status
1.				
2.				
3.				

Communication:		Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>		
<i>Describe how Contractor will share information to reduce risk (lessons learned, safety bulletins, etc.)</i>				
Risk Reduction Action Steps	Measurement Criteria	Due Date	Person Responsible	Status
1.				
2.				
3.				

Reviews and Approvals	
<i>Review and approval signatures are required below by the designated representatives. This form may be signed electronically (e.g. DocuSign, e-mail approvals, etc.).</i>	
WHS Representative Review Signature:	Date:
Contractor Representative:	Date:
Sub-Contractor Representative (if applicable):	Date:
Amazon Contract Owner:	Date:
Amazon Site Leader:	Date:



Instructions: Use this form to document a Mitigation Monitoring Plan, which shall be established in accordance with the Contractor Safety Standards of Conduct. This form should be filled out by the Contractor's Point-of-Contact.

Contractor's Mitigation Monitoring Plan (MMP)				
Incident Description/Summary:		Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>		
Provide a description/summary of the safety issue, finding of non-compliance or identified area of improvement that generated the MMP.				
Hazard Control and Risk Assessment:		Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>		
Describe the mitigation that is being established, including the risk assessment.				
Risk Reduction Action Steps	Measurement Criteria	Due Date	Person Responsible	Status
1.				
2.				
3.				
Procedures and Work Practices:		Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>		
List specific safety procedures and work practices that will be followed to reduce risk, including how compliance will be tracked (KPIs, etc.)				
Risk Reduction Action Steps	Measurement Criteria	Due Date	Person Responsible	Status
1.				
2.				
3.				
Training:		Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>		
Identify any training that will be necessary to carry out this MMP and to utilize the resulting information to determine the effectiveness of the mitigation.				
Risk Reduction Action Steps	Measurement Criteria	Due Date	Person Responsible	Status
1.				
2.				
3.				
Communication:		Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>		
Identify any communication that will be necessary to carry out this MMP and to utilize the resulting information to determine the effectiveness of the mitigation.				
Risk Reduction Action Steps	Measurement Criteria	Due Date	Person Responsible	Status
1.				
2.				
3.				

Management Commitment / Involvement (Contractor):					Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>				
<i>Describe how Contractor's management will be involved and committed to reducing risk. Be descriptive (e.g., policies, procedures, frequency of involvement, KPIs, etc.)</i>									
Risk Reduction Action Steps		Measurement Criteria		Due Date		Person Responsible		Status	
1.									
2.									
3.									
Resources									
Resource Requirements:					Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>				
<i>Describe the methods that will be used to collect and analyze the data and information yielded by monitoring activities. If new resources are required, include the steps necessary to put these resources in place.</i>									
Risk Reduction Action Steps		Measurement Criteria		Due Date		Person Responsible		Status	
1.									
2.									
3.									
Field Compliance									
Site Audits/Inspections:					Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>				
<i>Describe any requirements for audits/inspections, including action item closure process.</i>									
Risk Reduction Action Steps		Measurement Criteria		Due Date		Person Responsible		Status	
1.									
2.									
3.									
Safety Support on Site:					Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>				
<i>Describe the dedicated site safety support that will be in place to reduce risk. (e.g.: dedicated safety oversight, including sub-contractors)</i>									
Risk Reduction Action Steps		Measurement Criteria		Due Date		Person Responsible		Status	
1.									
2.									
3.									
Additional Systems (As Applicable):					Acceptable by Amazon? Yes: <input type="checkbox"/> No: <input type="checkbox"/> N/A: <input type="checkbox"/>				
<i>Describe any additional systems/processes that will be required.</i>									
Risk Reduction Action Steps		Measurement Criteria		Due Date		Person Responsible		Status	
1.									
2.									



Reviews and Approvals

Review and approval signatures are required below by the designated representatives. This form may be signed electronically (e.g. DocuSign, e-mail approvals, etc.).

WHS Representative Review Signature:	Date:
Contractor Representative:	Date:
Sub-Contractor Representative (if applicable):	Date:
Amazon Contract Owner:	Date:
Amazon Site Leader:	Date:

APPENDIX B: Corrective Action Plan Closure Checklist

For Contractor's: After the implementation of the (CAP), please submit a formal request to close the CAP.

CAP Request for Closure Letter- Please email to: globalcontractrisk@amazon.com and Contract Owner Point-of-Contact (POC).

Details to be included in Amazon Request for Closure Letter:

- CAP Incident Description/Summary
- CAP Mitigations
- Activity to meet objectives of the plan
- Scheduled Completion Date(s)
- CAP Supporting Documentation
 - Including Original CAP submission form

APPENDIX C: *Corrective Action Plan Closure Letter Request*

(Insert Company's Logo)

(Insert Date)

Name
Company
Title
Company's Address

Dear (Insert Contract Owner's POC Name):

This is (Insert Company's Name) request to close (Insert CAP description).

CAP Summary: (Insert CAP Summary)

CAP Mitigation: (Insert CAP Mitigation actions including activities to meet the objective)

The implementation date was (list date).

Attached with this letter is (list a summary of CAP documentation to support closure of the corrective action).

Feel free to contact (Insert Name) at (Insert Email) with any questions you may have.

Sincerely,

(Insert Name)
(Title)

cc: globalcontractrisk@amazon.com
(Insert Contract Owner's POC Email)