



By email to: zapolsky@amazon.com

December 14, 2020

Mr. David Zapolsky
Amazon.com Inc.
Senior Vice President, General Counsel and Corporate Secretary
410 Terry Avenue North
Seattle, Washington 98109

Dear Mr. Zapolsky:

The Unitarian Universalist Association, a shareowner of Amazon, is hereby submitting the enclosed resolution for consideration at the upcoming annual meeting. We are co-filing with the Sisters of St. Joseph of Brentwood, the lead filer of the proposal. The resolution requests that the Board of Directors commission an independent report assessing Amazon's process for customer due diligence, to determine whether customers' use of its products or services with surveillance or computer vision capabilities or cloud products contributes to human rights violations.

The Unitarian Universalist Association ("UUA") is a faith community of more than 1000 self-governing congregations that brings to the world a vision of religious freedom, tolerance and social justice. With roots in the Jewish and Christian traditions, Unitarianism and Universalism have been forces in American spirituality from the time of the first Pilgrim and Puritan settlers. The UUA is also an investor with an endowment valued at approximately \$200 million, the earnings from which are an important source of revenue supporting our work in the world. The UUA takes its responsibility as an investor and shareowner very seriously. We view the shareholder resolution process as an opportunity to bear witness to our values at the same time that we enhance the long-term value of our investments.

We submit the enclosed resolution for inclusion in the proxy statement in accordance with Rule 14a-8 of the General Rules and Regulations of the Securities and Exchange Act of 1934 for consideration and action by the shareowners at the upcoming annual meeting. We have held at least \$2,000 in market value of the company's common stock for more than one year as of the filing date and will continue to hold at least the requisite number of shares for filing proxy resolutions through the stockholders' meeting.

Verification that we are beneficial owners of the requisite shares of Amazon will be provided on request. We defer to the Sisters of St. Joseph of Brentwood regarding all decisions on this proposal. You may contact me at (617) 620-0574 or tbrennan@uua.org.

Very truly yours,



Timothy Brennan,
Special Advisor on Responsible Investing

Cc: Andrew McGeorge, UUA Treasurer & CFO
Mary Beth Gallagher, Investor Advocates for Social Justice

Enclosure: Shareholder resolution



Resolved, Shareholders request the Board of Directors commission an independent third-party report, at reasonable cost and omitting proprietary information, assessing Amazon’s process for customer due diligence, to determine whether customers’ use of its products or services with surveillance or computer vision capabilities or cloud products contributes to human rights violations.

Whereas, Amazon’s surveillance and cloud products may exacerbate systemic inequities, compromise public oversight, and contribute to mass surveillance. Amazon Web Services (AWS), the top cloud provider with 2019 revenue of \$35 billion, serves all U.S. intelligence agencies, and international governments.

In 2019, the UN Special Rapporteur on freedom of opinion and expression recommended “an immediate moratorium on the global sale and transfer of private surveillance technology until rigorous human rights safeguards are put in place.”¹

“Know Your Customer” due diligence mitigates clients’ risks and human rights impacts,² and informs decisions around which business to pursue or avoid. It can reveal whether “the technologies provided by the company will be used to facilitate governmental human or civil rights or civil liberties violations.”³ In 2020, the Department of State offered due diligence guidance for companies on foreign sales of “products or services that have surveillance capabilities,” including to consider if “the end-user will likely misuse the product or service to carry out human rights violations.”⁴

Inadequate due diligence around surveillance and cloud products presents material privacy and data security risks. Negative perceptions about Amazon’s ties to U.S. government surveillance may impact competitiveness with other governments.

Amazon’s surveillance technologies perpetuate human rights impacts, including systemic racism, even if used according to Amazon’s guidelines:

- Amazon’s work with U.S. Immigration and Customs Enforcement (ICE) and Palantir drew employee and customer protests over ICE’s human rights abuses.
- Ring’s 1,600 police partnerships threaten civil rights and civil liberties, and may threaten sales.⁵ Police disproportionately seek surveillance footage from Black and brown communities.⁶ Lawmakers have requested information on police partnerships.⁷ Civil

¹ <https://www.ohchr.org/EN/Issues/FreedomOpinion/Pages/SR2019ReporttoHRC.aspx>

²

https://www.humanrights.dk/sites/humanrights.dk/files/media/document/Phase%20-%20Impact%20prevent%20ion%20C%20mitigation%20and%20remediation_n.pdf

³ <https://www.eff.org/deeplinks/2018/07/should-your-company-help-ice-know-your-customer-standards-evaluating-domestic>

⁴ <https://www.state.gov/key-topics-bureau-of-democracy-human-rights-and-labor/due-diligence-guidance/>

⁵ <https://gizmodo.com/dont-buy-anyone-a-ring-camera-1840070640>

⁶ <https://gizmodo.com/a-new-buy-black-campaign-aims-to-avert-an-amazon-survei-1845740166>

⁷ <https://oversight.house.gov/sites/democrats.oversight.house.gov/files/2020-02-19.RK%20to%20Huseman-Amaon%20re%20Ring%20%281%29.pdf>

rights groups asked Congress to investigate Amazon's "surveillance empire."⁸ Senator Markey's 2019 Ring investigation found "no oversight/compliance mechanisms" protecting privacy.⁹

- Despite content moderation, racist speech is rampant on Ring's Neighbors application,¹⁰ and users disproportionately labeled people of color as "suspicious."¹¹
- After police murdered George Floyd, Amazon announced a yearlong moratorium on Rekognition sales to police. While it is unclear how this impacted existing customers, Amazon facilitated increased police surveillance: Ring established 280 new police partnerships following Floyd's killing.¹² In 2020, Amazon reported increased police requests for customer data.¹³
- Amazon lacks systems to effectively monitor customer use of its technologies. AWS's top executive said: "I don't think we know the total number of police departments that are using facial recognition technology."¹⁴ Jackson, Mississippi police used Ring footage for real-time surveillance without Amazon's involvement.¹⁵

Despite potential misuse and lack of effective oversight, Amazon continues releasing surveillance products (home drone, vein scanner) with civil liberties concerns.

⁸ <https://thehill.com/policy/technology/471903-civil-rights-groups-press-for-congressional-investigation-into-amazons>

⁹ <https://www.markey.senate.gov/news/press-releases/senator-markey-investigation-into-amazon-ring-doorbell-reveals-egregiously-lax-privacy-policies-and-civil-rights-protections>

¹⁰ https://www.vice.com/en_us/article/qyvyzd/amazons-home-security-company-is-turning-everyone-into-cops

¹¹ <https://media-alliance.org/2020/11/ringing-alarm-bells/>

¹² <https://mediajustice.org/news/mediajustice-finds-280-new-amazon-police-partnerships-since-george-floyd-killing-launches-campaign-for-black-brown-and-allied-holiday-shoppers-to-sever-ties-with-online-giant/>

¹³ <https://www.documentcloud.org/documents/7010600-Amazon-Information-Request-Report-June-2020.html>

¹⁴ <https://www.youtube.com/watch?v=RvVfjVj5z8s&t=5007s>

¹⁵ <https://www.bbc.com/news/technology-54809228>