



By email to: [zapolsky@amazon.com](mailto:zapolsky@amazon.com), [markhoff@amazon.com](mailto:markhoff@amazon.com)

December 15, 2021

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 long-time shareowner of Amazon.com Inc. (the “Company”), is hereby submitting the attached proposal (the “Proposal”) pursuant to the Securities and Exchange Commission’s Rule 14a-8 to be included in the proxy statement of the Company for its 2022 annual meeting of shareholders. 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 customer due diligence process to determine whether customers’ use of its products and services with surveillance, computer vision, or cloud storage capabilities 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 \$267 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.

The UUA through its Unitarian Universalist Common Endowment Fund has continuously beneficially owned, for at least three years as of the date hereof, at least \$2,000 worth of the Company’s common stock. Verification of this ownership will be sent under separate cover. The UUA intends to continue to

hold such shares through the date of the Company's 2022 annual meeting of shareholders.

The UUA defers to the Investor Advocates for Social Justice representing the lead filer in all decision-making regarding this proposal. Please contact Gina Falada at (973) 509-8800 or [gfalada@iasj.org](mailto:gfalada@iasj.org) with any questions or to arrange for a meeting. If need be, I can be reached directly at (617) 620-0574 or [tbrennan@uua.org](mailto:tbrennan@uua.org).

Very truly yours,



Timothy Brennan  
Special Advisor on Responsible Investing

cc: Andrew McGeorge, Treasurer & CFO, UUA  
Mark Hoffman, VP and AGC, Amazon  
Sr. Pat Mahoney, Sisters of St. Joseph of Brentwood  
Gina Falada, 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.”<sup>1</sup>

“Know Your Customer” due diligence mitigates clients’ risks and human rights impacts,<sup>2</sup> 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.”<sup>3</sup> 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.”<sup>4</sup>

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.<sup>5</sup> Police disproportionately seek surveillance footage from Black and brown communities.<sup>6</sup> Lawmakers have requested information on police partnerships.<sup>7</sup> Civil

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

<sup>2</sup>

[https://www.humanrights.dk/sites/humanrights.dk/files/media/document/Phase%20-%20Impact%20prevent%20ion%20C%20mitigation%20and%20remediation\\_n.pdf](https://www.humanrights.dk/sites/humanrights.dk/files/media/document/Phase%20-%20Impact%20prevent%20ion%20C%20mitigation%20and%20remediation_n.pdf)

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

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

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

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

<sup>7</sup> <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."<sup>8</sup> Senator Markey's 2019 Ring investigation found "no oversight/compliance mechanisms" protecting privacy.<sup>9</sup>

- Despite content moderation, racist speech is rampant on Ring's Neighbors application,<sup>10</sup> and users disproportionately labeled people of color as "suspicious."<sup>11</sup>
- 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.<sup>12</sup> In 2020, Amazon reported increased police requests for customer data.<sup>13</sup>
- 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."<sup>14</sup> Jackson, Mississippi police used Ring footage for real-time surveillance without Amazon's involvement.<sup>15</sup>

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

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

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

<sup>10</sup> [https://www.vice.com/en\\_us/article/qyvyzd/amazons-home-security-company-is-turning-everyone-into-cops](https://www.vice.com/en_us/article/qyvyzd/amazons-home-security-company-is-turning-everyone-into-cops)

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

<sup>12</sup> <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/>

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

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

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