

AMAZON IN SAUDI ARABIA

WHY MIGRANT WORKERS REMAIN AT RISK OF EXPLOITATION

AMNESTY INTERNATIONAL

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First published in 2026
by Amnesty International Ltd
Peter Benenson House, 1 Easton Street
London WC1X 0DW, UK

Index: MDE 23/1544/2026
Original language: English

amnesty.org

Cover illustration: *The illustration symbolizes the contrast between the promise of opportunity and the reality experienced by many migrant workers in Amazon warehouses in Saudi Arabia. The worker's reflection, holding a labour-supplier contract, represents the precarious position of workers employed through third-party labour providers and the continuing structural risks linked to outsourcing arrangements and the kafala system, despite some improvements reported by workers following actions taken by Amazon. © Amnesty International*

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1. INTRODUCTION

In late 2023, Amnesty International documented serious human rights abuses suffered by Nepali migrant workers employed by labour supply companies and contracted to work in Amazon's warehouses in Saudi Arabia. Many of the workers interviewed for that research were highly likely to have been victims of human trafficking. The report found that despite operating in a context widely recognized as posing heightened risks of labour exploitation, Amazon failed to take sufficient action to prevent abuses in its contracted workforce and/or to provide effective and timely remedy when harm occurred. More broadly, the research highlighted the human rights risks created by the kafala system, which must be addressed by any company operating in Saudi Arabia.[1][2]

Amazon publicly committed to improving conditions for its contracted workforce in October 2023,[3] and subsequently took a number of steps that it said were aimed at strengthening oversight of its suppliers, enhancing accommodation standards, and expanding access to grievance mechanisms. By February 2024, the company also reported having paid USD 1.9 million to reimburse unlawful recruitment fees paid by more than 700 workers contracted to its operations in Saudi Arabia.[4] By July 2025, this had increased to USD 2.2 million provided to nearly 850 workers,[5] and, at the time of writing, to more than USD 2.45 million for 1,180 contracted workers.[6] These actions and commitments are a welcome recognition of the need for reforms to address abuses.

At the same time, continued documentation of workers' experiences remains essential to assessing the extent to which these actions and commitments have resulted in meaningful change in practice, as workers are best placed to evaluate their impact.

Between September 2025 and March 2026, Amnesty International interviewed 24 migrant workers from India and Nepal who at the time of the interview were or had recently been employed by three labour supply companies to work in an Amazon warehouse in Riyadh. None of these labour suppliers featured in the 2023 research. The purpose of the new research was to assess the impact of Amazon's actions and commitments on the experiences of contracted workers, and the extent to which the abuses Amnesty International had previously documented had ceased or continued.

Workers' testimony indicates some improvements to their conditions since Amnesty International's previous investigation, and Amazon has introduced a range of initiatives and used its leverage with its third-party labour suppliers in ways that appear to have contributed to these, particularly in relation to recruitment fee reimbursement and accommodation standards. Nonetheless, key underlying conditions that heighten migrant workers' vulnerability to abuse in Saudi Arabia have not been effectively mitigated, and management practices within Amazon's own warehouses continue to subject them to intense pressure and heightened insecurity.

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[1] Amnesty International, *"Don't worry it's a branch of Amazon": Exploitation of migrant workers contracted to Amazon in Saudi Arabia* (Index: MDE 23/7229/2023), 10 October 2023, https://www.amnesty.org/en/documents/mde23/7229/2023/en/

[2] Reporting by The Guardian and media partners also documented labour abuses affecting workers contracted to Amazon's operations in Saudi Arabia. See: The Guardian, "Revealed: Amazon linked to trafficking of workers in Saudi Arabia", 10 October 2023, https://www.theguardian.com/technology/2023/oct/10/amazon-trafficking-links-claims-saudi-arabia-workers-abuses

[3] Amazon, "Amazon's response to Amnesty International's report", 10 October 2023, https://www.aboutamazon.com/news/sustainability/amazon-response-to-amnesty-international

[4] Amazon, "Update on Amazon's response to violations of our supply chain standards involving contracted workers in the Kingdom of Saudi Arabia", 22 February 2024, https://www.aboutamazon.com/news/company-news/update-on-amazons-response-to-violations-of-our-supply-chain-standards-involving-contracted-workers-in-the-kingdom-of-saudi-arabia

[5] Amazon, *Modern Slavery Statement 2025*, 28 July 2025, https://sustainability.aboutamazon.com/modern-slavery-statement.pdf, p. 14.

[6] Amazon, *Response to Amnesty International*, 13 October 2026 (see Annex 2).

Most notably, Amnesty International's findings suggest that the measures introduced by Amazon have not addressed the underlying risks associated with its continuous reliance on third-party labour supply companies to meet its workforce requirements.

Within Saudi Arabia's kafala system, this outsourced operating model means contracted migrant workers continue to be left exposed to significant human rights harms stemming from their ongoing dependence on these companies, who not only employ them but also effectively control their immigration status. The recurrence of abuses documented by Amnesty International in both 2023 and 2026 underscores the need for Amazon to move away from this reliance and progressively increase the direct employment of workers performing core functions within its operations.

2. METHODOLOGY

The findings presented in this briefing are based primarily on interviews conducted by Amnesty International between September 2025 and March 2026 with 24 migrant workers from India and Nepal contracted through three labour supply companies and deployed to work in an Amazon fulfilment centre in Riyadh.

Amnesty International also sought information from Amazon regarding the steps it had taken since 2023 to address the risk of being involved in human rights abuses and to remediate harms suffered by migrant workers. The organization wrote to Amazon on 12 June 2026 and subsequently provided the company with an opportunity to respond to the findings in full in a further letter sent on 28 September 2026.[7] On 6 July 2026, Amazon provided an "interim response" to Amnesty International's preliminary findings and questions. On 13 October 2026, it shared a response to Amnesty International's second letter. Both responses are reflected where relevant throughout this briefing and are available in full in the Annexes 1 and 2. Amnesty International also shared the preliminary findings of its research with the Saudi authorities in a letter dated 28 September. At the time of writing, the government had not provided a response.

All interviewees for this briefing were employed through one of three labour supply companies, none of which featured in the 2023 research. Amnesty International did not interview workers directly employed by Amazon. During the course of this research, Amnesty International received information suggesting that several other labour supply companies also provide contracted workers to Amazon's operations in Saudi Arabia. However, due to resource limitations, the interview sample focused on three suppliers.[8]

While the workers interviewed for this briefing were employed through different labour supply companies from those examined in the 2023 research, they were contracted to work in the same Amazon operations in Saudi Arabia. Their experiences therefore provide an indication of how commitments that Amazon stated were being implemented across its Saudi operations have affected contracted workers in practice, while also highlighting ongoing risks associated with Amazon's continuing reliance on outsourced labour. Interviewees had spent substantial periods living and working in Saudi Arabia, in most cases for at least a year, and others for as long as three years. As is explained throughout the briefing, they spoke not only of their own experiences, but also conditions observed among co-workers, with whom they also lived in large, shared accommodation.

Due to significant security challenges in conducting human rights research in Saudi Arabia, opportunities to identify and interview migrant workers currently living and working in the country are limited. Research is further constrained by workers' fear of speaking to human rights organizations, including Amnesty International, due to the potential repercussions of doing so. These constraints mean that Amnesty International's interview sample is not statistically representative of all contracted workers across Amazon's operations. The research is therefore intended to document workers' experiences and identify patterns in their accounts, rather than measure the prevalence of particular conditions across Amazon's contracted workforce as a whole.

Nevertheless, the interviews provide important evidence of contracted workers' experiences and offer insight into whether changes introduced by Amazon are being reflected as such.

To protect the individuals quoted in the briefing from reprisals, Amnesty International has changed their names.

[7] Letters on file with Amnesty International.
[8] Amazon later informed Amnesty International that it works with "fewer than 10" licensed third-party vendors in Saudi Arabia. See, Amazon, *Response to Amnesty International*, 13 October 2026 (Annex 2).

3. KEY FINDINGS

3.1 RECRUITMENT PRACTICES: REDUCED FEE-CHARGING, BUT DECEPTIVE RECRUITMENT AND GAPS IN REIMBURSEMENT

In a step towards remediation of a prominent issue documented in Amnesty International's 2023 research, Amazon told Amnesty International in October 2026 that, over the past three years, it had reimbursed more than USD 2.45 million in recruitment fees to 1,180 workers in its Saudi Arabia operations, an average of over USD 2,000 per person.[9] It previously stated that this included workers who had already left the country, and that although its third-party suppliers are required to bear recruitment costs, in this instance it provided the reimbursement itself, to expedite payments.[10][11]

International labour standards prohibit workers from being "charged directly or indirectly, in whole or in part, any fees or costs for their recruitment",[12] and Saudi Arabia's Labour Law stipulates that employers should cover the costs of recruitment and obtaining a worker's residence permit.[13] Recruitment fees are a driver of debt bondage, which is an indicator of forced labour,[14] making zero-cost recruitment an important safeguard against exploitation. Against this backdrop, Amazon's reported reimbursement is a significant remedial measure. Where workers have already paid such fees, reimbursement is a key part of remedy, helping to alleviate debt burdens that can leave workers vulnerable to further exploitation and other forced labour-related abuses while also addressing some of the financial harm suffered by workers and their families.

RECRUITMENT FEES AND RELATED COSTS

"Any fees or costs incurred in the recruitment process in order for workers to secure employment or placement, regardless of the manner, timing or location of their imposition or collection."

ILO's Definition of Recruitment Fees and Related Costs[15]

One Nepali man who had previously been interviewed for Amnesty International's 2023 report explained the immense impact of being reimbursed several thousand US dollars by Amazon for his recruitment fees, travel costs and debt incurred through the high-interest loan he had taken out to migrate:

[9] Amazon, *Response to Amnesty International*, 13 October 2026 (see Annex 2).
[10] Amazon, *Modern Slavery Statement 2025*, (previously cited), p. 14.
[11] As of the end of 2024, the International Consortium of Investigative Journalists (ICIJ), which had also previously reported on conditions for contracted workers in Amazon in Saudi Arabia, reported that it had documented at least 33 current and former workers who had not at that time been reimbursed their fees. Amnesty International does not know the current status of these reimbursements. See ICIJ, "Amazon workers in Saudi Arabia say company has failed to compensate many for labor abuses", 20 December 2024, https://www.icij.org/investigations/trafficking-inc/amazon-workers-in-saudi-arabia-say-company-has-failed-to-compensate-many-for-labor-abuses/
[12] ILO General Principles and Operational Guidelines for Fair Recruitment; ILO's Definition of Recruitment Fees and Related Costs, which is to be read in conjunction with the ILO General Principles.
[13] Article 40 of Saudi Arabia's Labour Law.
[14] ILO, *Recruitment fees and related costs at a glance*, 2024, https://www.ilo.org/publications/recruitment-fees-and-related-costs-glance
[15] To be read in conjunction with the ILO General Principles and Operational Guidelines for Fair Recruitment (previously cited).

"When I got the money back, the interest on my loan was piling up. So, that reimbursement was a big relief at that moment. With that money, I cleared most of the loans I had… I also spent it on my grandfather and grandmother's hospital care. My grandfather had undergone hernia surgery, and we paid the medical bills with that money. My grandmother was also paralysed on the left side of her body, so she had to go through intensive medications, which was costly too. We paid her hospital bills with that money… Until I got that money, we were unable to provide proper medical care for them. So, it helped us a lot."[16]

Compared with Amnesty International's 2023 findings, fewer of the workers interviewed for this briefing reported paying recruitment fees to agents to secure their jobs, and those who did generally reported lower average payments.[17] This appears consistent with efforts Amazon says it has taken since 2023 to connect its third-party suppliers with recruitment agents operating on the principle that employers pay for workers' recruitment-related costs.[18]

However, worker-paid recruitment costs had not been eliminated. Some interviewees who had been recruited in 2024 still reported paying fees to recruitment agents or brokers in their home countries. Many others – including a few recruited as recently as 2025 – continued to incur other recruitment-related costs, such as expenses for medical examinations, travel, labour permits, and other required documentation, all in breach of international standards.[19]

Importantly, of those who reported paying recruitment fees and related costs, nearly all said that they were later reimbursed, either in part or in full, by their labour supply company or Amazon after arriving in Saudi Arabia. Nonetheless, these reimbursements did not always reflect the amounts workers had actually paid. A few workers told Amnesty International that they were too scared to disclose the full extent of the payments they made, even when asked, while a couple of others said they were unable to obtain reimbursement because they lacked proof of payment.

Such cases highlight the challenges and complexity of accurately assessing and remediating recruitment-related costs. In many recruitment corridors, migrant workers must navigate multiple intermediaries to secure employment abroad, often making prohibited payments that are recorded informally and made without receipts or other documentation. Recruiters and agents frequently instruct workers not to disclose such payments, instilling fear and discouraging them from reporting the full amounts they have paid, even when reimbursement opportunities arise.[20] As a result, workers can face significant difficulties in substantiating their recruitment-related costs and obtaining reimbursement that fully corresponds to the amounts they paid. These challenges underscore both the persistence of recruitment fee abuses and the practical difficulties of ensuring that remediation programmes fully address the harm suffered by workers.

Masood, who arrived in Saudi Arabia in late 2024, explained:

"Even after coming to Saudi Arabia, I couldn't reveal that I paid that much money to get a job. When I came here, my supply company asked, 'Did you pay fees to come here?' I couldn't tell the truth because, in India, the people at the manpower agency told me not to tell anyone. Because of that, I feared telling the truth. I thought at that time, 'What if I would be kicked out from the job and have to return home? I have paid a lot of money, and it would create a problem for me if they sent me to India without allowing me to work.' So, I didn't tell anyone."

In its interim response to Amnesty International, Amazon said that it has maintained a zero worker-paid recruitment fee policy since 2018 and introduced additional standards in 2024 to strengthen and standardize the reimbursement of recruitment-related costs. The company said suppliers are responsible for reimbursing workers, although Amazon has in some cases provided reimbursement directly. Amazon also stated that workers do not need documentary proof of payments and that suppliers are expected to investigate claims using worker testimony and other available evidence. Amazon said that it monitors suppliers' compliance with its recruitment and worker protection standards through audits, worker interviews and grievance mechanisms,[21] but did not respond to Amnesty International's request for data on the number and frequency of such audits, or the number and type of breaches identified.[22] The company said that it

[16] Interview conducted remotely, 25 September 2026.
[17] Amnesty International's interview findings do not allow broader conclusions to be drawn about whether such phenomenon has in fact lessened across Amazon's operations, as the sample is not representative and the underlying population is particularly difficult to access.
[18] Amazon, *Response to Amnesty International*, 13 October 2026 (see Annex 2). See also, Amazon, *Modern Slavery Statement 2025* (previously cited), p. 14.
[19] See ILO General Principles and Operational Guidelines for Fair Recruitment; ILO's Definition of Recruitment Fees and Related Costs, which is to be read in conjunction with the ILO General Principles, https://www.ilo.org/sites/default/files/wcmsp5/groups/public/@ed_protect/@protrav/@migrant/documents/publication/wcms_703485.pdf
[20] Amnesty International, Nepal: Turning people into profits: Abusive recruitment, trafficking and forced labour of Nepali migrant workers (Index: ASA 31/6206/2017), 6 June 2017, https://www.amnesty.org/en/documents/asa31/6206/2017/en/, pp. 22-26.
[21] Amazon, *Interim Response to Amnesty International*, 6 July 2026 (see Annex 1).
[22] Amnesty International, Letter to Amazon, 28 September 2026, on file with Amnesty International.

requires corrective action where non-conformances are identified and may terminate vendor relationships, ensuring responsible disengagement to support affected workers. It added that it has previously terminated "multiple" such relationships following sustained engagement with vendors that failed to meet its standards.[23] It highlighted its provision of guidance and training on responsible recruitment to suppliers, including on communicating clearly to workers about the nature of their employment, and says it has sought to connect suppliers with recruitment agencies following the Employer Pays model, with 1,500 workers recruited through such channels to date.[24] The company also outlined initiatives it has undertaken to promote responsible recruitment and worker awareness in countries of origin, including Nepal.[25]

Nonetheless, deceptive recruitment practices remained a recurring concern for workers interviewed for this briefing. Similar to Amnesty International's previous findings, many of the contracted workers said they had been misled about the nature of their employment and the security of their job. Recruitment agents frequently told workers they would be employed directly by Amazon, only for them to discover, often shortly before departure, that they had in fact been recruited through third-party labour suppliers. Several said they would not have agreed to migrate had they known this from the outset. This reflects a broader concern, documented in research by Amnesty International and others across Saudi Arabia and the wider Gulf region, that workers often perceive employment through labour supply companies as less secure and carrying greater risks than direct employment.[26]

Kumar, for example, who was recruited from Nepal by one of Amazon's suppliers, explained to Amnesty International:

"The manpower agency told us that we would be hired at Amazon directly. They didn't tell us we would be contracted through [the supply co.]. Throughout the recruitment process, we didn't even hear the name of [the supply co.] … Had I known it was a contract job through [the supply co.], I wouldn't have come. Not only me, but nobody would have come."[27]

3.2 AMAZON'S CONTRACTED WORKERS REMAIN TRAPPED BY KAFALA

Nearly five years after Saudi Arabia's Labour Reform Initiative (LRI) entered into force, and three years after Amnesty International's first report into Amazon's warehouses in Saudi Arabia, this latest research demonstrates that many of Amazon's contracted workers remain trapped by Saudi Arabia's kafala sponsorship system in practice, with workers describing how they or their colleagues still faced significant barriers to changing employer, leaving the country, returning home during emergencies and escaping situations of exploitation.

In 2021, Saudi Arabia introduced reforms that created limited pathways for some migrant workers covered by the Labour Law to change employer and obtain exit visas without the permission of their sponsor (usually their employer). Workers may now transfer employers in certain circumstances, including after completing one year of employment and a few other situations,[28] and can also apply online for exit visas to travel home.

However, these reforms have not effectively dismantled the kafala system and workers remain heavily dependent on their employers in both law and practice. While workers can now submit requests to change employer or obtain exit permits through government platforms, employers continue to be notified of such requests and retain the ability to intervene in the process. In the case of exit permits, employers can lodge

[23] Amazon, *Response to Amnesty International*, 13 October 2026 (see Annex 2).
[24] Amazon, *Response to Amnesty International*, 13 October 2026 (see Annex 2).
[25] Amazon, *Interim Response to Amnesty International*, 6 July 2026 (see Annex 1).
[26] For discussion of the use of outsourcing amongst companies in Saudi Arabia, and the risks to workers, see ILO, White Paper, *Exploratory study of good policies in the protection of construction workers in the Middle East*, 20 February 2018, https://www.ilo.org/publications/exploratory-study-good-policies-protection-constructionworkers-middle-east. Also see, for example, Human Rights Watch, *'Die First, and I'll Pay You Later': Saudi Arabia's 'Giga-Projects' Built on Widespread Labor Abuses*, 4 December 2024, https://www.hrw.org/report/2024/12/04/die-first-and-ill-pay-you-later/saudi-arabias-giga-projects-builtwidespread-labor-abuses; and Business and Human Rights Centre (BHRC), *"We were treated as if we were machines" Migrant workers powering Saudi Arabia's energy transition*, 6 October 2025, https://media.businesshumanrights.org/media/documents/2025_Gulf_RE_report.pdf
[27] Interview conducted remotely on 26 September 2025.
[28] These include, for instance, cases where a worker's work permit has not been issued within 90 days of entering Saudi Arabia or has not been renewed, or if the worker has not been paid for three consecutive months. For more details, see MHRSD, Guide for the Services Offered by the Contractual Relationship Improvement Initiative (User Guide), 2021, pp. 5-6, copy on file with Amnesty International. Also, the Labour Law, which is applicable to all nationals and most foreign workers, stipulates that all workers can leave their job without serving their notice in various circumstances, including "if the employer fails to fulfil his essential contractual or statutory obligations towards the worker". However, other regulations applicable to foreign workers, including the Labour Reform Initiative, continue to restrict migrant workers' ability to change jobs without their employer's permission.

an inquiry within 10 days, before the government decides whether to approve or reject the worker's request.[29] The criteria authorities use to determine whether transfers or departures are approved remain unclear and the government has repeatedly failed to respond to Amnesty International's requests for clarification.[30] Indeed, human rights organizations have documented how employers continue to weaponize the kafala system against workers trying to change jobs, including by unilaterally issuing exit permits that force workers to leave the country rather than transfer to new employment,[31] illustrating the extent to which workers remain dependent on employers in practice.[32]

In January 2025, Saudi Arabia also updated its visa rules to require migrant workers' residence permits to have at least 30 days' validity remaining before a final exit visa can be issued. Where less than 30 days remain, the residence permit must first be renewed before the worker can leave the country permanently.[33] This creates an additional point of dependence on employers, who are generally responsible for renewing residence permits, and may create further obstacles for workers whose employers are unwilling to cooperate.

Amnesty International's latest interviews add to mounting evidence that while legal reforms may have expanded workers' rights on paper, they have still not translated into meaningful changes in workers' understanding of the system or day-to-day experiences. Like those interviewed for Amnesty International's 2023 research, most workers interviewed for this briefing still believed they could neither transfer to another employer without permission nor leave the country independently of their sponsor in any circumstances, and few were aware of anyone who had successfully done so. According to interviews conducted by Amnesty International, all three of Amazon's third-party labour supply companies covered in this briefing reinforced these perceptions rather than corrected them.

These findings are particularly significant given Amazon continues to recruit large numbers of workers through such third-party labour suppliers, rather than employing them directly. The experiences of contracted workers interviewed for this follow-up research suggest that Amazon's suppliers continue to exercise significant control over key decisions affecting their employment, job mobility and freedom of movement. As a result, many of the harms documented in this briefing stem not only from individual instances of supplier misconduct, but from Amazon's continued reliance on a labour model that leaves migrant workers exposed to the enduring effects of the kafala system.

Although many of the workers interviewed had never attempted to transfer employers themselves – some because they did not know it was even possible – virtually all those interviewed said they knew of no colleague who had successfully done so. For many, the only route they believed existed was to return home and seek new employment from abroad – something which would likely incur significant time and money. A few workers who had tried to move employers said their labour supply companies would not permit it.

For example, Avi, an Indian man who was employed by a labour supply company and working as a "picker" in Amazon's warehouse, told Amnesty International:

"When our two years of work were over at Amazon, we inquired with [the supply co.] if they would give us a transfer. But they denied. We asked, 'Do you allow us to change employer?' They clearly said, 'No, if you don't want to work, you can go to India.'"[34]

Bimal, from Nepal, explained: "I'm not aware of anyone who tried to change jobs and was successful. If a worker wants to change employer, he should return home and go for another company from home."[35]

The consequences of this dependence become particularly clear when workers lose their placement at Amazon. While Amazon may no longer require their labour, workers remain tied to the labour supplier that sponsored their visa. As the next section shows, this can leave workers in profoundly insecure situations when their assignment at Amazon comes to an end.

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[29] MHRSD, User Guide, 2021 (previously cited), p. 16.
[30] Letters from Amnesty International to Saudi Arabia's Ministry of Human Resources and Social Development, dated 30 August 2023 (Reference: TG MDE 23/2023.4447); and 20 January 2025 (Reference: TG MDE 23/2025.6440); and 11 March 2025 (Reference: TG MDE 23/2025.6565). On file with Amnesty International.
[31] See, MRRORS, "Saudi's Labour Reform Initiative: An Overview", 3 November 2024, https://www.migrant-rights.org/2024/11/saudislabour-reform-initiative-an-overview/; and Human Rights Watch, *'Die First, and I'll Pay You Later: Saudi Arabia's 'Giga-Projects' Built on Widespread Labor Abuses*, 4 December 2024, https://www.hrw.org/report/2024/12/04/die-first-and-ill-pay-you-later/saudi-arabias-giga-projects-builtwidespread-labor-abuses
[32] For more details of the kafala system and recent reforms, see pp. 31-35 of Amnesty International, *Saudi Arabia: "Nobody wants to work in these situations": A decade of exploitation on the Riyadh Metro project*, MDE 23/0241/2025, 18 November 2025, https://www.amnesty.org/en/documents/MDE23/0241/2025/en/; and, pp. 15-19 of Amnesty International, *"Don't worry it's a branch of Amazon"* (previously cited).
[33] Saudi Press Agency, "Passports General Directorate: Minimum of 30 Days Required for Resident's ID Validity", 9 January 2025, https://www.spa.gov.sa/en/N2240177
[34] Interview conducted remotely on 6 December 2025.
[35] Interview conducted remotely on 9 September 2025.

3.2.1 JOB INSECURITY

Almost all workers interviewed said they had been recruited on two-year contracts by labour supply companies to work at Amazon's facilities. Some interviewees had personally experienced being removed from Amazon's operations before their contracts with their labour supply company ended, while many others described a persistent fear that Amazon would end their engagement at its facilities – a process that workers regarded as being "fired" or "terminated" from Amazon – at any time, including for alleged productivity or performance concerns. Several said workers were often not given clear reasons for such decisions or a meaningful opportunity to challenge them.[36]

For example, Sanjay, from India, told Amnesty International that despite regularly exceeding all his targets and being awarded for this, he was fired from Amazon in late 2025 alongside four colleagues after he twice mistakenly put incorrect items in a storage bin. He was then accused of a "behaviour issue" that he said was never explained to him and which he had no meaningful opportunity to challenge – when he tried to explain himself to Amazon's human resources team at the warehouse, he said he was not listened to.[37]

Another worker, Ravi, said he worked in Amazon's warehouse for around a year before being removed from the facility after taking leave following the death of a close relative. "I had informed the supervisor of [the supply co.] about the situation back home and that I couldn't attend work", he explained, saying that despite the supervisor granting permission, he returned to work after four days only to find that he had been fired by Amazon.[38]

Such experiences contributed to a broader sense of insecurity among many of those interviewed, including workers who had not themselves been removed from Amazon's operations. Prakash, from Nepal, who had been working at Amazon for around 18 months, summed this up: "They can expel us from work anytime they want. It's unclear when they will kick us out from work – today or tomorrow. We're temporary workers!"[39]

Rohan also lived in the same fear:

"If workers don't meet the targets repeatedly, they get warnings. They can also be terminated. It is really hard to figure out why Amazon fires workers. Workers don't know what happened when and how Amazon fires them. There is no guarantee. After all, we are temporary workers. Amazon can end our job anytime it wants. There is no job security. Because of this, I always fear losing my job. I came here to work. What if they end my contract and I have to return home? Amazon keeps hiring and firing workers."[40]

Once removed from Amazon's operations, workers became dependent on their labour supplier to determine what happened next, whether that was securing another job placement with a different client, facilitating a transfer to another employer, arranging their return home, or simply leaving them without any work. Many workers told Amnesty International that they only fully understood the extent of this insecurity after arriving in Saudi Arabia. Several described living with a constant fear of losing their Amazon placement because they knew that, if that happened, their future would largely be in the hands of the labour supplier sponsoring them.

All of those interviewed for Amnesty International's 2023 research described experiencing unpaid "joblessness" in Saudi Arabia when their work with Amazon ended, but its third-party contractors prevented them from returning home.[41] Similar practices appear to persist today. Several workers interviewed for this briefing explained that they, or other workers they knew, had been left waiting weeks or months for their labour supply company to provide a new assignment, while receiving little or no salary from them – in breach of their employment contracts, as well as Saudi Arabia's own laws.[42] During these periods, workers described having little financial support and relying on loans or assistance from friends to meet basic needs. Sanjay, who had recently been fired from the warehouse when interviewed, said,

"Now, I'm jobless. I don't know when or if I would get another job. I'm just staying in the room. I can't even go home on a final exit because I don't have money and I have to buy flight ticket myself. I have to earn money, so I have to work here."[43]

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[36] See Amnesty International, *"Don't worry, it's a branch of Amazon"* (previously cited), pp. 26-27.
[37] Interview conducted remotely on 15 November 2025.
[38] Interview conducted remotely on 17 December 2025.
[39] Interview conducted remotely on 24 September 2025.
[40] Interview conducted remotely on 18 September 2025.
[41] See Amnesty International, *"Don't worry, it's a branch of Amazon"* (previously cited), pp. 26-27.
[42] Saudi Arabia's Labour Law, Articles 61-62.
[43] Interview conducted remotely on 15 November 2025.

Ayaan described the severe financial hardship he experienced after his assignment at Amazon ended around a year into his contract and he was left without pay by his supply company for three months while waiting to return home:

"Those three months were very difficult for me. I didn't have enough money in my pocket. Some of my colleagues provided food for me. I couldn't eat as much as I wanted. On some occasions, I went to another company's accommodation and ate there. I couldn't do anything because I didn't have money. I think I only had SAR 300 (USD 80) with me when I was terminated… [The supply co.] didn't give me salary for the months I was waiting to return home. But in the end, they provided a flight ticket and SAR 800 (USD 213)."[44]

Manish, employed by a different labour supply company, said that he had seen his company treat workers similarly:

"When workers get terminated from Amazon, [the supply co.] doesn't pay workers until they get another job. This company never pays. They only give SAR 300 (USD 80) for food. That's it. Workers are ready to work, but the [supply] company doesn't provide a job and doesn't pay."[45]

These experiences underscore the importance of adequate social protection measures, including income protection during periods of involuntary unemployment.[46] Yet, unlike Saudi nationals who are offered, among other things, pension and unemployment benefits, migrant workers in Saudi Arabia are excluded entirely from such benefit schemes, leaving them unprotected from loss of income when employment ends or is interrupted.[47]

3.2.2 BLOCKED FROM RETURNING HOME

Even when labour supply companies are unwilling or unable to find workers a suitable new placement and have stopped paying them, they continue to control whether and when those workers leave Saudi Arabia. Amnesty International documented this practice extensively in its 2023 report,[48] and workers interviewed for this briefing indicated that it remains a concern. Many described how they or their colleagues faced difficulties obtaining final exit visas or were pressured by supply companies to accept alternative lower-paid jobs rather than return home. Because workers could not leave Saudi Arabia without a final exit visa and faced the risk of being accused of 'absconding' by their labour supply company, many felt compelled to remain in the country despite wanting to leave.

Some said suppliers were particularly reluctant to allow workers to leave the country while their residence permits (iqama) remained valid.[49] According to them, supply companies resisted this because they saw it as wasting the money they had paid to obtain or renew the worker's iqama and other permits and authorizations required for foreign workers.

Several interviewees reported that workers seeking to return home after being fired from Amazon before the end of their employment contracts were required to pay their labour supplier before it would process their exit visa. Ravi described having experienced this himself after being "terminated" from Amazon and left without pay by his supply company. When interviewed, he'd been jobless for six weeks and said the supply company was refusing to process his exit visa, telling him: "If you want to go, pay us two months' salary and bring two people as guarantors." He explained: "How could I have money to pay them?... They don't let workers go home without completing two years of contract. If you don't have money and if you cannot bring two guarantors, you must complete your contract period here. They said they asked for the money because they paid for workers' visas."[50]

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[44] Interview conducted remotely on 4 March 2026.
[45] For more detail on the right to social protection and Saudi Arabia's obligations to ensure access to this without discrimination, see Amnesty International, *"Don't worry, it's a branch of Amazon"* (previously cited), p. 26.
[46] For more detail on the right to social protection and Saudi Arabia's obligations to ensure access to this without discrimination, see Amnesty International, *"Don't worry, it's a branch of Amazon"* (previously cited), p. 26.
[47] For more details, see ILO, *Social protection for migrant workers in countries of the Cooperation Council for the Arab States of the Gulf (GCC) A regional mapping of provisions on paper and in practice*, 28 November 2024, https://www.ilo.org/publications/social-protection-migrant-workers-gulf-cooperation-council-countries. Additionally, Saudi Arabia operates an unemployment insurance scheme (SANED), which is available to eligible Saudi nationals, but not to migrant workers. See General Organization for Social Insurance (GOSI), Unemployment Insurance (SANED), https://www.gosi.gov.sa/GOSIOnline/Unemployment_Insurance_%28SANED%29&locale=en_US
[48] See Amnesty International, *"Don't worry, it's a branch of Amazon"* (previously cited), pp. 27-28.
[49] Residence permits (iqamas), which authorize foreign nationals to reside and work in Saudi Arabia, are issued and renewed by the worker's employer. For more details, see MHRSD, Issuing and Renewing Residence Permits, https://www.hrsd.gov.sa/ministry-services/services/%D8%A5%D8%B5%D8%AF%D8%A7%D8%B1-%D9%88-%D8%AA%D8%AC%D8%AF%D9%8A%D8%AF-%D8%B1%D8%AE%D8%B5-%D8%A7%D9%84%D8%B9%D9%85%D9%84
[50] Interview conducted remotely on 17 December 2025.

Other workers likewise described delays and obstacles when attempting to return home.

Bimal said that workers in his supply company often had to wait several months, without pay, before receiving their final exit visa, despite the fact that the process could be completed by the employer almost instantly online using the Absher platform.[51] "I assume it's a kind of punishment for returning home before completing the contract", he said.[52]

Rather than facilitating workers' return home, several workers said that some of the labour suppliers would pressure those removed from Amazon's operations to accept alternative jobs, typically on lower pay and less favourable terms. Deepak described what he saw happen to colleagues:

"...if you're terminated from the job, [the supply co.] don't give you an opportunity to get another job yourself... they just dump you in the room, and say, 'We will arrange a job for you.' Like a sweeping or mopping job. Nobody wants to do a sweeper job if you studied well and came here. There is zero job security here."[53]

The consequences of this control could be particularly severe during family emergencies. Workers at two of the labour supply companies described how the companies denied them temporary exit/re-entry permits even when close family members had died. Manish said that he was unable to travel home following the death of a close relative:

"About a year ago, [he] passed away. I told [the supply co.] supervisor, "I want to go home." … But they didn't allow me to go. If they wanted to send me home, they could have done it immediately. These people are powerful and they can do everything to workers… I wanted to see [his relative's] face for the last time, but they didn't even let me go."[54]

When asked by Amnesty International why they did not apply directly for exit permits through the government platform, workers explained that they either did not know this was possible or lacked knowledge of the process. Indeed, some foreign embassies continue to state – despite the law having changed several years ago – that exit visas can only be processed by the employer, or with the employer's permission.[55]

Saudi labour law requires employers to bear the cost of a worker's return flight at the end of the employment relationship, yet some workers said labour suppliers instead told them they would have to pay for their own travel home, which they said they could not afford.[56] As Karthik explained after being told repeatedly to wait by his supply company, which was no longer paying him: "They said that they could send me home if I bore the cost of the flight ticket myself. But how could I buy a flight ticket? I didn't have money. So, I had no other option but to wait."[57]

These accounts indicate that, despite government reforms intended to expand workers' freedom of movement, under the ongoing kafala system, labour suppliers continue to exercise significant practical control over whether and when workers can return home.

In its response to Amnesty International's findings, Amazon said that it "takes seriously" its responsibility to "operate ethically" within Saudi Arabia's labour system, requiring labour suppliers to settle outstanding wages and end-of-service entitlements, explore onward work placements, and cover repatriation costs where alternative placement is not possible. It also said it had supported the repatriation of 84 workers and helped others move to alternative workplaces, and that it contractually requires third-party suppliers to provide workers with "No-Objection Certificates" to facilitate their transfer to new employers and that labour suppliers must "not impede workers who wish to exit the country". [58]

However, Amazon also said that its Supply Chain Standards and audit programme do not cover Saudi Arabia's official exit and re-entry procedures,[59] and that these are "determined by the government, not Amazon or its suppliers".[60] The company acknowledged the potential risks posed by the labour system in

[51] Absher is an online platform launched in 2010 to facilitate access for citizens, residents and visitors to services provided by the Ministry of Interior, including, among other things, the processing of exit permits online. For more details about Absher services, see https://www.absher.sa
[52] Interview conducted on 20 September 2025.
[53] Interview conducted on 4 November 2025.
[54] Interview conducted on 15 November 2025.
[55] See, for example: Embassy of India in Saudi Arabia, FAQs https://www.eoiriyadh.gov.in/page/employment-in-saudi-arabia-faqs/; https://www.gov.uk/foreign-travel-advice/saudi-arabia/entry-requirements; and GOV.UK, Foreign travel advice, Saudi Arabia https://www.gov.uk/foreign-travel-advice/saudi-arabia/entry-requirements
[56] Saudi Labour Law, Article 40 (1).
[57] Interview conducted on 12 February 2026.
[58] Amazon, *Response to Amnesty International*, 13 October 2026 (see Annex 2).
[59] Amazon, *Interim Response to Amnesty International*, 6 July 2026 (see Annex 1).
[60] Amazon, *Response to Amnesty International*, 13 October 2026 (see Annex 2).

Saudi Arabia, adding that it requires its suppliers to "maintain valid documentation for all workers and to process exit and re-entry requests in a timely manner".[61]

Nevertheless, Amazon did not provide information on steps it has taken to ensure that contracted workers released from Amazon sites are not left without income while awaiting reassignment and are not pressured to accept lower-paid roles.

Amazon acknowledged that once contracted workers leave its operations, it has limited means to monitor their conditions, maintaining that Saudi Arabia's labour system "involves dimensions that sit beyond corporate control and within government regulatory frameworks". However, Amazon's limited visibility over workers' conditions after they leave its operations is partly a consequence of its decision to rely on third-party labour suppliers, and limited control over a particular outcome does not remove its responsibility to prevent, mitigate and remedy harms linked to its business relationships. As Amnesty International's 2023 report also demonstrated, Amazon's use of such a business model in the context of Saudi Arabia can leave contracted workers without work or pay once their placement at the warehouse ends. At the same time, workers remain tied to and under the control of those suppliers, with restricted routes to leave the country, exposing them to significant human rights risks.[62]

These risks are inherent to Amazon's outsourced labour model and cannot be adequately addressed through the limited monitoring and evaluation that, as Amazon itself acknowledges, it is able to exercise in the context of Saudi Arabia. As a result, Amazon should responsibly transition away from third-party labour supply arrangements and towards direct employment of migrant workers in its operations. Doing so would allow Amazon to maintain more effective oversight of the employment relationship and key aspects of workers' conditions beyond their individual warehouse placements, including recruitment practices and fees, wages and other employment terms, accommodation, labour mobility, and access to grievance mechanisms and remedy. This would better enable Amazon to fulfil its responsibility for ensuring that the company's operations and business practices do not contribute to the types of abuses documented in this briefing.

Finally, Amazon noted that it has introduced worker education initiatives aimed at increasing awareness of workers' rights under Saudi Arabia's labour law and Amazon's own standards, and that contracted workers can raise concerns about delays, refusals or restrictive conditions relating to exit and re-entry through its grievance mechanisms. It also said that workers who have left Amazon operations have access to a separate mechanism from that available to workers at the warehouse.[63] However, this was not reflected in Amnesty International's interviews, with workers indicating that they did not feel they had a way to raise complaints once they had left Amazon's operations (see section 3.3 below for more on workers' experience accessing these mechanisms).

3.3 FEAR OF COMPLAINING

All workers interviewed for this briefing described having access to Amazon's MyVoice grievance system while deployed at Amazon. Some told Amnesty International that they felt MyVoice was an effective channel for raising anonymous concerns while they were deployed at Amazon's warehouses and they were confident doing so.

However, others remained reluctant to use it because, as in Amnesty International's 2023 research, they feared that if Amazon raised their grievances with the labour suppliers, managers from those companies might identify the source of a complaint and retaliate.[64] This fear was closely linked to workers' dependence on those suppliers: several explained that they worried complaints could affect their future employment, treatment by the supplier, or job prospects if they were later removed from Amazon's operations and returned to the supplier's control.

Sanjay spoke about the fear of reporting issues they faced:

"It's difficult for workers to complain. If workers complain to Amazon about the issues at [the supply co.], and if [the supply co.] people find it out, it may be problematic for them. Workers have come here because they have to. So, they'd rather not face the troubles. If they complain and the company kicks them out from job, it impacts their family. So, workers don't want to be in trouble."[65]

[61] Amazon, *Response to Amnesty International*, 13 October 2026 (see Annex 2).
[62] Amnesty International, *"Don't worry, it's a branch of Amazon"* (previously cited), p. 43-45.
[63] Amazon, *Interim Response to Amnesty International*, 6 July 2026 (see Annex 1).
[64] See Amnesty International, *"Don't worry, it's a branch of Amazon"* (previously cited), pp. 34-35.
[65] Interview conducted remotely on 15 November 2025.

This fear of retaliation prevented Rohan from reporting that he had paid recruitment fees. He told Amnesty International: "Workers are afraid to report grievances in case they are disclosed and [the supply co.] finds out about them and takes action against them. I also didn't submit my grievances about reimbursement [of recruitment fees] there because I was afraid."[66]

Another Indian worker, Arabaaz, explained why he also didn't report his concerns through the MyVoice system:

"I didn't do it because of [the supply co.]. If [the supply co.] people figure out that we complain about something, they treat the workers very badly. I didn't face the mistreatment personally, but when others filed some complaints against [the supply co.], the company would search for who that guy was – 'Who filed a complaint, who said this, who said that?', they would ask. If they found out, they would delay the salary of workers, etc."[67]

For Deepak, the effectiveness of Amazon's grievance system was dependent on the type of issues raised; he told Amnesty International: "If you are a green badge [contracted worker] and you complain about anything, HR directly say, 'boss, this is your and your vendor's issue. This is not an Amazon issue.' If there are concerns about salary, salary delay, accommodation, work ethics, anything, HR directly say, 'it's yours and your vendor's issue.'"[68]

Several workers interviewed also explained that once they were removed from Amazon's operations, they lost access to Amazon's MyVoice system. Amazon told Amnesty International that it operates a separate global complaints channel that is accessible to third parties and former workers regardless of their current employment status.[69] However, this was not reflected in Amnesty International's interviews, with workers describing no apparent avenue for raising complaints once they had left Amazon's operations. Several said this made it harder to challenge decisions to end their assignment or raise concerns about their treatment after leaving Amazon. As a result, they felt less protected from abuses by the labour supply companies Amazon relies on. Amazon stated that complaints received through the global channel had resulted in it taking action against non-compliant vendors, including suspending or ending commercial relationships where necessary, but did not provide Amnesty International with requested data on the number and nature of complaints received this way[70]

Workers from one of the supply companies reported that complaints submitted through their employer's WhatsApp group often go unanswered unless Amazon staff become aware of them, which would then compel the supply company to take action. Avi explained:

"We have access to the MyVoice app. We can drop complaints there too. [The supply co.] people are afraid of Amazon. As long as we work at Amazon, they solve the problems. But when workers are released from Amazon, then [the supply co.] creates problems for them."[71]

Avi's account reflects a concern raised by several workers: that any protection offered by Amazon becomes significantly weaker once workers are removed from Amazon's operations but remain dependent on the labour supplier that sponsors them.

Amazon told Amnesty International that since 2023 it had operated a confidential grievance system for contracted workers, and that in 2025 it also introduced a new grievance system for contracted workers, which includes a case management system. It also said that Amazon's teams maintain confidentiality when investigating anonymous complaints, and that it communicates an anti-retaliation policy to suppliers and workers.[72]

3.4 BETTER LIVING CONDITIONS AND PAYMENT PRACTICES, BUT WORKING CONDITIONS REMAIN HARSH

[66] Interview conducted remotely on 16 September 2025.
[67] Interview conducted remotely on 14 November 2025.
[68] Interview conducted remotely on 4 November 2025.
[69] Amazon, *Interim Response to Amnesty International*, 6 July 2026 (see Annex 1).
[70] Amazon, *Response to Amnesty International*, 13 October 2026 (see Annex 2).
[71] Interview conducted remotely on 6 December 2025.
[72] Amazon, *Interim Response to Amnesty International*, 6 July 2026 (see Annex 1).

Amnesty International heard fewer concerns about accommodation standards from the workers interviewed for this briefing than from those interviewed for its 2023 research. However, they repeatedly reported ongoing concerns about their experiences inside Amazon's fulfilment centre, including intense pressure and physically demanding work.

In Amnesty International's 2023 research, contracted workers consistently described dirty and overcrowded accommodation, with as many as 12 people sharing rooms provided by Amazon's third-party supply companies. Many reported inadequate facilities, insect infestations, unreliable water and electricity, lack of cooking gas, broken air conditioning, and frequent relocations by the supply companies.[73]

By contrast, most workers interviewed for this briefing described better living conditions which would overall meet Saudi Arabia's minimum legal requirements, with rooms typically shared by four people and hygiene standards better maintained through regular cleaning.[74]

Laksmi, a Nepali national who started his assignment at Amazon in 2024, said:

"The [supply co.] has provided us accommodation... Now, four workers sleep together. We all have separate beds. We have enough kitchen and toilets. They are good. The pest control team regularly comes to check the room. They come every month and spray pesticides."[75]

Amnesty International's research also pointed to improvements in other aspects of their employment, particularly in relation to wage-related practices. Although several interviewees reported their labour supply companies had, at times, made salary deductions, delayed monthly payments or underpaid overtime hours, these reports were less frequent and less consistent than in Amnesty International's 2023 research and, in some cases, related to issues that workers said had subsequently been resolved. Nevertheless, concerns about low salaries remained common, with workers still consistently describing their salaries as inadequate to meet their needs and support their families.[76] In its response to Amnesty International, Amazon said that it had introduced a "pay floor" for contracted workers in 2026, although it did not indicate the level at which this had been set, how the rate had been determined or whether it had already been implemented for all such workers.[77]

On the other hand, little appears to have changed in terms of working conditions inside Amazon's fulfilment centre, which remain physically and mentally exhausting. Most workers interviewed described many of the same concerns documented in Amnesty International's previous research, including intense pressure to meet productivity targets they deemed unrealistic. Workers said these targets often required them to walk many kilometres per shift and lift heavy items, while facing a constant fear of warnings or having their assignment at the warehouse ended if they failed to meet them. Workers described being constantly monitored through tracking systems and receiving warnings for what the company considers excessive "idle time", even when taking bathroom breaks.[78]

Suni, from India, described the impact of these conditions:

"I'm a picker at Amazon. This job is very difficult because I have to run constantly. By the time I arrive in my room in the evening, my legs and whole-body ache. You can imagine, if you need to walk constantly for eight hours, how you would feel at the end of the shift? In the initial days of my work, I even tracked the distance I covered in a day. It showed 26 or 28 kilometres… But it's my job. I have to work. What can I do?"[79]

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[73] See Amnesty International, *"Don't worry, it's a branch of Amazon"* (previously cited), pp. 24-26.

[74] According to Saudi Arabia's 2021 and 2024 regulations on collective housing, which set minimum standards for shared accommodations, requirements include, among other things: a minimum of 4m² of bedroom space per person (with no more than 10 occupants per room), at least one toilet and one bathroom for every eight residents, two kitchens per floor, and at least one communal area for dining and rest with 0.7m² of space per person. Bedrooms must have heating and air conditioning, safe and potable water must be readily available, and regular cleaning and pest control must be carried out. For more details see, Ministry of Municipal and Rural Affairs and Housing, 2021 Guidelines on Conditions of Collective Housing, https://momah.gov.sa/sites/default/files/2024-04/dlyl-alshrwt-alshyt-walfnyt-walslamtallazm-twafrha-fy-almsakn-aljmayt-llafrad-.pdf, pp. 3-7, 14-19; and Ministry of Municipal and Rural Affairs and Housing, Ministerial Decision No. 4500763245/1 - 1445 AH on "Health, technical, and safety requirements for collective housing for individuals", 3 March 2024, https://momah.gov.sa/sites/default/files/2024-04/dlyl-alshrwtalshyt-walfnyt-walslamt-allazm-twafrha-fy-almsakn-aljmayt-llafrad-.pdf

[75] Interview conducted remotely on 17 September 2025.

[76] Workers' salaries varied across the three supply companies. Interviewees employed by one supply company reported receiving a monthly basic salary of SAR 1,000 (USD 266), a "project allowance" of SAR 500 (USD 133) – understood to be specific to their deployment at Amazon facilities – and a food allowance of SAR 300 (USD 80). Workers employed by two other supply companies reported lower wages, with monthly basic salaries ranging between SAR 1,000 (USD 266) and 1,100 (USD 294), in addition to a food allowance of SAR 300 (USD 80).

[77] Amazon, *Response to Amnesty International*, 13 October 2026 (see Annex 2).

[78] See Amnesty International, *"Don't worry, it's a branch of Amazon"* (previously cited), pp. 31-33.

[79] Interview conducted remotely on 6 December 2025.

Such demanding conditions have been widely documented in Amazon's facilities around the world, with Amazon workers repeatedly raising their concerns about health and safety issues in the workplace, including the detrimental impact of its aggressive productivity targets.[80]

Manish, who also worked as a "picker" in the warehouse, said:

"If we work for an hour and then take rest for two to four minutes, they [Amazon managers] consider that as 'idle time'. If the idle time keeps adding up, the manager calls the workers and says, "Why are you idle?" It takes five minutes to go to the washroom from our workstation and another five minutes to come back. But he says, "You cannot spend more than 10 minutes." The distance itself is 10 minutes away, so how could we do it?"[81]

Deven, an employee of another supply company, similarly explained that workers received warnings from Amazon managers if their idle time exceeded 10 minutes. "I'm always under pressure and in fear of getting a warning or being terminated", he said. "It's not only me, but every worker at Amazon is also under pressure."[82]

Deepak, who had worked as a picker for more than a year, reported managers would threaten to fire him for not meeting targets: "The manager shouts at you – 'why you don't meet your target?'... I will give you feedback. I will terminate you".[83]

Peak periods such as White Friday and other major sales events when Amazon increases targets were particularly harsh for contracted workers who said they often struggled to keep up. Several workers told Amnesty International they feared Amazon would end their assignment if they failed to meet heightened targets after the peak season ended.

Indian worker Jayesh shared the difficulties he had faced during the latest sales period. He explained:

"About ten days ago, there was the biggest sale on Amazon, on White Friday. There was lots of work to do… We are here to work. No problem. But the thing is, they pressurize us too much…sometimes I feel, why am I here? Why should I work here? Why do they need to pressurize us to work while we're already working sincerely? That's the main issue at work. We're not robots. We're humans."[84]

In response to Amnesty International's request for information on safeguards in place, Amazon said that it has workplace health and safety systems in place to identify and address risks to workers, including risk assessments, injury investigations and reviews of performance management practices. The company said it monitors whether performance expectations contribute to health and safety risks and reviews whether particular groups of workers, including contracted workers, are disproportionately affected. It said that breaks for prayers and bathroom use are "accommodated", and that workers can raise concerns through a range of grievance mechanisms.[85]

Similar to Amnesty International's 2023 findings, many contracted workers (who wore green badges at the warehouse) interviewed for this briefing said they felt that they faced harsher conditions and weaker job security compared to Amazon's direct employees (blue badges). They told Amnesty International that they were subject to stricter performance monitoring policies, while direct hires appeared to enjoy relative leniency, job security, and in some cases, better pay, they said. Amnesty International did not interview direct Amazon employees as part of this research and therefore could not compare the experiences of the two groups.

Arjun, for example, who had been deployed to work at Amazon since 2024, felt that direct Amazon employees received little pressure to perform. He said:

"The blue badge workers are not forced or pressured at work for productivity. But green badge workers are given targets. They must achieve their targets. If they don't achieve, they get feedback for productivity. After the

[80] See, for example, The Guardian, "Get back to work: Amazon faces fresh scrutiny over workplace safety record", 22 April 2026, https://www.theguardian.com/technology/2026/apr/22/amazon-workplace-safety-record; European Trade Union Institute, "Amazon faces MEPs over gruelling conditions in European warehouses", https://www.etui.org/news/amazon-faces-meps-over-gruelling-conditions-european-warehouses; UNI Global Union, "Amazon's dangerous workplaces in India: Survey reveals abuse and exploitation", https://uniglobalunion.org/news/amazon-india-survey/; US Department of Labour, "US Department of Labor finds Amazon exposed workers to unsafe conditions, ergonomic hazards at three more warehouses in Colorado, Idaho, New York", 1 February 2023, https://www.osha.gov/news/newsreleases/national/02012023; and UNI Global Union, "Life in the Amazon Panopticon: An International Survey of Amazon Workers", January 2023, https://uniglobalunion.org/wp-content/uploads/UNIAMZN_Report.pdf

[81] Interview conducted remotely on 11 November 2026.

[82] Interview conducted remotely on 15 December 2025.

[83] Interview conducted remotely on 4 November 2025.

[84] Interview conducted remotely on 15 November 2025.

[85] Amazon, *Interim Response to Amnesty International*, 6 July 2026 (see Annex 1).

first and second feedback, these workers are terminated…They are treated like robots, not like humans. It's very hard to meet the UPH [Units Per Hour] targets."[86]

Amazon denied applying different productivity expectations to contracted workers, and told Amnesty International that workers receive coaching and support before any formal performance-related action is taken, and that all such decisions are reviewed internally before approval.[87]

LEGAL FRAMEWORK

SAUDI ARABIA'S INTERNATIONAL OBLIGATIONS

Although Saudi Arabia has not ratified several key United Nations (UN) human rights treaties protecting civil, economic, political, and social rights,[88] including the main treaty on migrant workers' rights,[89] it remains bound by international obligations under treaties addressing discrimination, torture, and trafficking in persons,[90] albeit subject to broad reservations.[91]

Additionally, as a UN member, Saudi Arabia is expected to maintain the highest standards in the promotion and protection of human rights[92] and give effect to the principles enshrined in the Universal Declaration of Human Rights (UDHR). The UDHR sets out a range of civil, economic and social rights, many of which are regarded as reflecting customary international law and cover some of the abuses documented in this briefing.[93] For instance, Saudi Arabia should ensure that everyone living on its territory has the right to social security, the right to work, including just and favourable conditions, and the right to secure the realization of economic, social and cultural rights without discrimination.[94]

The country has also ratified key ILO conventions[95] and, as an ILO member state, is required to uphold fundamental labour rights despite not having ratified all core labour conventions.[96]

Finally, as a party to various international treaties prohibiting forced labour and other human rights abuses, Saudi Arabia is also obliged to protect workers from being exploited by companies operating in its territory. This requires the government to take appropriate measures to prevent human rights abuses by private actors and proactively monitor and respond to these abuses when they occur, investigate them, hold perpetrators to account and ensure effective remedy for harm caused.[97]

Days after Amnesty International and other media outlets[98] published evidence of serious abuses against contracted migrant workers in Amazon's warehouses in Saudi Arabia in 2023, the Saudi government announced that it had launched its own investigation into what it described as the "distressing reports".[99] More than three years later, Amnesty International has been unable to find any publicly available information about the scope, methods or outcomes of the investigation, and the Ministry of

[86] Interview conducted remotely on 8 November 2025.
[87] Amazon, *Interim Response to Amnesty International*, 6 July 2026 (see Annex 1).
[88] International Covenant on Civil and Political Rights (ICCPR); International Covenant on Economic, Social and Cultural rights (ICESCR).
[89] International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.
[90] International Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), UN Convention against Torture (CAT); International Convention on the Elimination of All Forms of Racial Discrimination (ICERD); UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (the Palermo Protocol).
[91] Saudi Arabia has made general reservations to nearly all the international conventions it has ratified, arguing in most cases that it is not bound by the Conventions to the extent to which they contradict Islamic law (except for the Convention on the Rights of Persons with Disabilities and its Optional Protocol).
[92] Resolution 60/251, adopted by the UN General Assembly on 3 April 2006, para. 9.
[93] See, for example, William A. Schabas, The Customary International Law of Human Rights, Chapter 9, Oxford Academic, June 2021, https://academic.oup.com/book/39904/chapter-abstract/340150337?redirectedFrom=fulltext
[94] Article 22 of the UDHR and Article 4 of the ICERD.
[95] ILO, "The ILO in Saudi Arabia", https://www.ilo.org/beirut/countries/saudi-arabia/lang--en/index.htm
[96] ILO Declaration on Fundamental Rights and Principles at Work and its Follow up, 1998, ILO Constitution, 1919 and Declaration of Philadelphia annexed to the ILO Constitution, 1944.
[97] Saudi Arabia's duty to protect people from human rights abuses carried out by corporations is also articulated in the 2011 UN Guiding Principles on Business and Human Rights.
[98] The Guardian, "Amazon has links to trafficking claims over Saudi Arabia workers abuses", 10 October 2023, available at: https://www.theguardian.com/technology/2023/oct/10/amazon-trafficking-links-saudi-arabia-workers-abuse; ICIJ, "Amazon warehouse workers in Saudi Arabia say they were exploited by labor supply companies", 10 October 2023, https://www.icij.org/investigations/trafficking-inc/amazon-warehouse-workers-saudi-arabia-exploited/
[99] Barrons, "Saudi Probes Alleged Abuses At Amazon Warehouses: Statement", 12 October 2023, https://www.barrons.com/news/saudi-probes-alleged-abuses-at-amazon-warehouses-statement-358e03eb

Human Resources and Social Development has not responded to the organization's multiple requests for information on this between 2024 and 2026.[100]

CORPORATE HUMAN RIGHTS' RESPONSIBILITIES

All companies must respect the contractual obligations made to workers, as well as Saudi Arabia's laws and regulations.[101] Further, under the UN Guiding Principles on Business and Human Rights, both Amazon and its third-party labour supply companies have a responsibility to respect international human rights law and standards, which includes taking measures to ensure that their operations do not cause, contribute to, or are directly linked to human rights violations. Companies also should use their leverage to stop human rights abuses from taking place. This is independent of the government's obligations.[102]

The labour supply companies employing and supplying migrant workers for Amazon's warehouses are responsible for ensuring that their recruitment and employment practices are not involved in abuses – for example by paying workers their contractually entitled salaries and ensuring their freedom of movement – and for remediating harms when they do occur.

Amazon also has a responsibility to respect human rights throughout its own operations, including in its warehouses, and to prevent and address adverse human rights impacts throughout its operations, including through its business relationships – such as with labour supply companies – even where it has not caused those impacts. [103]

In line with international human rights law and standards, Amazon should be transparent and accountable to both human rights victims and the wider public. It should communicate proactively and regularly on its efforts to identify, mitigate and remediate human rights harms, and on progress achieved in the remediation programme. Reporting should include sufficient detail, including anonymized or aggregated data where necessary to guarantee the safety of individual workers, to enable meaningful assessment of the effectiveness and outcomes of these efforts.[104]

A comprehensive analysis of Saudi Arabia's obligations under international human rights law, as well as Amazon's responsibilities reflecting the period between 2021 and 2023, can be found in Amnesty International's October 2023 report, "*Don't worry, it's a branch of Amazon": Exploitation of migrant workers at Amazon facilities in Saudi Arabia*.[105]

[100] Letters from Amnesty International to Saudi Arabia's Ministry of Labour and Social Development, dated 12 March 2024 (Reference: TG MDE 23/2024.5308); 6 September 2024 (Reference: TG MDE 23/2024.5963); and 28 September 2026 (Reference: TG MDE 23/2026.8033). On file with Amnesty International.
[101] For further details of the applicable international legal framework, see Amnesty International, *"Don't worry, it's a branch of Amazon"* (previously cited), pp. 36-47.
[102] Human Rights Council, *Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, Report of the Special Representative of the Secretary-General on the issue of human rights and transnational corporations and other business enterprises (UN Guiding Principles),* John Ruggie, UN Doc. A/HRC/17/31
[103] UN Human Rights Council, *UN Guiding Principles*, Principles 11, 13, 17, 19, 22 and 29-31 (previously cited).
[104] Accounting for how a company is addressing its human rights risks and impacts is part and parcel of an adequate human rights due diligence process under the UN Guiding Principles. See, in particular, Principle 21. See also OHCHR, Improving accountability and access to remedy for victims of business-related human rights abuse through State-based non-judicial mechanisms, A/HRC/38/20, 14 May 2018, paras 8.2 and 10.3. Also OHCHR, Improving accountability and access to remedy for victims of business-related human rights abuse through non-State-based grievance mechanisms, A/HRC/44/32, 19 May 2020, para. 11.2 (recommending regular and detailed public reporting on the functioning and performance of remedial mechanisms).
[105] Amnesty International, *"Don't worry, it's a branch of Amazon*" (previously cited).

4. CONCLUSION AND RECOMMENDATIONS

Amnesty International's latest research indicates that Amazon has made some improvements in its Saudi Arabian operations since 2023, including reimbursing hundreds of workers' unlawful recruitment fees and taking steps to reduce future fee-charging, while also acting on accommodation standards and grievance mechanisms. A few workers who had been reimbursed for costs they paid during recruitment told Amnesty International that this had been crucial in helping them repay debts and support their families, and urged Amazon to continue this practice. These measures show that companies have leverage in the face of abusive recruitment and employment practices by third-party suppliers, and that concerted interventions can make a difference to contracted workers' lives.

At the same time, Amnesty International remains concerned by workers' reports of conditions within Amazon's own facilities, including issues over which the company exercises direct control, such as intense productivity targets, pressure from managers, and the constant threat of losing work. These findings underscore that Amazon must continue to strengthen its efforts to identify, prevent and remedy human rights risks arising from its own operational practices.

Amnesty International's research also demonstrates that the broader human rights context in which companies operate can significantly shape workers' experiences and limit the effectiveness of efforts to address individual risks and abuses. Amazon's decision to continue relying on third-party labour suppliers in the context of Saudi Arabia's kafala system left migrant workers vulnerable to deception, exploitation and other human rights abuses. Contracted workers in both this research and that conducted for Amnesty International's 2023 report described fraudulent recruitment processes, periods of joblessness without pay, barriers to changing employers and difficulties returning home. In many cases, these harms were linked not only to the conduct of individual labour suppliers, but also to the government's sponsorship system that continues to grant employers and labour providers significant control over migrant workers' employment and immigration status.

As a result, although workers reported improvements in some areas, these gains were often contingent on remaining deployed at Amazon facilities. Amazon itself acknowledged that it has limited means of monitoring contracted workers' conditions once they leave its operations. This highlights a significant challenge inherent in the labour supply model: workers may remain vulnerable to abuse after their deployment at Amazon ends, while falling outside the direct oversight mechanisms on which Amazon primarily relies. While company-level interventions can improve conditions in some areas, they cannot fully mitigate risks arising from use of these outsourced arrangements operating within the wider kafala system.

Saudi Arabia has an obligation to protect workers from abuse, ensure access to effective remedy, and provide adequate social protection without discrimination. This research demonstrates the need for Saudi Arabia to effectively dismantle the kafala system in practice so that all workers can freely change employers and leave the country, strengthen oversight of labour supply companies, and provide effective remedy when abuses occur. Amazon, meanwhile, has an independent responsibility to identify and address adverse human rights impacts throughout its value chain, including by ensuring adequate remediation when harms occur.

As Amnesty International noted in its 2023 report, providing remedy requires not only addressing past harms but also taking measures to guarantee their non-repetition. A key concern identified in that report was that

contracted workers often became more vulnerable to abuse once their deployment at Amazon facilities ended and they were left dependent on labour suppliers for work, income, immigration status and their return home. The findings of this briefing suggest that these risks have not been adequately addressed. Despite improvements in some other areas, workers continued to report Amazon's third-party supply companies subjecting them to periods of unpaid joblessness, pressuring them to accept lower-paid work, and creating barriers to them changing employers and leaving the country. These findings indicate that contracted migrant workers remain exposed to risks that arise at the intersection of Saudi Arabia's kafala system and Amazon's continued reliance on third-party labour suppliers.

Under international law and standards, where a company's operations and business relationships are directly linked to recurring human rights harms, it is expected not only to use its leverage to prevent and mitigate those harms but also to assess whether existing business arrangements adequately address the risks they create. To the extent that Amazon continues to rely on third-party labour suppliers in Saudi Arabia, it remains responsible for preventing and addressing adverse human rights impacts linked to those business relationships. While responsibility for dismantling the kafala system lies with the Saudi authorities, Amazon must ensure that its own practices and business relationships do not contribute to the heightened risks that the system creates for workers employed through labour intermediaries.

Given the persistence of the harms documented in Amnesty International's 2023 and 2026 research, and the limited oversight Amazon has once contracted workers leave its operations, Amazon should move towards responsibly disengaging from this labour model by progressively reducing its reliance on third-party labour suppliers and increasing the direct employment of workers performing core functions within its operations. This would constitute an important step towards guaranteeing the non-repetition of abuses and reducing workers' heightened vulnerability to exploitation. In the meantime, while it continues to rely on labour suppliers, Amazon should implement effective safeguards to ensure that workers can freely transfer employment or return home, and that they continue to receive pay or suitable alternative work when their engagement at Amazon ends.

Against this backdrop, the recommendations below set out measures that the Saudi Arabian authorities, Amazon and its labour supply companies should take to fulfil their respective obligations and responsibilities, address remaining protection gaps, and reduce migrant workers' vulnerability to abuse.

4.1 RECOMMENDATIONS

4.1.1 TO AMAZON

- Responsibly disengage from the outsourced labour model in Saudi Arabia by progressively reducing reliance on third-party labour supply companies and bringing contracted workers performing core functions in-house as direct employees. This should be done while safeguarding workers from adverse human rights impacts, including those related to jobs, pay and benefits throughout the transition. In the meantime:
    - Ensure the effective implementation of existing contractual requirements on onward placement, job transfers, and repatriation by proactively monitoring suppliers' compliance, engaging directly with workers whose Amazon placements have ended, and taking corrective action where former workers are left without legal status, income, or freedom of movement.
    - Ensure that third-party suppliers immediately offer suitable alternative employment to contracted workers, with at least the same terms and conditions, if their engagement with Amazon ends. If such work is not provided, Amazon should nonetheless ensure that contracted workers continue to be paid their monthly salary and allowances, in line with their employment contracts.
    - Play a more active and direct role in recruitment to ensure that all workers, including contracted staff, are made fully aware of the nature of their engagement with Amazon, including that they will be deployed on a temporary basis at its facilities and will not be directly employed by Amazon.
    - Ensure that all workers are aware of mechanisms through which they can raise complaints with Amazon, even after they leave its facilities.

    - Regularly publish sufficiently detailed, disaggregated data on the treatment of contracted workers in Amazon's operations. This should include data on recruitment, wages and working hours, working and living conditions, grievances and access to remedy, and measures taken to address abuses identified among labour supply companies.

- Continue implementing Amazon's remediation programme to ensure that all former contracted workers are reimbursed for recruitment fees and related costs incurred in moving to Saudi Arabia for work at Amazon facilities, without requiring receipts or other forms of proof. In parallel, continue monitoring recruitment-related payments among current and newly recruited contracted workers and ensure their full and prompt reimbursement whenever they are identified.
- Empower contracted workers by providing pre-departure and regular training and other forms of awareness-raising on their rights under Saudi Arabian law and Amazon's own standards, in particular their rights to change jobs and exit the country without employer permission.
- Guarantee fair and safe working conditions for all workers, regardless of employment status, including realistic productivity targets, adequate rest breaks, and safeguards against the arbitrary ending of assignments.
- Continue to strengthen grievance mechanisms to ensure confidentiality, accessibility, and protection from retaliation, including for workers whose assignments have ended or are between placements.
- Adequately compensate workers for all mental and physical harms suffered.

4.1.2 TO THIRD-PARTY LABOUR SUPPLY COMPANIES

- Monitor payment of recruitment fees and related costs by workers, including medical tests, travel costs, and any other expenses incurred during the recruitment process, and promptly reimburse them without requiring evidence.
- Strengthen oversight and due diligence of recruitment agents and intermediaries to ensure they do not charge prospective workers any fees.
- Ensure all workers are made aware of the full terms and conditions of their employment and the nature of their employer by being given a contract in an accessible language and format well in advance of their departure and agreement to accept the terms and conditions.
- Facilitate workers' ability to change employers (job transfer), particularly in cases where workers have been rendered jobless after their assignment at Amazon has ended or where labour supply companies cannot provide them with suitable alternative placements, as well as ensuring that they are aware of their right to change employers and exit the country and how to go about this process.
- Ensure timely and transparent processing of exit permits and flight arrangements for any worker wishing to return home, including those who have lost their jobs or whose contracts have effectively ended.
- Ensure full wage payments for all workers under contract, including those awaiting reassignment, and immediately pay any outstanding wages and benefits owed.
- Refrain from pressuring workers to accept lower-paid roles and/or alternative roles that significantly differ from the positions they were recruited for, unless such reassignment is genuinely voluntary, aligned with workers' skills, and offered with full, informed consent.
- Establish clear, accessible, multilingual grievance mechanisms that workers can use without fear of retaliation, and ensure workers are informed of these mechanisms in languages they understand.
- Provide timely and adequate remedy to all current and former workers who faced human rights abuses, including by compensating them for all harms suffered and reimbursing all unpaid salaries, food allowance, overtime pay and end-of-service benefits, including for periods when workers were "jobless", as well as any unlawful fees paid in the course of being recruited to the company, even without proof of payment.

4.1.3 TO THE GOVERNMENT OF SAUDI ARABIA

- Publish the findings of its earlier reported investigation into abuses in Amazon's facilities in Saudi Arabia and any action taken in response.
- Strengthen labour inspections and oversight of companies employing migrant workers – especially labour supply companies – ensuring compliance with both national and international human rights and labour law and standards.
- Effectively dismantle the kafala system in law and practice, including by removing all requirements for employer permission for migrant workers to change jobs and exit the country.
- Increase awareness among migrant workers – in languages they can understand – of their rights in the country, the recent labour reforms and how they can access available redress mechanisms if they face abuse.
- Ensure that all migrant workers have equal access to all social protection measures in line with their right to social security and without any discrimination, including access to unemployment benefits and other measures so that they can access their right to an adequate standard of living.

For additional recommendations, including to the governments of migrant workers' origin countries, see *"Don't worry, it's a branch of Amazon".*

5. ANNEX 1

AMAZON'S INTERIM RESPONSE TO AMNESTY INTERNATIONAL – 6 JULY 2026

Interim Response to Amnesty International
6 July 2026

We would like to thank Amnesty International ("Amnesty") for its correspondence dated 12 June 2026, regarding contracted workers in Amazon's operations in the Kingdom of Saudi Arabia ("KSA"). We welcome continued engagement on this issue and take the concerns raised seriously. As we understand Amazon will have another opportunity to respond in advance of Amnesty publishing its final report, we are providing this interim response to answer the questions you included in your correspondence.

Amazon is committed to respecting internationally recognized human rights and the fundamental dignity of the people who support our entire value chain. Our long-established approach codified in our Global Human Rights Principles and Supply Chain Standards demonstrates our support for fundamental human rights and for safe, healthy, and fair working conditions in every country where we operate. We believe transparency is critical in driving continuous improvement and helping address systemic issues affecting supply chain workers. We are committed to continuously strengthening our approach over time and to respecting the fundamental dignity of people throughout our value chain.

Since our first correspondence with Amnesty in 2023, Amazon has continued to invest in strengthening protections for contracted migrant workers supporting our operations in KSA and wherever we operate. Below we answer your questions regarding our efforts to advance worker protections in our fulfillment operations in KSA:

Question 1: What new measures has Amazon introduced over the past two years to identify, prevent and address deceptive recruitment practices within its supply chain, including misleading job offers and misinformation provided by third-party vendors or recruiters?

Protection for migrant workers requires focus at all stages of the migration journey, from origin communities before workers travel, to detection and addressing concerns after arrival.

Prevention at country of origin: In 2025, Amazon launched a yearlong initiative with the International Organization for Migration in Nepal focused on migrant workers' rights in high-risk supply chain corridors, aligning with Nepal's National Action Plan on Business and Human Rights. Under this partnership, we launched a set of initiatives to address pre-departure migrant worker vulnerability in Nepal, one of the most common countries of origin for migrant workers in the Gulf. To date, this work has reached 3,736 people through community mobile clinics, migration schools, and peer-learning sessions. Knowledge gains in 2025 were measurable: participant scores on safe migration processes, labor rights, and human trafficking/fraud risks rose from 71-76% pre-session to 87-88% post-session. We engaged returned migrants from the Gulf as peer educators to share first-hand experiences with their communities, helping aspiring workers spot risks with agencies that charge illegal fees or misrepresent conditions in destination countries. Following on our success in Nepal, we are developing similar programming in additional countries of origin.

Prevention in destination country: Amazon's requirements for third-party licensed temporary labor agencies ("3P vendors") on worker protections and responsible recruitment are detailed in our Supply Chain Standards ("Standards"). We confirm 3P vendor conformance with these Standards through ongoing social audits in KSA and operate a dedicated grievance mechanism accessible to contracted workers in KSA allowing workers to report any concern, including those about recruitment, confidentially. We educate our 3P vendors to communicate roles clearly so candidates understand what the job will be and who will be their employer. In 2026, Amazon published a Guide on Addressing Forced Labor Risks to provide 3P vendors and other suppliers with guidance on identifying forced labor risks in their workforce, including recruitment risks. To support our KSA 3P vendors in recruiting responsibly, in 2025 we began connecting them with overseas recruitment agencies that operate on a strict Employer-Pays Principle basis. Over 1,500 workers have since deployed to Amazon operations in KSA via these agencies.

Question 2: Has Amazon updated or implemented any new policies or procedures to ensure that no worker pays recruitment fees or related costs at any stage of the recruitment process? In what circumstances will Amazon directly reimburse such costs incurred by contracted workers?

Amazon adopted a zero worker-paid recruitment fees policy in 2018 as part of our Supply Chain Standards and has been actively working with our suppliers globally ever since to ensure they meet that standard. In 2024, we adopted an additional standard that establishes required procedures for calculating worker-paid fees and making fee reimbursements. This additional standard helps create consistency in recruitment fee remediation. While Amazon requires 3P vendors to bear the cost of worker-paid recruitment fees, in some instances we have reimbursed workers directly to expedite remediation.

Question 3: What guidance does Amazon provide to third-party vendors on how they should respond when workers report having paid recruitment fees and related costs but are unable to provide documentary proof?

When workers report recruitment fees without documentary proof, Amazon's guidance directs 3P vendors to investigate using all available evidence, including worker testimony and industry data on average fees paid per recruitment corridor. Amazon recognizes that documentary proof may not always be available in recruitment fee cases. For example, our Guide on Addressing Forced Labor Risks, which is published on the Amazon Sustainability Exchange, states that receipts or other evidence of fees paid may not be available, and that this must not limit the determination of remedy amounts. We are aware that fees are often paid in cash, through informal channels, or to intermediaries who do not issue documentation, and that should not prevent effective remediation.

Question 4: What new monitoring, verification, or audit mechanisms has Amazon implemented to assess suppliers' compliance with its policy on prohibition of recruitment fees?

As described in our response to Question 1, Amazon confirms 3P vendor conformance with our Supply Chain Standards through ongoing social audits, each including confidential worker interviews designed to surface issues such as recruitment fee payment. Amazon also initiates case-specific investigations when concerns are raised through worker grievance channels or third parties.

Question 5: Since 2023, has Amazon made any changes to its policies or practices regarding the job security of contracted workers and imposition on vendors of any minimum guarantees for workers once they are deployed to Amazon warehouses? What steps, if any, has Amazon taken to better ensure that these are accurately communicated to contracted workers prior to their recruitment by the vendors?

Question 6: Since 2023, has Amazon made any changes to how it monitors and mitigates the risks migrant workers face when they lose their placement at Amazon before the end of their contract with third-party vendors, including potential loss of wages and adequate accommodation, or pressure to accept lower-paid jobs? And how does it ensure that vendors handle these situations fairly and lawfully?

Question 7: Since 2023, has Amazon made any changes to how it ensures that contracted workers who have been released from placement at Amazon sites do not face restrictions on their rights to freedom of movement and to work, and are able to change employers or return home in line with international and national laws?

(Combined response to Questions 5-7): Amazon has procedures it applies to 3P vendors in KSA that govern personnel management. 3P vendors are responsible for managing workforce transitions, maintaining worker-level records, and documenting outcomes, including re-deployment to alternative projects, repatriation support, payment of outstanding wages, and any end of service benefits.

Regarding workers who reach the end of their tenure with Amazon, Amazon reviews documentation and engages with 3P vendors as needed to verify that the vendors manage transition processes, including payment of end-of-service entitlements through applicable wage protection mechanisms, in accordance with contractual requirements and our Supply Chain Standards. For example, vendors must explore onward placement for affected contracted workers before initiating final exits and must provide workers with minimum notice periods.

Question 8: Does Amazon require vendors to track and report on whether contracted migrant workers can access exit, re-entry procedures, including any delays, refusals, or restrictive conditions?

Amazon's Supply Chain Standards include requirements on worker freedom of movement in any supplier-controlled facility, prohibit passport withholding, and require reasonable exit and entry from supplier-provided residential facilities. Conformance is assessed through our audit program and worker interviews. Workers have access to grievance mechanisms to raise concerns about delays, refusals, or restrictive conditions relating to exit and re-entry. Our Supply Chain Standards and audits do not cover official KSA exit and re-entry procedures.

Question 9: What steps has Amazon taken since 2023 to ensure that contracted migrant workers are informed about the legal changes introduced in recent years?

Third-party vendors are contractually required to communicate material legal changes to their employees. In addition to 3P vendor obligations, Amazon launched a dedicated worker education campaign in 2024 in KSA. The campaign educates contracted workers in KSA on their rights under local labor law and the requirements in Amazon's Supply Chain Standards. Content is delivered through multiple channels, with an embedded mechanism for workers to raise concerns.

Question 10: Since 2023, has Amazon made any changes to how it sets and reviews productivity targets for contracted workers, including any differences from those applied to direct Amazon employees? What safeguards ensure these expectations are realistic, safe, and not unfairly punitive (e.g., treatment of 'idle time', including toilet breaks)?

We do not apply different or higher productivity expectations to contracted workers. Amazon's performance coaching model requires that contracted workers receive documented coaching and access to support resources before any formal performance action, with independent review by Amazon teams. Bathroom breaks, prayer time, and other necessary personal time are accommodated. An on-site governance system reviews all performance-driven decisions prior to approval. Finally, contracted workers have access to multiple mechanisms to raise concerns, including about working conditions and productivity expectations.

Question 11: Since 2023, has Amazon made any changes to how it monitors and assesses whether its performance-management systems create risks of potentially dangerous working conditions and health impacts and what corrective actions are taken when such risks are identified?

Amazon's workplace health and safety function operates independently of operations leadership and monitors risk indicators and environmental conditions in relation to operations. This team, with support from operations teams, completes proactive risk assessments to identify and control hazards before they result in injury. Leadership-led safety observations assess whether operational pace elevates risk exposure for associates. Mandatory investigations of all serious injuries assess whether performance pressure was a contributing factor, and the team documents and tracks any corrective actions needed using an internal reporting system. Site leadership reviews patterns in performance actions to identify whether any cohort, including contracted workers, is disproportionately impacted.

Question 12: Since 2023, has Amazon implemented any safeguards to ensure that performance-based warnings and termination decisions for contracted workers are not arbitrary, and how does the company ensure that workers can safely challenge any accusations or resulting penalties?

Since 2023, Amazon introduced a confidential grievance mechanism dedicated to contracted workers so they can raise concerns about any workplace issue, without fear of retaliation. This channel operates independently of the 3P vendor, giving contracted workers a direct opportunity to raise complaints to Amazon. In addition, performance-related actions, including warnings or separations, proceed as per the strict governance system on site, with human involvement. Associates receive support and appropriate review before any formal decision is made.

Question 13: What specific steps has Amazon taken since the end of 2023 to strengthen the accessibility, effectiveness, and confidentiality of grievance mechanisms for contracted workers in Saudi Arabia, and how does Amazon assess their implementation and impact?

In 2025, Amazon put in place a technology-enabled, multi-channel grievance ecosystem for contracted workers in KSA. Contracted workers have access to a formal case management system to raise concerns directly with Amazon, including performance-related issues, working conditions, and recruitment fee complaints. Amazon also operates a globally accessible complaints webform available in 19 languages, including Hindi, Bengali, Tamil, Telugu, Kannada, Marathi, Arabic, Vietnamese, and Chinese, covering major countries of origin of migrant workers employed by

Amazon 3P vendors in KSA. The webform requires no Amazon credentials or active employment and supports anonymous submissions. Any worker, former worker, or third party can raise a concern at any time.

Question 14: What steps does Amazon take to foster a culture of trust and confidence among contracted workers so that they feel safe using the company's grievance mechanisms, and what safeguards are in place to prevent retaliation by vendors when workers raise concerns?

Amazon offers grievance channels that are operated by Amazon teams, not by 3P vendors. Contracted workers can report issues without their employer being notified of who raised the concern. Our anti-retaliation policy is communicated to 3P vendors during their onboarding process and to workers when we make them aware of grievance channel interfaces. Investigating teams follow procedures to preserve confidentiality when investigating anonymous submissions.

Question 15: Are Amazon's grievance channels still accessible to contracted workers who have been released from Amazon sites, suspended, or are awaiting redeployment, and if so, how is continued and anonymous access ensured?

Amazon's complaints webform is accessible regardless of employment status. Anyone, including former contracted workers, can submit concerns anonymously, without needing to identify themselves or demonstrate any current relationship with Amazon.

Question 16: Has Amazon disengaged from any suppliers since 2023, including those identified in Amnesty International's previous research? If so, could you explain the reasons, circumstances of and outcomes of these disengagements, and what measures were taken to ensure this was undertaken responsibly to ensure it could not cause any unintended consequences?

We recognize terminating business relationships removes the incentive for improvement and can negatively impact workers and communities. Amazon adopted responsible disengagement guidelines in 2024 to help mitigate human rights risks that may occur during supplier exits, encouraging remediation whenever possible, and recognizing that disengagement should be used only as a last resort. We have disengaged from some KSA 3P vendors since 2023.

Question 17: What additional steps does Amazon plan to take to address the structural risks inherent in relying on third-party contracting in Saudi Arabia, particularly in a context where the kafala system continues to restrict workers' mobility and heighten their vulnerability to abuse?

Beyond the specific initiatives described above, Amazon's approach to third-party contracting risk in the region focuses on the well-being of the worker. We maintain independent, confidential grievance channels and conduct site assessments, ensuring workers can raise concerns without relying solely on their employer. Supplier contracts incorporate our Supply Chain Standards, and we take action in instances where there is non-conformance with Amazon's Standards. We continue to evaluate additional interventions, including digital worker voice tools and engagement with industry coalitions.

Question 18: Beyond any changes Amazon has made to safeguard workers' rights within its operations in Saudi Arabia, could you also provide details of any policy or practice changes the company has implemented since end 2023 in regard to human rights due diligence across its operations in the wider Gulf region, where kafala sponsorship systems remain in place and migrant workers continue to face serious risks of abuse and exploitation?

Amazon's human rights due diligence framework is enterprise-wide and applies to our businesses globally. Our approach involves identifying salient human rights risks, integrating findings into decision-making, tracking responses, and communicating outcomes. We are working to scale beyond KSA the program we began in 2025 to connect KSA 3P vendors with overseas recruitment agencies that operate on a strict Employer-Pays Principle basis. In 2025, Amazon began conversations with other private sector companies in the region to define collaborative efforts to address complex labor rights issues within supply chains with a focus on high-risk areas, including migrant worker recruitment.

6. ANNEX 2

AMAZON'S RESPONSE TO AMNESTY INTERNATIONAL – 13 OCTOBER 2026

Response to Amnesty International

13 October 2026

We write in response to Amnesty International's correspondence dated 12 June and 28 September 2026 about human rights risks in connection with Amazon's operations in the Kingdom of Saudi Arabia ("KSA"). On 6 July, Amazon responded to an initial set of questions from Amnesty International, and we intend this response to supplement those answers.

Since 2023, we have continued to invest in programs in KSA that put our policies and principles into practice, strengthen performance by our third-party licensed temporary labor agencies ("3P Vendors"), and advance protections for migrant workers who are staffed to Amazon by our vendors ("contracted workers").

Amazon's presence in KSA and our continued investment in worker protections are making a difference. We are not aware of comparable programs at this scale in the region. While we have not solved every challenge, our approach reflects a deliberate choice to remain engaged and invest in raising the bar for migrant workers rather than withdraw. We have dedicated teams in the region focused on these efforts and remain available for further engagement.

Amnesty International's findings confirm positive changes and trends. Workers interviewed by Amnesty reported receiving reimbursement for costs they had paid, and the findings reference fewer complaints related to recruitment fees, wages, and accommodation. We are encouraged by this, and it reinforces our own data: the programs we are continuing to invest in are reaching workers and producing beneficial results.

Points of Clarification on Amnesty International's Investigation

We engage constructively with human rights organizations such as Amnesty International and take their inquiries seriously. However, we have questions about aspects of Amnesty International's latest investigation. We would welcome greater clarity from Amnesty International on what it means by "many" and "some" when characterizing the experiences of the 24 workers it interviewed. Thousands of contracted workers support Amazon's operations in KSA, and understanding the scale and distribution of specific issues is important: it helps us determine whether Amnesty's findings reflect a systemic trend that requires a different approach, or whether these are individual cases that, while still important, require further investigation. Without this clarity, it is difficult for us to conduct a root-cause analysis and direct attention where needed. We request that Amnesty International share with us a breakdown of how many of the workers reported paying recruitment fees, how many reported issues with wages or accommodation, and how many reported not experiencing these issues, so we can investigate further and take appropriate action.

Amazon's Approach to Worker Protections in KSA

Amazon's Supply Chain Standards ("Standards") apply globally to all suppliers of goods and services across the many industries and geographies in which we operate. The Standards are grounded in leading international standards and frameworks, including the UN Guiding Principles on Business and Human Rights and the Core Conventions of the International Labor Organization. While the Standards apply globally to all our suppliers, our risk assessment approach enables businesses to understand the risks

and opportunities most relevant to the workers and communities they affect and embed management systems and mitigation measures accordingly.

Recruitment Practices and Fee Reimbursement

All of Amazon's 3P Vendors in KSA are contractually obligated to meet our Standards; this includes a prohibition on worker-paid recruitment fees and a requirement that, if workers are discovered to have paid recruitment fees, employers are responsible for reimbursing them. Where we have identified that workers have paid fees, we have acted decisively:

- Since we launched our social audit program for 3P Vendors in KSA in 2023, we have facilitated the **reimbursement of over $2.45 million in recruitment fees to 1,180 contracted workers**.
- In 2023, we began connecting Amazon fulfillment 3P Vendors with recruitment agencies that operate on the "employer-pays" recruitment principle. This is now the standard recruitment channel for contracted worker hiring in KSA, with **over 1,500 contracted workers hired through these channels to date**, including approximately 1,000 from Nepal.
- Where 3P Vendors have failed to meet our Standards after sustained engagement, we **terminated those relationships while seeking to disengage responsibly** and support affected workers, including by supporting repatriation and payment of any outstanding entitlements.

We note that Amnesty International's findings on recruitment fees do not distinguish between fees paid through recruitment channels Amazon established versus those arising from pre-existing 3P Vendor practices that we are working to address. Much of the $2.45 million in reimbursements reflect fees charged before Amazon's ethical recruitment channels were in place, and our actions demonstrate the kind of remediation that responsible business conduct requires.

Addressing Root Causes of Migrant Worker Vulnerability

Amazon recognizes the heightened vulnerability of migrant workers and has invested in addressing root causes in addition to facilitating remediation of findings:

- **IOM partnership**: Under our partnership with the International Organization for Migration (IOM), we launched initiatives in 2025 to help prevent workers from experiencing labor rights-related risks when migrating to KSA from Nepal, one of the most common countries of origin of migrant workers in the Gulf. Sixty-two activities – including pre-departure orientation sessions, community mobile clinics, and peer-learning led by returned migrants from the Gulf who shared first-hand experiences – reached over 3,700 individuals in high out-migration communities. Post-program assessments show labor trafficking awareness among participants increased from 76% to 90%.
    - Through our partnership, we also trained over 120 recruitment agents in responsible recruitment practices and convened 84 institutions across sectors to develop practical recommendations for reducing migration costs and improving worker protections along the Nepal-Gulf corridor.
    - We are now extending IOM partnership programming to additional origin countries involved in Gulf corridor migration.

- **Pay floor**: Amazon engaged with 3P Vendors and studied worker feedback regarding pay practices leading to Amazon introducing a pay floor for contracted workers in our fulfillment operations in KSA this year.
- **Dedicated grievance mechanism**: In 2025, we launched a dedicated grievance mechanism accessible to all contracted workers in KSA, giving them a direct, confidential channel to raise concerns with Amazon.

Post-Placement Measures to Support Workers

We understand that for a worker whose placement at an Amazon site comes to an end, the experience can feel unsettling, regardless of the operational or contractual context, and we do not dismiss that perspective. However, Amnesty International's characterization of these operational workforce adjustments as "terminations" is inaccurate. Contracted workers are not automatically terminated when operational placements end; they remain employed by their 3P Vendor. Amazon takes seriously our responsibility to operate ethically within the KSA labor system and to ensure that we require our 3P Vendors to do the following when a contracted worker's placement at Amazon ends: (i) pay all outstanding wages and end-of-service entitlements through applicable wage protection mechanisms, (ii) explore onward placement for that worker before initiating final exit, and (iii) cover repatriation costs if onward placement is not feasible. Our responsible disengagement efforts have included supporting the repatriation of 84 workers, facilitating recruitment fee reimbursement to former contracted workers, and supporting contracted workers' onward placement with alternative workplaces so they could remain in paid employment. Amazon has also embedded the requirement to provide "No Objection Certificates" (NOCs) in our contracts with 3P Vendors in KSA. Employers must facilitate the transfer of workers to new employers and not impede workers who wish to exit the country.

We are clear-eyed that contractual requirements alone do not guarantee outcomes for every worker, but once a 3P Vendor deploys a contracted worker to a new workplace after Amazon, we have limited means to monitor or evaluate their workplace conditions, unless a worker uses our global complaints mechanism. Within our sphere of influence, we take concrete action, and we're committed to continuing that work. A migrant worker's journey within KSA's labor system, however, involves dimensions that sit beyond corporate control and within government regulatory frameworks. What we can do and are doing is setting expectations, acting when they are not met, and continuing to invest in the monitoring and accountability mechanisms that close the gap between what contracts require and what workers experience.

Migrant Worker Mobility and Freedom of Movement

Amazon works to support contracted workers' freedom of movement and mobility. For example:

- Our Standards prohibit passport withholding and forbid unreasonable restrictions on workers' freedom of movement in any supplier-controlled facility like housing.
- Our audit program assesses 3P Vendor conformance with these requirements through document review, site inspections, management interviews, and confidential worker interviews.
- Workers can report any restrictions on their movement or access to documents through our grievance mechanisms at any time, and we engage with 3P Vendors when relevant concerns are raised.

- We require 3P Vendors to maintain valid documentation for all workers and to process exit and re-entry requests in a timely manner.
- We monitor wage payments during contracted workers' placement at Amazon to confirm that 3P Vendors are providing timely, transparent compensation.

Amnesty International's inquiry about why Amazon's Standards do not cover KSA's official exit and re-entry procedures conflates Amazon's corporate due diligence with government regulatory authority. Amazon's Supply Chain Standards are global and applicable across every jurisdiction in which we operate. The exit and re-entry procedures in KSA are determined by the government, not Amazon or its suppliers. However, we recognize the potential risks these procedures may present to migrant workers, which is why we have included specific requirements for our 3P Vendors to maintain valid documentation for all workers and process exit and re-entry requests timely. Where workers within Amazon's supply chain have escalated such concerns to us, multiple teams work to address them.

Amazon Vendor Risk Management and Audit Program in KSA

Amazon has assessed the risks associated with our operations in KSA and uses those assessments on a continuous basis to directly shape how we operate in the country. We have identified areas requiring focused investment, including recruitment practices, employer-provided housing, worker access to information and grievance channels, oversight of 3P Vendor conformance with our Standards, and support for contracted workers after their placement with Amazon ends.

Our response is a program that addresses issues workers may face at any point in the lifecycle of their work in Amazon's supply chain. This may begin prior to departure from their home country, throughout their placement at Amazon, and until the point when they leave our supply chain, as appropriate. The programs described above – the IOM partnership, ethical recruitment efforts, social audit infrastructure, publicly available grievance mechanisms, and our remediation efforts – are the direct outcomes of our assessment program. Central to this work is our audit program.

Audit Coverage and Enforcement

In KSA, our audit program covers all active 3P Vendors.

- Our audit process includes site inspections, confidential worker interviews, and reviews of site documents and licenses.
- Audits assess indicators including adequate communication of employment terms, improper document retention, restrictions on worker movement, and any worker-paid recruitment fees.
- When findings require deeper investigation, we engage Amazon teams or third-party experts for additional assessments.
- Where non-conformances are identified, 3P Vendors are required to complete corrective action plans with defined timelines, and Amazon monitors progress through verification.
- Where 3P Vendors have failed to remediate after sustained engagement, Amazon has terminated multiple vendor relationships as a last resort and undertaken responsible disengagement efforts to support affected workers during the transition.

3P Vendor Workforce in KSA

Amazon works with fewer than 10 licensed 3P Vendors in KSA. Collectively, our 3P Vendors' employees staffed to Amazon in KSA number in the low thousands and are composed predominantly of foreign

nationals, consistent with labor patterns in the region. The size and composition of this workforce fluctuate based on operational needs, and we regularly evaluate our vendor relationships to confirm vendors meet our Standards. Our programs aimed at supporting contracted workers, including our audit program, grievance mechanisms, ethical recruitment measures, and remediation processes, operate without regard to nationality. All workers at our sites are held to the same standards regardless of their employment arrangement.

Worker Grievance Mechanisms

Amazon's grievance mechanisms include a globally accessible complaints webform available in 19 languages that supports anonymous submissions. Amazon has received and acted on worker complaints through these channels, including taking steps to remediate the concerns raised. Outcomes have included facilitation of over $2.45 million in recruitment fee reimbursements and taking action against vendors, where warranted, including pausing purchasing, not renewing contracts, and terminating non-conformant vendor relationships. We continue to invest in worker access and trust in these mechanisms, including through outreach and education for contracted workers.

Amnesty International implies that grievance mechanisms are insufficient. We agree, which is why we do more than rely on grievance mechanisms. We combine all the efforts outlined above, coupled *with* grievance mechanisms, to produce tangible outcomes for workers.

Commitment to Continued Engagement

The challenge of protecting migrant workers in complex labor environments is ongoing and requires continuous investment, effective partnerships, honest assessments of what is and is not working, and appropriate action when our Standards are not met. We have made progress and will continue to focus on improving our approach and execution every day. We remain committed to engaging constructively with Amnesty International and welcome the opportunity to meet with Amnesty International's regional director to discuss these issues.

AMNESTY INTERNATIONAL IS A GLOBAL MOVEMENT FOR HUMAN RIGHTS. WHEN INJUSTICE HAPPENS TO ONE PERSON, IT MATTERS TO US ALL.

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AMAZON IN SAUDI ARABIA

WHY MIGRANT WORKERS REMAIN AT RISK OF EXPLOITATION

Three years after Amnesty International documented serious exploitation of migrant workers contracted by labour supply companies to work in Amazon's warehouses in Saudi Arabia, this briefing assesses whether conditions have improved.

It finds that while Amazon has taken steps to reimburse illegal recruitment fees and ensure better recruitment practices and accommodation standards, workers remain exposed to ongoing insecurity and abuse due to the company's continued reliance on third-party labour suppliers within the context of the kafala system.

The briefing calls on Amazon to move away from this outsourced employment model and on Saudi Arabia to effectively dismantle the kafala system in practice.

INDEX: MDE 23/1544/2026
NOVEMBER 2026
LANGUAGE: ENGLISH

amnesty.org

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