

## Assess Alignment of Lobbying with Company's Climate Goals

**RESOLVED:** Shareholders of Amazon.com Inc. ("Amazon") request that the Board report to shareholders (at reasonable cost, omitting confidential/proprietary information) on its framework for identifying and addressing misalignments between Amazon's lobbying and policy influence activities and positions, both direct and indirect through trade associations, coalitions, alliances, and social welfare organizations ("Associations"), and its Net Zero (emissions) climate commitments, including the criteria used to assess alignment, the escalation strategies used to address misalignments, and the circumstances under which escalation strategies are used (e.g., timeline, sequencing, degree of influence over an Association).

### SUPPORTING STATEMENT

Critical gaps persist between national climate commitments and the actions necessary to meet them. A 2022 global assessment makes it clear that nations are not doing enough to limit global warming to 1.5 degrees Celsius<sup>1</sup> and that this goal is now almost entirely out of reach unless immediate and dramatic changes are implemented.<sup>2</sup>

Voluntary initiatives are insufficient to meet the Paris Agreement's goals without robust climate public policy. Major companies have enormous influence and bipartisan credibility to help establish a policy environment that will avert the most dire climate consequences and take advantage of the opportunity of this generational economic shift. Corporate lobbying that is inconsistent with the Paris Agreement poses significant escalating risks to companies and investors. Investors need clear information on how companies' direct and indirect policy advocacy efforts align with their own climate targets, as companies may tout their climate efforts but often fail to account for their support for organizations and initiatives that work to block critical climate policies.

Amazon notes that its lobbying and advocacy activities are "aligned with the Paris Agreement goals"<sup>3</sup> and that it "advocate[s] in support of public policy that advances... access to and the expansion of clean energy, sustainable transportation, and other decarbonizing solutions."<sup>4</sup> But Amazon also acknowledges that its "membership in certain organizations may... be viewed as indirectly funding positions that are inconsistent with [its] views on climate change and the Paris Agreement goals."<sup>5</sup>

Amazon reports considering the reputational risks of potential misalignment between its policy positions and those of third parties representing it, but claims that the benefits of such memberships may outweigh the risks,<sup>6</sup> without analyzing the trade-offs. Amazon says that it communicates with third parties representing it when the company disagrees with their climate policy positions,<sup>7</sup> but insufficient detail is provided to allow investors to evaluate the robustness of Amazon's responses.

Additionally, Amazon's trade association and other memberships<sup>8</sup> reveal inconsistencies with its actions on, and commitments to, its own Net Zero ambitions, including support for organizations consistently doubting the scientific consensus on climate change.<sup>9</sup>

While Amazon has publicly outlined examples of positive direct lobbying efforts aligned with the Paris Agreement, it has not disclosed the policy positions, actions, assessment framework, and escalation considerations needed for investors to properly analyze and address misaligned activities, and the consistency of aligned positions.

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<sup>1</sup> <https://unfccc.int/news/climate-plans-remain-insufficient-more-ambitious-action-needed-now>

<sup>2</sup> [www.nature.com/articles/s41586-022-04553-z](http://www.nature.com/articles/s41586-022-04553-z)

<sup>3</sup> [https://s2.q4cdn.com/299287126/files/doc\\_downloads/2022/Note-on-Alignment-with-Paris-Agreement.pdf](https://s2.q4cdn.com/299287126/files/doc_downloads/2022/Note-on-Alignment-with-Paris-Agreement.pdf)

<sup>4</sup> Ibid.

<sup>5</sup> Ibid.

<sup>6</sup> [https://s2.q4cdn.com/299287126/files/doc\\_downloads/2022/Note-on-Alignment-with-Paris-Agreement.pdf](https://s2.q4cdn.com/299287126/files/doc_downloads/2022/Note-on-Alignment-with-Paris-Agreement.pdf)

<sup>7</sup> Ibid.

<sup>8</sup> [https://s2.q4cdn.com/299287126/files/doc\\_downloads/2021/political\\_engagement/2021-Political-Engagement-Statement.pdf](https://s2.q4cdn.com/299287126/files/doc_downloads/2021/political_engagement/2021-Political-Engagement-Statement.pdf); and <https://lobbymap.org/influencer/California-Chamber-of-Commerce-5bd0824487d9cdacdc577e0af93089ed>

<sup>9</sup> [www.aei.org/articles/what-we-really-know-about-climate-change](http://www.aei.org/articles/what-we-really-know-about-climate-change)