

MEMORANDUM

To: Comment File (S7-10-22) – The Enhancement and Standardization of Climate-Related Disclosures for Investors

From: The Office of the Chair, U.S. Securities and Exchange Commission

Date: December 2, 2022

Re: Meeting with Amazon

On December 2, 2022, staff from the Office of the Chair and the Office of the Chief Accountant met with representatives of Amazon about the SEC’s proposal for the enhancement and standardization of climate-related disclosures for investors. During the meeting, the attendees discussed the following issues from Amazon’s comment letter:

- Scope 3 disclosures, data reliability issues, and Amazon’s recommendation for a more robust safe harbor;
- Internal carbon price disclosures;
- Amazon’s suggested changes to the S-X provisions of the proposal; and
- Timing of phasing in disclosure requirements.

Attendees:

- Teresa Christopher, Head of Climate, Sustainability, and Environmental Policy, Amazon
- Mark Hoffman, Vice President and Associate General Counsel, Corporate and Securities, Legal COO, Amazon
- Dianne Salesin, Senior Corporate Counsel, Securities, Amazon
- Charles Hernick, Head of ESG Policy, Amazon
- Diana Rodriguez, Principal, Sustainability Policy, AWS

SEC attendees:

- Mika Morse, Office of the Chair
- Larry Yusuf, Office of the Chief Accountant
- Erin Nelson, Office of the Chief Accountant
- Sarmad Makhdoom, Office of the Chief Accountant