PULL THE PLUG ON THE POLITICAL ECONOMY ENABLING ISRAEL'S CRIMES

WHAT STATES AND COMPANIES MUST DO TO STOP FUELING ISRAEL'S GENOCIDE, APARTHEID AND UNLAWFUL OCCUPATION

AMNESTY INTERNATIONAL

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1. INTRODUCTION

Amnesty International is calling on states, international, municipal and other public institutions and bodies ("public institutions"),[1] and companies and other private organizations ("companies"),[2] to step up their pressure on Israel to abide by its international obligations and put an end to the genocide of Palestinians in the Gaza Strip, the unlawful military occupation of the Occupied Palestinian Territory (OPT) and its system of apartheid against all Palestinians whose rights it controls. States, public institutions and companies must live up to their legal obligations and responsibilities under international law and standards, as laid out in a range of international decisions and resolutions. The public at large must demand that they do so.

The actions and commitments of everyone – states, public institutions, companies and the public – must match the gravity of the situation amidst a staggering loss of Palestinian lives, the irreparable damage caused to Palestinians, including through extreme dehumanization and continuous violations of international law with impunity, and repeated attacks against the universal values and international obligations that are the foundations of the global multilateral system.

In February 2022, Amnesty International published an investigation that detailed how massive seizures of Palestinian land and property, unlawful killings, forcible transfer, drastic movement restrictions, and the denial of the right to return, nationality and citizenship to Palestinians are all components of a system of apartheid under international law.[3] This system is maintained by violations which Amnesty International found to constitute apartheid as a crime against humanity, as defined in the Rome Statute of the International Criminal Court (ICC) and Apartheid Convention.

In January 2024, the International Court of Justice (ICJ) found that there was a real and imminent risk of irreparable harm to the rights of Palestinians in Gaza under the Genocide Convention and ordered Israel to take all measures within its power to prevent genocidal acts.[4] The ICJ also affirmed that all states have an obligation to prevent, suppress and punish genocide. The Court reiterated and expanded these provisional measures in two further orders in March and May 2024. Israel has failed to comply with these orders. In July 2024, the ICJ issued an advisory opinion declaring that Israel's occupation of the OPT is unlawful and that its discriminatory laws and policies against Palestinians in the OPT violate the prohibition on racial segregation and apartheid.[5] In December 2024, Amnesty International found that Israel had been and was continuing to commit genocide against Palestinians in the occupied Gaza Strip, and there has been since then a growing consensus among experts throughout the international community that genocide is occurring.[6]

In December 2024, the UN General Assembly passed a resolution that called for the "withdrawal of Israel from the Palestinian territory occupied since 1967, including East Jerusalem; the realization of the inalienable rights of the Palestinian people, primarily the right to self-determination and the right to their independent state;" and for states "[n]ot to render aid or assistance to illegal settlement activities, including not to provide Israel with any assistance to be used specifically in connection with settlements" in the OPT.[7] In September 2024, the UN General Assembly had passed a resolution where it set a 12-month timeline for Israel to withdraw from the OPT.[8]

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[1] By public institutions, Amnesty International is referring to the United Nations and its agencies, all international and regional bodies, all municipalities and their agencies, and any other public institution.

[2] Companies include private entities however organized such as funds, partnerships, universities, investors, charities, and non-governmental organizations.

[3] Amnesty International, Israel's apartheid against Palestinians: Cruel system of domination and crime against humanity (Index: MDE 15/5141/2022), 1 February 2022, https://www.amnesty.org/en/documents/mde15/5141/2022/en/

[4] International Court of Justice (ICJ), Application of the Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South Africa v. Israel), Summary 2024/1, Request for the Indication of Provisional Measures, order, 26 January 2024, https://www.icj-cij.org/node/203454

[5] ICJ, Legal Consequences arising from the Policies and Practices of Israel in the Occupied Palestinian Territory, including East Jerusalem, Summary 2024/8, 19 July 2024, https://www.icj-cij.org/case/186

[6] Amnesty International, 'You Feel Like You Are Subhuman': Israel's Genocide Against Palestinians in Gaza, (Index: MDE 15/8668/2024), 5 December 2024, https://www.amnesty.org/en/documents/mde15/8668/2024/en/

[7] UN General Assembly (UNGA), Resolution 79/81, Peaceful settlement of the question of Palestine, adopted on 3 December 2024, UN Doc A/RES/79/81, https://www.un.org/unispal/document/peaceful-settlement-of-the-question-of-palestine-general-assembly-resolution-a-res-79-81/

[8] Amnesty International, "Israel must implement UNGA resolution by ending its unlawful occupation of Palestinian Territory", 18 September 2024, https://www.amnesty.org/en/latest/news/2024/09/israel-must-implement-unga-resolution-by-ending-its-unlawful-occupation-of-palestinian-territory/

Yet, while the public opinion has been consistently and vocally demanding an end to Israel's violations of Palestinians' rights, to date states, public institutions and companies have failed to act on these decisions and their obligations and responsibilities under international law and standards.

2. INCREASED PRESSURE MUST BE PLACED ON ISRAEL

The economic, diplomatic and political support of these actors allows Israel to continue its unlawful occupation and system of apartheid, as well as the genocide of Palestinians in Gaza. Amnesty International sets forth below the actions the organization considers states, public organizations and companies must take to fulfil their responsibilities and obligations under international law. The calls directed to companies apply to the multitude of private institutions and entities currently contributing to or that have operations, products or services directly linked to Israel's unlawful occupation, and its crimes under international law, including apartheid and genocide.

This briefing also provides examples of 15 companies for which Amnesty International has gathered credible evidence regarding their contribution to Israel's unlawful actions.

These examples are based on Amnesty International primary research, companies' published human rights policies, corporate press releases, transcripts of investor calls, quarterly earnings statements, company promotional material and/or media sources, including statements made by company representatives to the media.

Amnesty International has documented the abuses by several of these companies for years and wrote to all companies named, asking questions about their activities in Israel and the OPT, as well as expressing concerns of the human rights violations described in this briefing before making them public. Eleven out of the 15 companies were contacted at different times from 2017 to 2024 about their activities described in this briefing and asked to provide a response. In 2025, thirteen out of 15 companies were contacted by Amnesty International and five companies sent replies, which are reflected in this briefing and previously published research that is cited; two replies are annexed in their entirety to this document.[9]

The list is illustrative, non-exhaustive and preliminary. Nevertheless, the range of industries and sizes of companies included in this document highlights the scale and scope of the role of economic actors that enable and sustain Israel's unlawful occupation and its crimes under international law, including apartheid and genocide.

Amnesty is calling on states and public institutions to end their self-imposed inertia and stop all support for Israel's violations of international law. They must immediately, whether independently or collectively, suspend all activities that contribute or are directly linked to Israel's unlawful occupation, its system of apartheid against all Palestinians whose rights it controls or the genocide against Palestinians in Gaza. Otherwise, they risk complicity in the crime against humanity of apartheid, genocide, and other crimes under international law.

Companies must fulfil their human rights responsibilities and ensure that they are not contributing to or have their operations, products or services directly linked to Israel's unlawful actions and that they are not responsible for causing human rights violations themselves. Companies and their employees and board members who do not take these measures risk incurring civil liability and criminal responsibility for aiding and abetting Israel's crimes under international law.

Civil society and the public at large should continue mobilizing and campaigning to demand that governments abide by their obligations and act to stop activities of companies, banks and other economic actors that contribute or that have operations, products or services directly linked to Israel's violations of international law.

[9] It is Amnesty International's interpretation that Booking.com and Elbit did not want their replies annexed verbatim, so therefore their replies are quoted and summarized but not replicated in their entirety.

2.1 THE SUPPLY TO ISRAEL OF ALL MILITARY AND SECURITY GOODS AND SERVICES MUST BE STOPPED

a) States must ban, with immediate effect, the direct and indirect supply, sale or transfer to Israel of all arms, military materiel, and security equipment, including related technologies, parts and components, technical assistance, training, financial or other assistance. This includes prohibiting the transit and transhipment of these goods through their jurisdictions (ports, airports, airspace or territory) bound for Israel.

b) States must ensure that companies operating within their jurisdiction comply with these bans.

c) Companies should cease the direct and indirect supply, sale or transfer to Israel of all arms, military materiel, and security equipment, including related technologies, parts and components, technical assistance, training, financial or other assistance.

d) With respect to arms companies that continue to sell these goods and services to Israel, either directly or indirectly, states, public institutions and companies must use their leverage, including responsibly divesting from these companies and ceasing purchases of military and security goods and services from these companies, to stop these sales to Israel.

   States and public institutions must ensure that such companies are barred from any activity that involves bringing its military and security goods and services to market, including but not limited to banning their participation in arms and security equipment fairs, government meetings, contracts, and participation in research grants and activities with public bodies related to military/security goods and services.

   These measures must remain in place until the arms companies can demonstrate that they are not contributing to Israel's unlawful occupation or its crimes under international law.

e) Civil society and the public at large should mobilize and campaign until the above is achieved.

Amnesty International has documented bombs and guidance kits manufactured by **The Boeing Company (Boeing)** being used in unlawful air strikes in the occupied Gaza Strip. In particular, Amnesty International has documented the use of Boeing-manufactured Joint Direct Attack Munitions (JDAMs) and GBU-39 Small Diameter Bombs (SDBs) by the Israeli military in a series of deadly air strikes that killed scores of Palestinian civilians across the Gaza Strip, including many in children.[10] In 2022, Boeing wrote that as the result of a reciprocal procurement partnership in October 2018 "Israel is expected to purchase US$10 billion worth of military products from Boeing in the next decade, and the new agreement means Boeing will now invest US$3.5 billion in new business in Israel".[11] On 29 April 2025, Amnesty International wrote a detailed letter to the CEO of Boeing outlining our concerns related to the company's ongoing supply of military/security goods and services to Israel, but at the time of writing had not received a reply.[12]

I. Amnesty is calling on Boeing to immediately suspend all sales and deliveries of arms, military materiel, and security equipment and related services to Israel.

II. Amnesty is calling on states, public institutions and companies to use their leverage, including by responsibly divesting from the company and ceasing purchases of arms, military materiel and security equipment and related services from the company, to stop further sales of these goods and services to Israel.

[10] Amnesty International, "Israel/OPT: US-made munitions killed 43 civilians in two documented Israeli air strikes in Gaza – new investigation", 5 December 2023, www.amnesty.org/en/latest/news/2023/12/israel-opt-us-made-munitions-killed-43-civilians-in-two-documented-israeli-air-strikes-in-gaza-new-investigation/; Amnesty International, "Israel/OPT: New evidence of unlawful Israeli attacks in Gaza causing mass civilian casualties amid real risk of genocide", 12 February 2024, www.amnesty.org/en/latest/news/2024/02/israel-opt-new-evidence-of-unlawful-israeli-attacks-in-gaza-causing-mass-civilian-casualties-amid-real-risk-of-genocide/

[11] Boeing Corporation, "Boeing in Israel", www.boeing.com/content/dam/boeing/boeingdotcom/company/key_orgs/boeing-global/pdf/israelbackgrounder.pdf

[12] Amnesty International, Letter to Boeing, 29 April 2025, on file.

III. States and public institutions must ensure that Boeing is barred from any activity that involves bringing its military/security goods and services to market, including but not limited to banning their participation in arms and security equipment fairs, government meetings, contracts, and participation in research grants and activities with public bodies related to military/security goods and services.

IV. These measures must remain in place until Boeing can demonstrate that it is not contributing to Israel's unlawful occupation or its crimes under international law.

V. Civil society and the public at large should mobilize and campaign until the above is achieved.

The Lockheed Martin Corporation (Lockheed Martin) supplies and services F-16s and the growing fleet of F-35 combat aircraft – the backbone of the Israeli Air Force which has been used extensively during the bombardment of the occupied Gaza Strip.[13] The company has said publicly that it "is proud of the significant role it has fulfilled in the security of the State of Israel" citing over US$6 billion worth of investments in the Israeli arms industry.[14] On 1 August 2025, Amnesty International wrote a detailed letter to the CEO of Lockheed Martin outlining its concerns related to the company's ongoing supply of military goods and services to Israel, but at the time of writing had not received a reply.[15]

I. Amnesty is calling on Lockheed Martin to immediately suspend all sales and deliveries of arms, military material, and security equipment and related services to Israel.

II. Amnesty is calling on states, public institutions and companies to use their leverage, including by responsibly divesting from the company and ceasing purchases of arms, military materiel, and security equipment and related services from the company, to stop further sales of these goods and services to Israel.

III. States and public institutions must ensure that Lockheed Martin is barred from any activity that involves bringing its military/security goods and services to market, including but not limited to banning its participation in arms and security equipment fairs, government meetings, contracts, and participation in research grants and activities with public bodies related to military/security goods and services.

IV. These measures must remain in place until Lockheed Martin can demonstrate that it is not contributing to Israel's unlawful occupation or its crimes under international law.

V. Civil society and the public at large should mobilize and campaign until the above is achieved.

[13] IDF, "Three New "Adir" (F-35i) Aircraft Landed Last Week (Thursday) at the Nevatim Airbase", 16 March 2025, www.idf.il/en/mini-sites/idf-press-releases-israel-at-war/march-25-pr/three-new-adir-f-35i-aircraft-landed-last-week-thursday-at-the-nevatim-airbase/ "Since the beginning of the war, the Adir squadron has accumulated over 15,000 operational flight hours and has participated in thousands of sorties across all arenas […] The Israeli Adir is the only F-35 in the world to have conducted operational strikes with an external weapons configuration, significantly increasing its strike capacity. The expansion of the Adir fleet represents a substantial enhancement to the tactical capabilities of the Israeli Air Force."

[14] Lockheed Martin Israel, Lockheed Martin in Israel (accessed on 10 September 2025), https://www.lockheedmartin.com/en-il/index.html; Lockheed Martin, "Moving Forward Together: Partnership is about securing Israel's national interests while strengthening it from within", https://www.lockheedmartin.com/en-il/who-we-are.html

[15] Amnesty International, Letter to Lockheed Martin, 1 August 2025, on file.

Elbit Systems, and the state-owned Rafael Advanced Defense Systems Ltd. (Rafael) and Israel Aerospace Industries Ltd. (IAI), are the three largest Israeli arms companies. They supply billions of dollars-worth of arms and security equipment and related services to the Israeli military annually. Some of those goods and services, such as surveillance and armed drones, loitering munitions, and border security systems contribute to maintaining Israel's illegal occupation in the OPT, and its crimes of apartheid against all Palestinians whose rights it controls and its genocide against Palestinians in the occupied Gaza Strip.[16] These companies have long been deeply integrated into Israeli military and security operations in the OPT and have publicly supported Israel's military actions in the occupied Gaza Strip and across the rest of the OPT for the last 23 months.[17] Amnesty wrote detailed letters to the CEOs of Elbit Systems, Rafael Advanced Defense Systems and IAI. At the time of writing, only Elbit Systems had replied. In the letter, Elbit Systems disputed Amnesty International's claims and argued that the company was operating lawfully, supplying "a sovereign, unsanctioned government, recognized by the international community", and that "there is no legal basis for restricting our sales".

I. Amnesty is calling on Elbit Systems, Rafael and IAI to immediately suspend all sales and deliveries of arms, military materiel, and security equipment and related services to Israel.

II. Amnesty is calling on states, public institutions and companies to use their leverage, including by responsibly divesting from the companies and ceasing purchases of arms, military materiel, security equipment and related services from the companies, to stop further sales of these goods and services to Israel.

III. States and public institutions must ensure that these companies are barred from any activity that involves bringing their military/security goods and services to market, including but not limited banning their participation in arms and security equipment fairs, government meetings, contracts, and participation in research grants and activities with public bodies related to military/security goods and services.

IV. These measures must remain in place until these companies can demonstrate that they are not contributing to Israel's unlawful occupation or its crimes under international law.

V. Civil society and the public at large should mobilize and campaign until the above is achieved.

2.2 THE SUPPLY TO ISRAEL OF ALL SURVEILLANCE AND CLOUD INFRASTRUCTURE USED TO SUPPORT SURVEILLANCE, SECURITY AND MILITARY ACTIVITY, MUST BE STOPPED

a) States must ban, with immediate effect, the direct and indirect supply, sale or transfer, including transit and transshipment, to Israel of all surveillance equipment, as well as any artificial intelligence (AI), cloud infrastructure and other information technology (IT) equipment, software and hardware, especially the materials and services used to support surveillance, policing, security or military activities by Israel. This includes all related technologies, parts and components, technical assistance, training, and financial or other assistance.

[16] For example, Elbit Systems, Investor Conference 2025, Elbit Products Operational Proven in "Swords Of Iron", www.elbitsystems.com/sites/default/files/2025-03/butzi_machlis.pdf, pp. 30-3; Rafael Advanced Defense Systems, X, 20 June 2025, https://x.com/RAFAELdefense/status/1936028165744296136, ""The State of Israel is in the midst of one of the most consequential military operations of the modern era. RAFAEL is proud to support our forces across all domains - air, land, and sea."; Israel Aerospace Industries, "IAI Publishes its Annual Financial Statements for 2024", 16 March 2025, www.iai.co.il/about/press-release/iai-publishes-its-annual-financial-statements-2024, "The security of the State of Israel, its people and its economy are instrumental to our endeavours, and we will continue to lead the development of highly advanced technological solutions needed for the future battlefield as we have always done."

[17] Jerusalem Post, "With these air, sea, land, space, cyber systems Israel will win the war: Israel Aerospace Industries CEO Boaz Levi talks about his organization's pivotal role in the war against Hamas", 26 October 2023, www.jpost.com/israel-news/article-769956; Rafael, ESG Report 2023-4, www.rafael.co.il/wp-content/uploads/2025/02/Refael_ENGLISH120225MINA_All_compressed.pdf, p.14, Rafael's technology and innovations "significantly contribute to enhancing the IDF and ensuring its military superiority and achievements in Israel's operations, including the "Iron Swords""; Elbit Systems, "Elbit Systems Reports Second Quarter 2025 Results", 13 August 2025, www.elbitsystems.com/news/elbit-systems-reports-second-quarter-2025-results, "Since the commencement of the "Swords of Iron" war, Elbit Systems has experienced a material increase in the demand for its products and solutions from the Israel Ministry of Defense (IMOD) compared to the demand levels prior to the war."

b) States must ensure that companies operating within their jurisdiction comply with these bans.

c) Companies should cease the direct and indirect supply, sale or transfer of all surveillance equipment, as well as any AI, cloud infrastructure and other IT equipment, software and hardware used to support surveillance, policing, security or military activities by Israel. This includes all related technologies, parts and components, technical assistance, training and financial or other assistance.

d) Many surveillance, AI, and cloud infrastructure companies supply equipment and services to Israel related to its surveillance of the Palestinian population and its security and military activities within the OPT. States should investigate how these companies may contribute to or are directly linked to Israel's unlawful occupation, apartheid, genocide and other crimes under international law. If they are, states, public institutions and companies must use their leverage, including responsibly divesting and ceasing purchases of goods and services from these companies, to stop further sales to Israel.

e) These measures must remain in place until companies can demonstrate that their products are not contributing to or directly linked to Israel's unlawful occupation or its crimes under international law, including apartheid and genocide.

f) Civil society and the public at large should mobilize and campaign until the above is achieved.

As part of its ongoing research into surveillance companies, Amnesty has found that **Hikvision biometric surveillance products and services** are currently used in Israel's system of apartheid over Palestinians. In a research report, Amnesty International details how facial recognition technology is used extensively by the Israeli authorities to support their continued domination and oppression of Palestinians in the OPT.[18] With a record of discriminatory and inhuman acts that maintain a system of apartheid, the Israeli authorities are able to use facial recognition software – in particular at checkpoints – to consolidate existing practices of discriminatory policing, segregation, and curbing freedom of movement, violating Palestinians' basic rights. Amnesty International sent a detailed letter to Hikvision in February 2023 but has not received a response at the time of writing.

I. Amnesty calls on Hikvision to immediately suspend all sales and deliveries of biometric surveillance products and services to the Israeli government, whether these are direct or indirect sales.

II. Amnesty calls on all states, public institutions and companies to use their leverage, including by responsibly divesting and ceasing the purchase of goods and services from Hikvision, to stop further sales (direct or indirect) of Hikvision products and services to the Israeli government.

III. Amnesty calls on states and public institutions to ensure that Hikvision is barred from any activity that involves bringing their biometric surveillance materials and services to market, including but not limited to banning their participation in trade shows, such as fairs and exhibitions, government meetings, contracts, and participation in research grants and activities with public bodies with respect to biometric surveillance.

IV. These measures must remain in place until Hikvision can demonstrate that it is not contributing to Israel's unlawful occupation or its crimes under international law.

V. Civil society and the public at large should mobilize and campaign until the above is achieved.

[18] Amnesty International, Automated Apartheid: How facial recognition fragments, segregates and controls Palestinians in the OPT (Index: MDE 15/6701/2023), 2 May 2023, https://www.amnesty.org/en/documents/mde15/6701/2023/en/

Corsight, an Israeli tech company specialised in the development and sales of facial recognition software, was found to have been used by the Israeli military as part of its operations in Gaza. Amnesty has identified Corsight as the software provider whose facial recognition product powered Israel's surveillance operations in the Gaza Strip, with the company reportedly providing Israeli security forces with the technology from the start of the attack on the Gaza Strip. Amnesty International sent a detailed letter to Corsight outlining its concerns on 14 August 2025 but has not received a response at the time of writing.

I. Amnesty is calling on Corsight to immediately suspend all sales and deliveries of facial recognition software and related technology and services to the Israeli government.

II. Amnesty is calling on states, public institutions and companies to use their leverage, including by responsibly divesting from the company, and ceasing purchases from the company, to stop further sales and deployment of Corsight equipment and services in Israel.

III. States and public institutions must ensure that this company is barred from any activity that involves bringing its materials and services to their market, including but not limited to banning their participation in trade shows, such as arms fairs and exhibitions, government meetings, contracts, and participation in research grants and activities with public bodies.

IV. These measures must remain in place until the company can demonstrate that it is not contributing to Israel's apartheid, unlawful occupation or its crimes under international law.

V. Civil society and the public at large should mobilize and campaign until all of the above is obtained.

Palantir Technologies, a US software company, has been supplying AI products and services to the Israeli military and intelligence services and are linked to Israel's military activities in Gaza presently. On 12 January 2024, Palantir announced that they had been supplying Israeli authorities with new additional tools since October 2023.[19] The company announced a strategic partnership with the Israeli Defense Ministry that 'both parties have mutually agreed to harness Palantir's advanced technology in support of war-related missions.'[20] The partnership "aims to significantly aid the Israeli Ministry of Defense in addressing the current situation in Israel."[21] On 19 August 2025, Amnesty International wrote a detailed letter to Palantir Technologies outlining its concerns and their response is attached to this briefing.

I. Amnesty is calling on Palantir Technologies to immediately cease its operations with all aspects of the Israeli military, and to formulate public plans and commitments to ensure their products are not used to contribute to genocide, maintain apartheid or the illegal occupation at large

II. Amnesty is calling on all states, public institutions and companies to use their leverage from their investments, including by responsibly divesting from Palantir and ceasing the purchase of equipment and services from the company, to stop further sales of Palantir equipment and services to Israel.

III. States and public institutions must ensure that Palantir is barred from any activity that involves bringing their materials and services to their market, including but not limited to banning their participation in trade shows, such as fairs and exhibitions, government meetings, contracts, and participation in research grants and activities with public bodies.

IV. These measures must remain in place until the company can demonstrate that it is not contributing to Israel's apartheid, unlawful occupation or its crimes under international law.

V. Civil society and the public at large should mobilize and campaign until the above is achieved.

[19] Bloomberg, "Thiel's Palantir, Israeli Agree Strategic Partnership for Battle Tech", 12 January 2024, https://www.bloomberg.com/news/articles/2024-01-12/palantir-israel-agree-to-strategic-partnership-for-battle-tech
https://www.palantir.com/assets/xrfr7uokpv1b/3MuEeA8MLbLDAyxixTsile/9e4a11a7fb058554a8a1e3cd83e31c09/C134184_finaleprint.pdf; Business & Human Rights Resource Centre, "Palantir allegedly supplying Israel with AI tools amid Israel's war in Gaza", 10 January 2024, https://www.business-humanrights.org/en/latest-news/palantir-allegedly-supplying-israel-with-ai-tools-amid-israels-war-in-gaza/;
https://www.bloomberg.com/news/articles/2024-01-10/palantir-supplying-israel-with-new-tools-since-hamas-war-started?

[20] Bloomberg, ' Thiels Palantir, Israeli Agree Strategic Partnership for Battle Tech', 12 January 2024, https://www.palantir.com/assets/xrfr7uokpv1b/3MuEeA8MLbLDAyxixTsile/9e4a11a7fb058554a8a1e3cd83e31c09/C134184_finaleprint.pdf

[21] Bloomberg, ' Thiels Palantir, Israeli Agree Strategic Partnership for Battle Tech', 12 January 2024, https://www.palantir.com/assets/xrfr7uokpv1b/3MuEeA8MLbLDAyxixTsile/9e4a11a7fb058554a8a1e3cd83e31c09/C134184_finaleprint.pdf

2.3 ALL TRADE AND INVESTMENT CONTRIBUTING TO ISRAEL'S UNLAWFUL OCCUPATION, SYSTEM OF APARTHEID, OR GENOCIDE MUST BE BANNED

a) States must take steps to ban trade or investment relations that contribute to, or are directly linked to Israel's unlawful occupation, system of apartheid against all Palestinians whose rights it controls, the genocide against Palestinians in the Gaza Strip or other crimes under international law. These include:

1. States must pass or amend legislation and regulations, and/or implement existing legislation and regulations, with a view to preventing the provision of any kind of assistance, including through political, diplomatic, economic or other measure, to Israel's unlawful occupation, apartheid, or genocide.

2. States must take steps to prevent trade and investment that may aid or assist in the maintenance of, or contribute to, or be directly linked to, Israel's genocide, apartheid or unlawful occupation of the Palestinian territory, including through:

- banning trade with, and investment in, Israeli settlements
- banning trade with entities implicated in the establishment and maintenance of illegal settlements and their associated regime and other violations of international law in the OPT, and
- banning any type of assistance to the unlawful activities carried out by Israel in Israel, the OPT and beyond as part of its system of apartheid against all Palestinians whose rights it controls.

3. States must regulate companies domiciled in their jurisdiction in a manner to prevent these companies from contributing to or being directly linked to the unlawful occupation, including by prohibiting companies' operation in settlements or trade in Israeli settlements' goods, or with companies either domiciled in settlements or otherwise implicated in the development or sustainability of settlements in the OPT.

4. States must regulate companies domiciled in their jurisdiction in a manner to prevent these companies from contributing to or being directly to Israel's system of apartheid against all Palestinians whose rights it controls. This must include enhanced due diligence and sectorial monitoring, with related advisories, to prevent any form of support to Israel's apartheid policies and practices.

5. States must ban all exports that may be used by Israel or private enterprises, including charitable organizations and non-profits, operating within Israel and/or in the OPT, to entrench Israel's unlawful occupation, apartheid or genocide.

6. States must ensure that effective monitoring and accountability mechanisms are introduced and enforced, through domestic legislation and regulations, against private entities that maintain business relations with entities domiciled in Israeli settlements or otherwise implicated in the development or sustainability of illegal settlements in the OPT, and with entities contributing to Israel's apartheid.

b) States must investigate all companies within their jurisdiction listed in the UN Office of the High Commissioner for Human Rights (OHCHR) database of business enterprises involved in certain activities relating to settlements in the OPT, pursuant to Human Rights Council Resolutions 31/36 and 53/25.[22] States must take all reasonable measures to stop that activity, including responsible divestment, up to and including revoking a corporation's articles of incorporation in that state.

[22] (a) The supply of equipment and materials facilitating the construction and the expansion of settlements and the wall, and associated infrastructure;
(b) The supply of surveillance and identification equipment for settlements, the wall and checkpoints directly linked with settlements;
(c) The supply of equipment for the demolition of housing and property, the destruction of agricultural farms, greenhouses, olive groves and crops;
(d) The supply of security services, equipment and materials to enterprises operating in settlements;
(e) The provision of services and utilities supporting the maintenance and existence of settlements, including transport;

The OHCHR is updating this database in 2025, and the updated listings will be released in batches according to sectors. A listing on this database indicates that there are "'reasonable grounds to believe' that a business enterprise is involved in one or more of the listed activities where OHCHR has reviewed a reliable body of information, consistent with other material, on the basis of which a reasonable and ordinarily prudent person would have reason to believe that the business enterprise was involved in such activities."

c) States must investigate all companies in their jurisdiction identified in the report entitled "from economy of occupation to economy of genocide" of the UN Special Rapporteur on the situation of human rights in the Palestinian territories since 1967 (A/HRC/59/23) to determine whether they are contributing to or directly linked to Israel's unlawful occupation, apartheid, and/or genocide or other crimes under international law.

d) States must take all reasonable measures to stop any activity by these companies that contributes to or is directly linked to Israel's unlawful conduct, including responsible divestment and ceasing purchasing from these companies.

e) Amnesty calls on all states, public institutions, and companies to stop all purchasing from companies listed in the UN Database.

f) Civil society and the public at large should mobilize and campaign until all the above is obtained.

CAF (Construcciones y Auxiliar de Ferrocarriles) provides transportation materials and services to Israel for the Jerusalem Light Rail project, which connects illegal Israeli settlements in occupied East Jerusalem with each other, as well as with West Jerusalem Since 2019, CAF has played a key role in the expansion of the JRL, which has led to the growth of settlements in recent years, thereby contributing to the maintenance of Israel's illegal settlement enterprise, occupation, and annexation of East Jerusalem, The JLR services life in the settlements, facilitates settler movement, physical expansion of settlements and their economic sustainability and integrates these illegal entities into Israel, violating international law, including Article 49(6) of the Fourth Geneva Convention. Amnesty calls on CAF to immediately suspend its provision of goods and services to the Jerusalem Light Rail network which connects Israeli territory to settlements in the OPT and not apply for any other public contract that might contribute to Israel's illegal occupation of Palestinian territory.

I. Amnesty is calling on all states, public institutions and companies to use their leverage, including by responsibly divesting from, and ceasing procuring goods and services from, CAF to stop further provision of goods and services by CAF to the Jerusalem Light Rail network.

II. States and public institutions must ensure that CAF is barred from any activity that involves bringing their materials and services to their market, including but not limited to banning their participation in trade shows, such as fairs and exhibitions, government meetings, contracts, and participation in research grants and activities with public bodies relating to transportation materials and services.

III. These measures must remain in place until CAF can demonstrate that it is not contributing to Israel's apartheid, unlawful occupation or its crimes under international law.

IV. Civil society and the public at large should mobilize and campaign until all the above is obtained.

(f) Banking and financial operations helping to develop, expand or maintain settlements and their activities, including loans for housing and the development of businesses;

(g) The use of natural resources, in particular water and land, for business purposes;

(h) Pollution and the dumping of waste in or its transfer to Palestinian villages;

(i) Captivity of the Palestinian financial and economic markets, as well as practices that disadvantage Palestinian enterprises, including through restrictions on movement, administrative and legal constraints;

(j) Use of benefits and reinvestments of enterprises owned totally or partially by settlers for developing, expanding and maintaining the settlements.

Mekorot is a water company owned by the Israeli government operating in the OPT. Structural, systematic discriminatory policies and practices related to access to water form a key pillar in maintaining apartheid and unlawful occupation. While restricting Palestinian access to water, for years, Israel has effectively developed its own water infrastructure and water network in the West Bank for the use of its own citizens in Israel and in the settlements – that are illegal under international law. Recent research indicates that only 36% of Palestinians in the West Bank have daily access to running water all year long, while settlements have continuous service.[23]

I. Amnesty calls on Mekorot to ensure that its activities in Israel and the OPT do not infringe on the rights of Palestinians and that it is not contributing to any crimes under international law, including Israel's unlawful occupation in the OPT, its apartheid system against all Palestinians whose rights it controls or genocide against Palestinians in the Gaza Strip.

II. Amnesty calls on States, public institutions and companies to use their leverage including by responsibly divesting and ceasing purchases of water distribution materials and services from Mekorot, until the company's products and services are no longer used by Israel to infringe the rights of Palestinians, entrench its unlawful occupation, or commit crimes under international law. In so doing states and other actors should ensure that their actions are consistent with their own respective human rights obligations and responsibilities by not adversely impacting everybody's right to water.

III. States and public institutions must in addition ensure that Mekorot is barred from any activity that involves bringing their materials and services to their market, including but not limited to banning their participation in trade shows such as fairs and exhibitions, governments meetings, contracts and participation in research grants and activities with public bodies relating to water distribution and water supply.

IV. These measures must remain in place until Mekorot can demonstrate that it is not causing, contributing to international crimes in Israel and the OPT.

V. Civil society and the public at large should mobilize and campaign until all of the above is obtained.

HD Hyundai produces heavy machinery that has been widely used in demolitions of Palestinian-owned structures, homes, and businesses in the OPT between 2018 and 2025. These demolitions occurred in the occupied West Bank, including in a southern area known as Masafer Yatta where Palestinians live under imminent threat of mass expulsion. These demolitions have resulted in the forced displacement of hundreds of Palestinians from their homes and damaged the livelihoods of many others. The report concluded that the HD Hyundai Group has failed to take the necessary steps to prevent the use of its machinery in these abuses in accordance with its responsibility to respect human rights. Amnesty International Korea contacted the company in 2023, 2024 and 2025; the company's responses are reflected in published research. More specifically, HD Hyundai stated that it has added compliance terms to prohibit illegal sales, and provisions related to human rights protection in their standard contracts. It also believed that the equipment used in OPT is second-hand, and as the manufacturer, the use or intellectual property rights of second-hand products is outside their locus of control. Amnesty's request that they halt exports to Israel and send a fact-finding mission to OPT to retrieve the equipment was stated to be unreasonable.[24]

I. Amnesty calls on HD Hyundai to immediately suspend all supply of heavy machinery, parts, and related services in Israel and the OPT.

[23] B'Tselem, Parched: Israel's policy of water deprivation in the West Bank, April 2023, https://www.btselem.org/sites/default/files/publications/202305_parched_eng.pdf

[24] Amnesty International, "Israel/OPT: HD Hyundai must immediately ensure that its machinery is not linked to human rights abuses in the occupied Palestinian territory", 27 March 2025. https://amnesty.or.kr/132930/news/human-rights-news/israel-opt-hd-hyundai-must-immediately-ensure-that-its-machinery-is-not-linked-to-human-rights-abuses-in-the-occupied-palestinian-territory/ Amnesty International, "South Korea/Israel/OPT: HD Hyundai machinery used in West Bank demolitions", 27 March 2025, https://www.amnesty.org/en/latest/news/2025/03/south-korea-israel-opt-hd-hyundai-machinery-used-in-west-bank-demolitions/

II. Amnesty calls on all states, public institutions and companies to use their leverage, including by responsibly divesting from, and ceasing purchasing, leasing and otherwise procuring heavy machinery, parts and related services from, HD Hyundai to stop further sales of HD Hyundai demolition equipment and services in Israel.

III. States must in addition ensure that HD Hyundai is barred from any activity that involves bringing their demolition equipment and services to the market, including but not limited to banning their participation in trade shows, such as fairs and exhibitions, government meetings, contracts, and participation in research grants and activities with public bodies relating to the type of demolition equipment and similar services that is directly linked to human rights abuses in the OPT.

IV. These measures must remain in place until HD Hyundai can demonstrate that it is not contributing to Israel's international crimes, or violations of human rights and international humanitarian law resulting from home demolitions in the OPT.

V. Civil society and the public at large must mobilize and campaign until the above is achieved.

In 2019, Amnesty International published a report that exposed how the operations of online tourism companies such as **Airbnb, Booking.com, Expedia and TripAdvisor** contributed to the maintenance, development and expansion of Israeli settlements in the OPT, namely the West Bank including East Jerusalem, in violation of international law.[25] Amnesty called on these companies to responsibly disengage from doing business in Israeli settlements, but they continue to do so, contributing to violations of human rights and international law associated with Israel's unlawful settlement enterprise, its unlawful occupation, and its system of apartheid against Palestinians in the OPT. These companies were listed in the UN Database of business enterprises in relation to Occupied Palestinian Territory in 2020 and in light of their continued operations in the OPT could be relisted in the upcoming iteration of the database.

At the time of writing, only Airbnb and Booking.com had replied, both companies acknowledged the listings and stated that whilst they aim to uphold stringent human rights due diligence in context of OPT in alignment with the UN Guiding Principles on Business and Human Rights, ultimately bookings via their platforms were consumer decisions for which they were not singularly responsible. In their replies to Amnesty's enquiries the companies cited steps such as donating all profits from bookings in the West Bank, including from Israeli and Palestinian hosts, to an international non-profit (in the case of Airbnb) to a program that provides additional information about the potential implications of traveling to accommodation locations on relevant search results pages and labelling accommodations' locations, such that a property or listing located in an Israeli settlement is designated as being located in a "Palestinian Territory, Israeli Settlement" (in the case of Booking.com).

I. Amnesty calls on Airbnb, Booking.com, Expedia and TripAdvisor to immediately suspend all activities in Israeli illegal settlements in the OPT.

II. States must, through legislation and other means, ensure that companies such as these can provide services to Palestinians in the OPT and not to settlers illegally present in the OPT without being subject to legal claims of discrimination and other punitive measures.

III. Amnesty is calling on states, public institutions and companies to use their leverage, including by responsibly divesting from, and ceasing purchases of goods or services from, these companies until they cease their activities in the illegal Israeli settlements in the OPT and/or with individuals and entities implicated with illegal settlements.

IV. These measures must remain in place until these companies can demonstrate that they are not contributing to or directly linked to Israel's unlawful occupation and apartheid.

V. Civil society and the public at large must mobilize and campaign until the above is achieved.

[25] Amnesty International, Destination: Occupation: Digital tourism and Israel's illegal settlements in the Occupied Palestinian Territories (Index: MDE 15/9490/2019), 30 January 2019, https://www.amnesty.org/en/documents/mde15/9490/2019/en/

3. LEGAL OBLIGATIONS

In January 2024, the International Court of Justice (ICJ) found that there was a real and imminent risk of irreparable harm to the rights of Palestinians in Gaza under the Genocide Convention and ordered Israel to take all measures within its power to prevent genocidal acts. The Court reiterated its orders to Israel again in March and May 2024. The ICJ also affirmed that all states have an obligation to prevent, suppress and punish genocide. With regard to the obligation to prevent genocide, this means that all states have the responsibility to employ all means reasonably available to them, so as to prevent genocide so far as possible, particularly those states with the capacity to influence effectively the action of persons likely to commit, or already committing, genocide.

In September 2024, the UN General Assembly passed a resolution demanding that Israel end its unlawful presence in the OPT within 12 months, in compliance with the ICJ's July 2024 advisory opinion which declared that Israel's occupation of the Palestinian territory is unlawful and that its discriminatory laws and policies against Palestinians in the OPT violate the prohibition on racial segregation and apartheid.26

In December 2024, the General Assembly adopted another resolution that called for "the withdrawal of Israel from the Palestinian territory occupied since 1967, including East Jerusalem; the realization of the inalienable rights of the Palestinian people, primarily the right to self-determination and the right to their independent state;" and for States "[n]ot to render aid or assistance to illegal settlement activities, including not to provide Israel with any assistance to be used specifically in connection with settlements" in the Occupied Palestinian Territory.27

Under international law, all States have a responsibility to prevent and respond to the crime of apartheid. Apartheid is a violation of public international law, a serious human rights violation and a crime against humanity. The prohibition of apartheid is a rule of customary international law, amounts to a peremptory norm of international law (jus cogens), entailing obligations for all States (erga omnes). This means that all states are under an international obligation to take all possible measures to bring an end to apartheid where it exists. They are prohibited from supporting apartheid or providing assistance which could maintain apartheid. Possible measures include suspending direct and indirect supply, sale or transfer, including transit and transshipment of all weapons, munitions and other military and security equipment, including the provision of training and other military and security assistance. Other measures include banning trade and investments where these are contributing to maintaining apartheid.

Under Common Article 1 of the 1949 Geneva Conventions and customary international humanitarian law (IHL), states have an obligation to "ensure respect" for IHL. This entails that states have an obligation to take all available measures at their disposal to ensure that Israel, Hamas and other Palestinian armed groups fully comply with IHL. As the International Committee of the Red Cross has clarified, at a minimum, "Common Article 1 requires High Contracting Parties to refrain from transferring weapons if there is an expectation, based on facts or knowledge of past patterns, that such weapons would be used to violate the Conventions". Moreover, "[t]his obligation is not limited to stopping ongoing violations but includes an obligation to prevent violations when there is a foreseeable risk that they will be committed and to prevent further violations in case they have already occurred" (GC I Commentary, 2016, paras 162 and 164). With specific respect to Israel's violations of IHL in the Occupied Palestinian Territory, in its July 2024 advisory opinion the ICJ stated that "all the States parties to the Fourth Geneva Convention have the obligation, while respecting the Charter of the

[26] Amnesty International, "Israel must implement UNGA resolution by ending its unlawful occupation of Palestinian Territory", (previously cited), "ICJ opinion declaring Israel's occupation of Palestinian territories unlawful is historic vindication of Palestinians' rights", 19 July 2024, https://www.amnesty.org/en/latest/news/2024/07/icj-opinion-declaring-israels-occupation-of-palestinian-territories-unlawful-is-historic-vindication-of-palestinians-rights/

[27] UNGA, Resolution 79/81, (previously cited)

United Nations and international law, to ensure compliance by Israel with international humanitarian law as embodied in that Convention" (Para 279).

Article 6 of the Arms Trade Treaty prohibits transfers of arms where the state party has knowledge at the time of authorization that they would be used in the commission of genocide, crimes against humanity, or grave breaches of the Geneva Conventions of 1949. If the transfer is not prohibited under Article 6, Article 7 bars the export of arms where there is an overriding – meaning substantial – risk that they could be used to commit or facilitate a serious violation of international human rights or humanitarian law.

Under the UN Guiding Principles, companies have a responsibility to respect all internationally recognized human rights, as well as international humanitarian law, wherever they operate in the world. The responsibility to respect human rights requires companies to "avoid causing or contributing to adverse human rights impacts through their own activities and address such impacts when they occur." If a company identifies that it may cause or contribute to human rights abuses, and that it cannot prevent these abuses, the only possible course of action is not to undertake the relevant activity. Under the UN Guiding Principles, companies should also "enable the remediation of any adverse human rights impacts they cause or to which they contribute".

Companies operating in the Occupied Palestinian Territory must take account of the standards laid down in international humanitarian law in relation to the protection of people in occupied territory. This includes the prohibition of establishing settlements, as well as special provisions designed to protect the local population from abuse and their resources from being stolen or pillaged.

Direct attacks on civilians and civilian objects and indiscriminate attacks which kill or injure civilians, extensive appropriation and destruction of property not justified by military necessity and carried out unlawfully and wantonly, and the transfer or deportation of the population of the occupied territory, all amount to war crimes, and as Amnesty International has found, are being committed as part of Israel's genocide against Palestinians in Gaza. Conduct that could amount to aiding and abetting war crimes, apartheid, or genocide include participating in, assisting or encouraging the settling of civilians in occupied territory, the appropriation and destruction of land and property, aiding or assisting in unlawful attacks, aiding in the establishment or entrenchment of discriminatory housing, water, or other municipal systems, aiding in unlawful or discriminatory detention or surveillance systems, or otherwise enabling or exacerbating Israel's unlawful occupation and its commission of crimes under international law.

In many national jurisdictions, complicity in crimes under international law is a serious offence for which individuals, including business directors and managers, can be held criminally liable. Businesses carrying out activities that contribute to the maintenance, development and expansion of settlements, to Israel's system of apartheid, or its genocide in Gaza may expose themselves, or their individual directors and managers, to the risk of prosecution for complicity in war crimes.

4. ANNEXES

Airbnb response to Amnesty International – 29 August 2025

[redacted]

Amnesty International

August 29, 2025

Dear [redacted],

Thank you for your letter of August 15. We support efforts to build understanding between people everywhere, and hope that the day will come when all people in the region can live in safety, with security, and a lasting peace.

We work every day to meet our responsibilities to respect human rights, as outlined in the UN Guiding Principles on Business and Human Rights. Airbnb's human rights policy, which is overseen by a multidisciplinary group within the company, informs our operations globally, including in conflict-affected areas. Airbnb also takes our legal compliance obligations seriously, and, where applicable laws or sanctions prohibit Airbnb from operating in an area, we comply with those requirements.

In 2018, Airbnb introduced a global framework for listings in disputed territories. Under that framework, at that time, we announced our intention to remove certain listings in the West Bank. Airbnb was subject to legal action over that decision. Under the settlement terms of those lawsuits, Airbnb did not move forward with implementing the removal of listings in the West Bank from the platform. Instead, as announced in April 2019, Airbnb's policy is to donate all of its profits from bookings in the West Bank, including from Israeli and Palestinian hosts, to an international non-profit. This approach is outlined here.

In any given area, the volume of listings and bookings fluctuates over time, reflecting factors like availability, occupancy, and external events. In the West Bank, booking volumes remain very low. Between May 2024 and April 2025, our most recent donation period, around 80% of listings in the entire West Bank did not receive any bookings at all, and of those that did, many were with Palestinian hosts who use Airbnb to earn income and to connect with visitors.

Consistent with our global disputed territories framework, Airbnb has been donating its profits from bookings in the entire West Bank, as well as from two other territories, Abkhazia and South Ossetia. Over the past three years, while global travel has rebounded post-COVID, the annual number of bookings in these regions has consistently decreased. For the most recent donation period of May 2024 to April 2025, Airbnb's profits from these three territories amount to $16,681.

We remain committed to approaching this matter with care, and share in the hope of progress toward peace in the region.

[redacted]

[redacted]

[redacted]
Amnesty International

[redacted]

Dear [redacted]

We write in response to your 18 August letter, setting forth eight questions for Palantir Technologies Inc. ("Palantir") to respond to and requesting a response by 29 August (extended to 5 September) (ref TC AMR 51/2025.6932).

We appreciate the opportunity for Palantir to respond to your letter and stated concerns regarding Palantir's work in Israel, including your allegation that Palantir is contributing to human rights violations in the region and to the ongoing conflict between Israel and Hamas. As you know, Palantir is a globally engaged, multinational company that is committed to the preservation of human rights and conducts its business in compliance with all applicable local, national, and international laws. As such, we welcome good faith engagement and rigorous dialogue on our work and the pressing challenges facing the world today, and will attempt to respond to your questions, as we have with previous Amnesty International inquiries over the years.

Before going into depth on some of the points raised in your letter, we note with grave concern that it not only regurgitates unsubstantiated allegations that Palantir has previously responded to in detail and denied, but that it also fails to cite a plethora of publicly available resources that clarify our work in Israel [1], our work in defense [2], our longstanding company policy and prohibition on any workflows related to predictive policing [3], as well as other publicly available company materials that disprove many of the core allegations in your letter. [4][5] Your failure to refer, cite, or respond to this readily available material raises significant concerns about your agenda and the thoroughness of your analysis.

Nevertheless, in the interest of an open and rigorous dialogue, we have attempted to respond to the concerns in your letter. Given the range of questions and statements it makes, as well as the sweeping generalizations therein, it is not possible for us to account for every claim in a line-by-line manner. However, below we address its core points in the hope that our response clarifies many of the misconceptions and misrepresentations about the nature of our work as well as the inflammatory accusations that we are directly contributing to genocide, among other war crimes.

Palantir's Longstanding Support of Israel

Palantir has a longstanding presence in Israel. We have been vocal in our support of and solidarity with Israel in response to the barbaric attacks on October 7th, particularly in light of the horrific details of abuse and torture of Israeli civilians that day. Our work in Israel predates the terror attack, and is in line with our global support of US allies and liberal democracies.

As with many recent Amnesty publications on Israel and Gaza, we find it concerning that your inquiry bears no mention of the October 7th terror attacks, the genocidal intent reflected in the atrocities of that day, the hostages still being held in Gaza in violation of international law, or Hamas's continued war crimes directed at both the civilians of Gaza and Israel. Instead your letter frames, by omission or otherwise, the ongoing conflict as without justification under international law.

Core to your claims is a charge that any partnership with the Israeli military, regardless of context, and more widely operations within Israel, constitute a contribution to genocide, war crimes and apartheid. We disagree with this sweeping logic and find it detrimental to the need for nuanced discussion on this theme.

There are limitations on our ability to discuss our longstanding work in Israel, but it spans the government sector, including civil, defense, and intelligence-related mandates. Any expansion of our work in the country, including in defense contexts, would bring alongside it our approach that incorporates principles from international humanitarian law — including necessary civilian harm reduction — into our products. We embrace the complexity of the human rights landscape that this presents, particularly at a time of active hostilities, which is why we take a granular approach to our work and analyze potential impacts, including those on human rights, to ensure the opportunities we pursue align with our values while helping the organizations we support accomplish their critical missions. The law—be it national or international—requires nothing less.

Your Allegations Concerning Predictive Policing Workflows in Disputed Territories and Automated AI Targeting Systems in Gaza are Incorrect and Based on Discredited Reports

As an initial matter, accusations of contributing to war crimes and genocide are grave accusations that must be substantiated. Your letter does not do so. Rather, your accusations against Palantir are predominantly based on general statements about the use, whether actual or potential, of AI-driven products in conflict zones. For instance, your letter on pages 3 and 4 describes only *general* circumstances where the improper use of AI-driven products in conflict zones may violate human or privacy rights under International Humanitarian Law. The letter is devoid of any evidence that Palantir engages in such conduct. This is not surprising because Palantir does not engage in such conduct.

Your inquiry cites two purported examples of direct efforts where Palantir is contributing to war crimes in Gaza and Disputed Territories. However, both are wrong.

The first, based in your letter on Storebrand's public divestment from Palantir in November 2024, is the claim that Palantir is providing predictive policing capabilities for Israel to use in Disputed Territories, including Gaza. As we have refuted elsewhere, ***this is categorically untrue***. As a matter of company policy [6], Palantir does not build or facilitate predictive policing workflows, including in Israel and Disputed Territories. As we have now refuted this unsubstantiated allegation in writing multiple times, we trust this will be the end of the matter, and you will not recycle these unsubstantiated allegations in future correspondence or publications.

Second is the claim that Palantir is providing scaled targeting technology, including automated classification for targeted decisions, for Israel's use in the current conflict against Hamas. This is also untrue. This misrepresentation builds on recent unfounded claims that Palantir is the (or a) developer of the "Gospel" – the AI-assisted targeting software allegedly used by the Israeli Defense Ministry ("IDF") in Gaza, and that Palantir is involved with the "Lavender" database used by the IDF for targeting cross-referencing. ***These statements are not true.*** Both capabilities are independent of and pre-date Palantir's announced partnership [7] with the IDF. [8] We have no relationship to these programs and their use, but are proud to support Israeli defense and national security missions in other programs and contexts.

Finally, a core piece of evidence from your letter is the UN Special Rapporteur's report regarding Palantir, and many other companies, and their operations with respect to Israel. Palantir has elsewhere [9] addressed the false and misleading claims in the Special Rapporteur's report. We also find alarming that Ms. Albanese apparently entirely disregarded our letter of response [10] to her letter of inquiry for this report and has chosen not to further engage with Palantir. That you would uncritically parrot her mistaken assumptions without subjecting them to thorough vetting is also disappointing.

Conclusion

Palantir embraces the complexity of both our mission and that of our customers. Our core company thesis is centered around the idea of engaging with the world's most important institutions and problems, and we see our support of Israel, and indeed wider US allies and liberal democracies, to be central to upholding and enshrining the fundamental rights we hold most dear.

Further, we remain committed to good faith dialogue regarding our work and those with a sincere interest in learning what we do and why. That is why we are disappointed with the lack of due diligence represented in your inquiry, notably around its speculative nature and missing representation of the many materials we have made publicly available that could address its

core concerns.

Sincerely,

[redacted]
Palantir Technologies

[1] "Palantir response to allegations over its complicity in war crimes amid Israel's war in Gaza," Business & Human Rights Resource Centre, April 21, 2025, https://www.business-humanrights.org/en/latest-news/palantir-response-to-the-allegations-over-its-complicity-in-war-crimes-amid-israels-war-in-gaza/.

[2] "Safeguarding Freedom: How Defense Efforts Align with Human Rights," Palantir Blog, November 13, 2024, https://blog.palantir.com/safeguarding-freedom-87080c30a712.

[3] "About Palantir: Answers to Frequently Asked Questions About Palantir," Palantir Blog, August 21, 2025, https://blog.palantir.com/about-palantir-ddddb78aec29. See esp., "Does Palantir enable predictive policing? No. Palantir does not provide predictive policing tools, nor do we support any predictive policing workflows." https://www.business-humanrights.org/en/latest-news/palantir-response-to-the-allegations-over-its-complicity-in-war-crimes-amid-israels-war-in-gaza/

[4] "AI, Automation, and the Ethics of Modern Warfare (Defense AI Ethics, #1)," Palantir Blog, April 7, 2023, https://blog.palantir.com/ai-automation-and-the-ethics-of-modern-warfare-df1f0b212397.

[5] "Ethical AI in Defense Decision Support Systems (Defense AI Ethics, #2)," Palantir Blog, November 26, 2024, https://blog.palantir.com/ethical-ai-in-defense-decision-support-systems-e3d57505db4f.

[6] "About Palantir: Answers to Frequently Asked Questions About Palantir," Palantir Blog, August 21, 2025, https://blog.palantir.com/about-palantir-ddddb78aec29.

[7] Newman, Marissa, "Thiel's Palantir, Israel Agree Strategic Partnership for Battle Tech," Bloomberg, January 12, 2023, https://www.bloomberg.com/news/articles/2024-01-12/palantir-israel-agree-to-strategic-partnership-for-battle-tech.

[8] See, for example, direct statements from the IDF clarifying the origin, status, and application of these programs: "The IDF's Use of Data Technologies in Intelligence Processing," IDF Press Releases, June 18, 2024, https://www.idf.il/210062. Various media and academic sources have further corroborated similar clarifications, including: Serhan, Yasmeen, "How Israel Uses AI in Gaza—And What It Might Mean for the Future of Warfare," Time, December 18, 2024, https://time.com/7202584/gaza-ukraine-ai-warfare/; Schmitt, Michael N., "Israel – Hamas 2024 Symposium – The Gospel, Lavender, and the Law of Armed Conflict," Lieber Institute West Point, June 28, 2024, https://lieber.westpoint.edu/gospel-lavender-law-armed-conflict/; and Ahronheim, Anna, "Israel's operation against Hamas was the world's first AI war," The Jerusalem Post, May 27, 2021, https://www.jpost.com/arab-israeli-conflict/gaza-news/guardian-of-the-walls-the-first-ai-war-669371.

[9] "Palantir response to allegations over its complicity in war crimes amid Israel's war in Gaza," Business & Human Rights Resource Centre, April 21, 2025, https://www.business-humanrights.org/en/latest-news/palantir-response-to-the-allegations-over-its-complicity-in-war-crimes-amid-israels-war-in-gaza/.

[10] For your reference, we are providing the full letter sent to Ms. Albanese in reply to her inquiry. See appendix below.

Amnesty International is a movement of 10 million people which mobilizes the humanity in everyone and campaigns for change so we can all enjoy our human rights. Our vision is of a world where those in power keep their promises, respect international law and are held to account. We are independent of any government, political ideology, economic interest or religion and are funded mainly by our membership and individual donations. We believe that acting in solidarity and compassion with people everywhere can change our societies for the better.

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