



2020 Statement Against Modern Slavery

Google LLC (Google) and its subsidiaries and controlled entities—including Google UK Ltd., Google Australia Pty Ltd., Nest Labs, Inc. (Nest), Nest Labs (Europe) Ltd., Google Payment Ltd., and DeepMind Technologies Ltd.—are committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible ethical operations. As a part of our overall commitment to supporting human rights around the world, we stand against all forms of modern slavery, and we work to ensure it will not find a foothold in our supply chains and business operations

We are issuing this statement pursuant to the UK Modern Slavery Act, Australia Modern Slavery Act¹, and the California Transparency in Supply Chains Act, which require Google and certain of its subsidiaries to disclose efforts to ensure that modern slavery is not taking place in our supply chains and business operations. This is our fifth statement, covering our 2020 financial year (January 1 - December 31, 2020).

Google's subsidiaries and controlled entities currently participate in and are covered by the anti-modern slavery program operated by Google. As a result, statements regarding Google's efforts to ensure that modern slavery is not taking place in its supply chains and business operations—including statements regarding the company's policies, processes, and procedures—also apply to Google's subsidiaries and controlled entities unless specifically stated otherwise.

Throughout this statement, we reference “modern slavery,” which includes slavery, servitude, forced or compulsory labor, and human trafficking. In addition, we reference “extended workforce suppliers” and “our extended workforce,” which includes suppliers and supplier employees.

¹ For purposes of this Act, this statement is being made pursuant to section 14(1) of the Australia Modern Slavery Act 2018 by XXVI Holdings Inc., being the entity which ultimately owns Google LLC and all its subsidiaries, including Google Australia Pty Ltd. Google Australia Pty Ltd. is a reporting entity under this Act. This statement was prepared in consultation with Google Australia Pty Ltd.

2020 Highlights

■ Enterprise Modern Slavery Risk Assessment

We began an enterprise-wide modern slavery risk assessment that will conclude in 2021.

■ Targeted Desktop Audits

In addition to conducting our Supplier Code of Conduct on-site audits, we developed and launched a remote audit protocol, both of which enabled us to continue robust supply chain site assessments during the COVID-19 pandemic.

■ Supplier Responsibility

We published our [2020 Supplier Responsibility Report](#).

■ Charitable Giving

Google and Googlers (including corporate matching of employee donations, cash grants, and ad grants) contributed over US\$4.7 million in 2020 to organizations fighting modern slavery, including those on the [Global Modern Slavery list](#).

■ Global Business Coalition Against Trafficking (GBCAT) Modern Slavery Toolkit

.Google supported the development of the GBCAT toolkit on [Addressing Forced Labor and other Modern Slavery Risks](#).

Structure, business, and supply chain

Google is a wholly owned subsidiary of Alphabet Inc. (Alphabet). Google's business includes products and services such as ads, Android, Chrome, Google Cloud, Google Maps, Google Play, Search, and YouTube, as well as hardware products, such as Google Nest home products, Pixelbooks, Pixel phones, and other devices. Google generates revenues by delivering relevant, cost-effective online advertising; cloud-based solutions that provide customers with platforms, collaboration tools, and services; and sales of other products and services, such as apps and in-app purchases, digital content and subscriptions for digital content, and hardware.

Our business is supported by a significant amount of technical infrastructure, including data centers located in the U.S. and other countries. We also rely on other companies to manufacture many of our finished products, to design certain of our components and parts, and to participate in the distribution of our products and services. Our anti-modern-slavery efforts require strong collaboration and engagement with our global suppliers. As such, our philosophy is to work in partnership with all of our suppliers, empowering them to establish programs, policies, and practices that mitigate the risk of modern slavery occurring in their supply chains.

Internal management, accountability, and programs

In 2020, our Chief Compliance Officer, oversaw a team focused on combating modern slavery in our supply chains and business operations. Our Chief Compliance Officer provided quarterly updates on the status of our anti-modern-slavery program to our Compliance Steering Committee, composed of senior executives from across our business. In addition, our Chief Compliance Officer provided updates on relevant issues to the Audit and Compliance Committee of Alphabet's Board of Directors in accordance with its Charter, which was amended in 2020 to explicitly include risk oversight of human rights issues.

Regular updates on the status of the Supplier Responsibility Program—which includes addressing modern slavery risk—were provided to our Supplier Responsibility Steering Team in 2020, composed of our Chief Compliance Officer and leaders from our data center, hardware, and extended workforce business areas.

Policies addressing ethical conduct and prevention of modern slavery

As reported in our previous statements, we have an [Employee Code of Conduct](#) and a [Supplier Code of Conduct](#). Our Supplier Code of Conduct sets supplier expectations designed to protect the health, safety, and treatment of workers, including the prohibition of any form of modern slavery, including forced, bonded (including debt bondage), or indentured labor; involuntary prison labor; sex trafficking; and slavery or trafficking of people. In addition, our publicly posted [Policy Against Modern Slavery](#) further demonstrates our commitment to combating modern slavery. The policy defines modern slavery, gives a concrete list of prohibited actions, and provides reporting channels for suspected instances of modern slavery. We strive to hold our employees and suppliers to high standards. Any violation of our standards by a Google employee can result in disciplinary action, including termination of employment. Any violation by a supplier or extended worker can result in contract or engagement termination.

Risk assessment

Google continually assesses modern slavery risk in our supply chains. Our assessment processes identify higher-risk areas of our business based on external reports and standards, country and sector risk profiles, and input from experts in this area. In addition, to assess supplier-specific risk, we consider the industry, work type, geography, and supplier performance, among other factors.

In 2020, we hired an independent party to oversee an enterprise-wide modern slavery risk assessment, which aims to review Google against modern slavery indicators to help us understand potential gaps and opportunities for improvement, or identify new potential modern slavery risks that have emerged in our business operations and supply chains. We intend to complete the modern slavery risk assessment in 2021 with a report of findings and remediation plans to our Supplier Responsibility Steering Team and the Compliance Steering Committee.

In the meantime, we have continued our work in other higher-risk areas of our supply chain based on previous risk assessments, such as our hardware supply chain and our extended workforce. In 2020, our Supplier Responsibility Team and Extended Workforce supplier risk team continued to assess risks and work with our suppliers to remediate them amid the impacts of the COVID-19 pandemic.

We worked to address new labor and modern slavery risks posed by the pandemic, and made a [commitment](#) that we would continue to pay members of our extended workforce who were affected by reduced office schedules (such as closed cafes resulting from offices moving to work-from-home arrangements). In addition, to address gaps in sick leave requirements around the world, we [established](#) a COVID-19 fund that enabled all our temporary staff and vendors to take paid sick leave if they had potential symptoms of COVID-19 or could not come into work because they were quarantined.

For more information on our ongoing risk assessments and remediations in our hardware supply chain, please refer to [Google's 2020 Supplier Responsibility Report](#).

Due diligence

We conduct due diligence on direct suppliers that are identified as having higher risk through the assessments described in the preceding section (collectively, the "higher-risk suppliers").

As part of the due diligence process, higher-risk suppliers complete a self-assessment questionnaire about their working conditions and management systems. The due diligence process also includes supplier background checks, examination of labor-related red flags that appear in publicly available databases and media sources, and a review of higher-risk suppliers' names against human trafficking watch lists.

If we discover red flags, we conduct extensive and documented follow-ups to address these issues. In certain cases, we may decide to no longer pursue a relationship or to terminate our current relationship with a supplier.

Training

Training on our Code of Conduct reinforces the expectation that our employees, extended workforce, and contractors (collectively, "workers") follow applicable laws and report concerns of illegal or unethical activity. We train workers to conduct due diligence to identify and avoid working with third parties that engage in modern slavery or other illegal practices. Workers who manage relationships with higher-risk suppliers receive supplemental in-person training. In addition, we have an online training course on our Supplier Code of Conduct and Supplier Responsibility Program that includes anti-modern slavery education for workers in roles related to hardware supplier management. This training helps workers identify modern slavery red flags, shares anti-modern slavery best practices, and instructs workers to report modern slavery concerns.

Assessing and reporting on effectiveness

We perform periodic independent third-party audits at higher-risk suppliers' facilities. The audits include in-depth facility review, meetings with management, on-site worker interviews, document reviews, and assessments of related areas, such as dormitories, cafeterias, wastewater treatment facilities, and warehouses. The audit protocol is designed to assess suppliers' performance in the areas covered by our Supplier Code of Conduct, including modern slavery risk.

We investigate any issues identified during the audit and when we find that a supplier is not conforming to our expectations, we expect the supplier to provide a corrective action plan that outlines the root cause of the finding, how and when that company will resolve the issue, and what steps will be taken to prevent recurrence. We determine whether the plan is acceptable based on the severity of the nonconformance. Lastly, we monitor and verify all corrective actions are completed in the agreed upon time frame, with a process for escalation to the Supplier Responsibility Steering Team if necessary.

In 2020, our audit team developed and launched a remote audit protocol we call "Targeted Desktop Audits" to continue their work during COVID-19 pandemic travel limitations. These remote audits, in addition to our Supplier Code of Conduct on-site audits mentioned above, enabled us to continue robust supply chain site assessments. The development of the remote audit protocol included the creation of an in-depth methodology, assessor guide, and document review protocol. We also trained our independent auditors and worked closely with certain of our suppliers on the new process.

In addition to our formal announced audits, our supplier managers are trained to report any concerns they might observe on an ongoing basis. In 2020, we published our fourth annual [Supplier Responsibility Report](#) which provides more detailed information about our above-mentioned audit and supplier engagement efforts.

In 2020, our audits identified multiple findings related to the category "Freely Chosen Employment," including:

- Excessive employment termination notification requirements
- Monetary penalties for early termination of employment
- Inadequate or missing policies or practices related to repatriation of foreign migrant workers

In addition, our audits identified multiple findings related to the category "Working Hours and Wages," including:

- Workers working more than 60 hours a week
- Workers not receiving at least one day off every seven days
- Wages paid to workers that don't comply with all applicable wage laws
- Insufficient overtime compensation
- Insufficient social insurance coverage
- Deductions and withholding of wages as a disciplinary measure

As part of our audit program, we ask suppliers to identify root causes of any findings and develop and implement appropriate corrective actions; for the findings above, we are working with our suppliers to restrict prohibited fees, make timely reimbursements, change employment letter templates, remove inappropriate termination notification requirements, have policies in place to manage their (and their supply chains') adherence to our Supplier Code of Conduct, address root causes for worker shortages, provide all legally mandated benefits, and prohibit illegal wage deductions and withholdings as a disciplinary measure.

We also perform periodic third-party audits during office fit-out construction projects in some regions. With these audits, we strive to ensure that construction workers have a safe working and living environment (in those cases where housing is provided for workers) and are paid their wages in a timely fashion commensurate to the work performed. This is achieved by announced and unannounced visits to relevant facilities, interviews with workers, and inspection of personnel files. Appointed general contractors are contractually bound to allow similar audits of their subcontractors, as appropriate.

Because we recognize the limitations of audits in many areas, we have ongoing efforts to improve our protocols and to identify and assess risk using a variety of other methods and indicators. We also engage with workers through individual and group interviews, as well as device-based worker surveys.

In addition to our audits and corrective action plans with suppliers, we work to assess the overall effectiveness of the numerous different components in our modern slavery compliance program. The Anti-Modern Slavery lead meets regularly with the Supplier Responsibility lead and extended workforce supplier risk team to discuss and review the day-to-day operations of our supplier risk assessments, due diligence process, and audit program. These regular meetings lead to in-depth reviews and discussions regarding potential policy and process improvements. In 2020, we held formal reviews of the efforts undertaken by the Supplier Responsibility and extended workforce teams to ensure compliance to our Supplier Code of Conduct, including measures to address modern slavery risks.

Reporting concerns or raising issues related to modern slavery

We offer multiple reporting options to workers, including a helpline that gives workers an option to report concerns anonymously. We promote these reporting options through our internal policies, communications, and trainings. We also have a policy prohibiting retaliation for raising concerns.

If a modern slavery concern is raised through the helpline or other reporting channels, our Office of Compliance and Integrity coordinates with appropriate stakeholders to investigate and address the issue. If a reported concern is substantiated, the corrective response may involve working with the supplier to ensure that the issue is addressed or, if that is not possible, terminating the supplier.

Our commitment to ending modern slavery

In addition to the measures described above, we support a number of other efforts and organizations as part of our commitment to eradicating modern slavery.

Related policies

- **Advertising:** Our advertising policies do not allow ads containing adult-oriented content that targets minors, ads promoting sexually explicit content, including content with underage or non-consensual sexual themes, ads for compensated sexual acts, or ads that violate applicable laws or regulations for any location that a campaign targets (collectively, “bad ads”). We enforce our policies through a robust approval and monitoring process. We use the latest technology as well as manual review by teams that are specially trained to [remove bad ads](#)—and bad advertisers—from Google. This is a constant challenge, and we are always seeking ways to ensure our systems and practices stay ahead of the evolving risk.
- **Google Play:** Our policies do not allow apps that contain or promote sexually explicit content, such as pornography and escort services.

Product features

- **Search feature:** We continue to support a Search feature that helps victims of modern slavery to more easily access critical support and services from anti-modern-slavery organizations. Specifically, when certain keywords are used in Search, this feature will show hotline phone numbers, operating hours, and easy-to-use text short codes. The feature is available in 13 countries and 14 languages.
- **User engagement:** We provide robust tools to help our users report illegal content or abuse in our services, including community flagging tools. We also invite users to contact us with complaints about illegal content or abuse through our product Help Centers.

Partnerships

- **Protecting Children:** Google’s Special Victims Investigation Group investigates cases involving online child sexual exploitation, making reports to the National Center for Missing and Exploited Children (NCMEC). This initiative involves innovation in locating children being exploited to expedite their potential rescue.
- **UK Living Wage initiative:** The [Living Wage Foundation](#) is an initiative that annually calculates a minimum hourly living wage for the UK, generally, and in London, specifically. Google UK worked with the Living Wage Foundation to certify the steps it takes to ensure Google UK employees, suppliers, and vendors receive a living wage. Google UK is proud to have earned accreditation as a Living Wage employer for the fifth year in a row.
- **Responsible Mining:** Google is a member of the Responsible Minerals Initiative (RMI), which has a variety of programs addressing the risk of child mining. RMI [supports multiple collaborations with organizations](#) working to eradicate child labor and drive responsible mining practices in the Democratic Republic of the Congo (DRC). The effort involves working in-region with NGOs and governmental entities to assess the current state of child mining, identify root causes, develop mitigation plans, and support interventions that ultimately eliminate child mining by providing economic alternatives to families. This effort builds on previous work done by PACT in collaboration with Google and other companies in the DRC.
- **Industry Collaboration:** To support industry innovation and collaboration, we engage with the [BSR](#) Human Rights Working Group ([HRWG](#)), Global Business Coalition Against Human Trafficking ([GBCAT](#)), and the Responsible Business Alliance ([RBA](#)). In 2020, Google supported the development of the GBCAT toolkit on [Addressing Forced Labor and other Modern Slavery Risks](#). The toolkit aims to help businesses that work in corporate supply chains to quickly identify areas that carry the highest risk of modern slavery and develop a simple plan to prevent and address those risks. In 2021, we will begin using the toolkit to further engage suppliers on the issue of modern slavery and to support the development of modern slavery risk mitigation measures in our supply chain.

Employee Engagement and Awareness

- **Charitable giving:** Google and Googlers (including corporate matching of employee donations, cash grants, and ad grants) contributed over US\$4.7 million in 2020 to organizations fighting modern slavery, including those on the [Global Modern Slavery list](#).

Moving forward

Modern slavery remains a complex challenge, and we are continually working to evolve and improve our efforts to combat these practices.

This statement was reviewed by relevant internal teams and approved by XXVI Holdings Inc., a Delaware corporation and sole managing member of Google LLC¹.



Kent Walker

Secretary², XXVI Holdings Inc., sole managing member of Google LLC

Senior Vice President, Global Affairs, Chief Legal Officer, and Secretary, Google LLC

Signed in June 2021

1 This approval is provided pursuant to section 14(2)(d)(ii) of the Australia Modern Slavery Act 2018
2 In his capacity as Secretary of XXVI Holdings Inc., Mr. Walker is authorized to sign this statement