



2021 Statement Against Modern Slavery

1. Overview

Google LLC (Google) and its subsidiaries and controlled entities—including Google UK Ltd., Google Australia Pty Ltd., Fitbit (Australia) Pty Ltd., Fitbit Limited, Google Health UK Limited, 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 operating ethically. We stand against all forms of modern slavery and actively work to prevent it from taking place 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 sixth statement, covering our 2021 financial year (January 1 - December 31, 2021).

Google's anti-modern-slavery program covers Google, its subsidiaries, and its controlled entities. As a result, statements regarding Google's efforts to ensure that modern slavery is not taking place in our 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 specified otherwise.

For the purposes of this statement, "modern slavery," refers to slavery, servitude, forced or compulsory labor, and human trafficking. In addition, "supplier managers" refer to employees managing our suppliers, and "our extended workforce," refers to our supplier employees, temporary workers, and contractors.

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.

2021 Highlights

■ Modern Slavery Risk Assessment

We completed a risk assessment with [BSR](#), which identified areas of potential modern slavery risk within our business. We are working to prevent and mitigate the risks identified including by expanding our audit program to capture additional areas of potential risk and requesting additional information from our key suppliers on their efforts to manage modern slavery risk in their supply chains.

■ Modern Slavery and Forced Labor Training for Suppliers

We partnered with an independent third party to train some of our suppliers around the world on modern slavery and forced labor risks. The trainings covered indicators of modern slavery as well as topics such as responsible recruitment.

■ Modern Slavery Training for Supplier Managers

We developed and launched an additional online training course on our Supplier Code of Conduct for our extended workforce managers. The training includes guidance on modern slavery red flags, anti-modern-slavery best practices, and how to report modern slavery concerns.

■ Removing Problematic Listings on Google Maps

In partnership with our product teams and an independent third party, we developed search terms to identify listings on Maps that exhibit characteristics associated with human trafficking. We then worked to both remove and prevent those listings from being displayed to users.

■ Global Business Coalition Against Human Trafficking (GBCAT) Trauma-Informed Company Training

Google supported the development of [GBCAT's Trauma-Informed Company Training](#), a course designed for people managers at businesses that aim to employ survivors of human trafficking.

■ Charitable Giving

Google and Googlers (including corporate matching of employee donations, cash grants, and ad grants) contributed over US\$5.5 million in 2021 to organizations fighting modern slavery.

2. 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 Fitbit wearable devices, Google Nest home products, Pixel phones, and other devices. Google generates revenues by delivering relevant, cost-effective online advertising; cloud-based solutions that provide customers with infrastructure, platform services, and collaboration tools; sales of other products and services, such as apps and in-app purchases, digital content products, and hardware; and fees received from subscription-based products such as YouTube Premium and YouTube TV.

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 suppliers 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 from occurring in their supply chains.

3. Internal management, accountability, and programs

We have an Anti-Modern-Slavery team led by a dedicated global lead who manages our anti-modern-slavery program and provides subject matter expertise to our business. Our Chief Compliance Officer, who leads the Office of Compliance and Integrity (OCI), maintains oversight of the anti-modern-slavery program. In 2021, our Chief Compliance Officer provided quarterly updates on the status of the program to our Compliance Steering Committee, composed of senior executives from across our business. Our Chief Compliance Officer also provided relevant updates to the Audit and Compliance Committee of Alphabet's Board of Directors, which, in accordance with its Charter, has oversight of risks associated with, among other matters, human rights.

In 2021, our global Anti-Modern-Slavery lead and global Supplier Responsibility lead provided regular updates on the status of the Supplier Responsibility Program—which includes addressing modern slavery risk—to the Supplier Responsibility Steering Team, which comprises our Chief Compliance Officer and leaders from our data center, hardware, and extended workforce business areas.

In 2021, we established a Human Rights Executive Council, composed of senior leaders across relevant product areas and functions, which is led by our Chief Legal Officer. The Council provides oversight and guidance across our human rights programming, including modern slavery, and ensures issues are being addressed consistently.

4. 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. In addition, our publicly posted [Policy Against Modern Slavery](#) 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 an employee can result in disciplinary action, including termination of employment. Any violation by a supplier or member of our extended workforce can result in contract or engagement termination.

Contracts with suppliers include language requiring compliance with our Supplier Code of Conduct, which prohibits the use of any form of modern slavery. We also include more extensive anti-modern-slavery contractual language in some supplier contracts.

5. Risk assessment

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

In 2020-2021, we partnered with [BSR](#) to conduct a modern slavery risk assessment. The assessment identified areas of potential modern slavery risk within our business and provided strategies for risk mitigation and management. The assessment identified the highest risk activities as ones that rely heavily on outsourced or subcontracted labor (e.g., manufacturing, food services, janitorial services, and security providers). We are working to prevent and mitigate these risks, including by expanding our audit program to capture additional areas of potential risk and requesting additional information from our key suppliers on their efforts to manage modern slavery risk in their supply chains. The assessment findings were presented to both the Supplier Responsibility Steering Team and Compliance Steering Committee.

For more information on our ongoing risk assessments and remediations in our supply chain, please refer to our [2021 Supplier Responsibility Report](#).

6. Due diligence

We conduct due diligence on suppliers identified as having higher risk based on the assessments described in the preceding section (collectively, “higher-risk suppliers”). Our due diligence process is conducted at supplier onboarding and on a continuous basis; it involves assessing suppliers for social, environmental and ethical risks, including modern slavery risks. 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 and sanctions 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.

7. Training

In 2021, we partnered with an independent third party to train suppliers on modern slavery and forced labor risks. The trainings covered indicators of modern slavery and topics such as responsible recruitment. Over 100 individuals from over 52 different suppliers attended the training. Our post-survey results demonstrated that most attendees gained a better understanding of modern slavery risks and felt better equipped to establish internal processes to identify and prevent modern slavery within their operations.

Our employees and members of our extended workforce are trained on our Code of Conduct. The trainings cover topics such as how to conduct due diligence to identify and avoid working with third parties that engage in modern slavery or other illegal practices. Employees who manage relationships with higher-risk suppliers receive supplemental in-person training. In addition, employees in roles related to hardware supplier management complete an online training course on our Supplier Code of Conduct and Supplier Responsibility Program that includes anti-modern-slavery education. In 2021, we developed and launched an additional online training course on our Supplier Code of Conduct for our extended workforce managers. Both online trainings include guidance on modern slavery red flags, anti-modern-slavery best practices, and how to report modern slavery concerns.

8. Assessing and reporting on effectiveness

We assess the risk of modern slavery in our supply chains and the effectiveness of our compliance program through periodic independent third party on-site audits, remote audits, and engagement with our suppliers.

We work with an independent third party to conduct periodic audits of our higher-risk suppliers’ facilities. Our 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. Our 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 the company will resolve the issue, and what steps will be taken to prevent recurrence. We determine whether the plan is acceptable based on our Supplier Code of Conduct requirements. 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 addition, we conduct periodic third-party audits during office fit-out construction projects in some regions. Through 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 with 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. We also periodically conduct third-party on-site audits of strategic food services and janitorial suppliers, recognizing that workers in these industries are at higher risk for modern slavery.

Our audit team has continued to use Targeted Desktop Audits (TDAs), in response to COVID-19 pandemic travel limitations. These remote audits, in addition to our Supplier Code of Conduct on-site audits mentioned above, enable us to continue to conduct rigorous supply chain assessments. Our remote audit protocol includes an in-depth methodology, assessor guide, and document review protocol. We also trained our independent auditors and worked closely with select suppliers on the new process.

In 2021, we conducted 85 audits, which include on-site audits and TDAs. Our audits identified multiple findings related to the categories of “Freely Chosen Employment” and “Working Hours and Wages,” which contain key indicators related to the risk of modern slavery. These include the following:

Freely Chosen Employment

- excessive employment termination notification requirements for workers
- monetary penalties for early termination of employment
- inadequate or missing policies related to repatriation of foreign migrant workers
- worker-paid recruitment fees

Working Hours and Wages

- working hours in excess of 60 hours per week
- workers not receiving at least one day off for every seven days worked
- insufficient overtime compensation
- 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:

- reduce excessive termination notification requirements
- restrict prohibited fees and penalties
- make timely payments or reimbursements of wages and fees
- develop a policy on repatriation and provide repatriation support
- address root causes for worker shortages
- explicitly state that overtime is voluntary
- prohibit illegal wage deductions and withholdings as a disciplinary measure
- adopt procedures to manage their (and their supply chains’) adherence to our Supplier Code of Conduct

Audit findings and corrective actions are periodically presented to the Supplier Responsibility Steering Team for review and discussion. In addition to our formal announced audits, our supplier and extended workforce managers are trained to report any concerns they might observe on an ongoing basis, including on modern slavery risks.

As the most valuable insights often come from workers themselves, we engage with independent third parties to gather feedback through anonymous worker surveys and individual and group interviews. Workers are invited to share their concerns, including on topics such as working conditions, wages and benefits, working hours, and communication with management. In 2021, we heard from more than 4,500 members of our supplier workforce via our third-party audit process or our worker surveys.

We also assess the effectiveness of our actions through ongoing monitoring of suppliers whose audit findings reveal potential modern slavery risks, regularly reviewing and updating our supply chain implementation guidance, and developing tools to better identify populations at risk of modern slavery within our supply chain.

The Office of Compliance & Integrity exercises oversight over the Supplier Responsibility and Extended Workforce Solutions teams. Such oversight includes the collection of quarterly program performance and risk metrics, as well as reviews of supplier risk assessments, due diligence questions, and audit protocols that relate to modern slavery risk indicators. Any potential policy and process improvements to the Supplier Responsibility program are presented to the Supplier Responsibility Steering Team for approval. Once approved, the Supplier Responsibility team works with our suppliers to communicate our expectations and request evidence of adherence to our standards. Details about our audit findings are available in our [2021 Supplier Responsibility Report](#).

9. Reporting concerns or raising issues related to modern slavery

We offer multiple reporting options to our employees and members of our extended workforce, including a helpline that gives an option to report concerns anonymously, including on modern slavery. We promote this reporting channel 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 (e.g., our People Operations team), our Anti-Modern-Slavery team is notified and OCI coordinates with other 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.

10. Our commitment to supporting the eradication of modern slavery

In addition to the measures described above, we support a number of efforts and organizations as part of our commitment to supporting the eradication of 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
- **Google Play:** Our policies do not allow apps that contain or promote sexually explicit content, such as pornography and escort services. We also do not allow apps or app content that appear to promote a sexual act in exchange for

Product features

- **Google Search feature:** We continue to support a Google 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
- **Removing problematic listings on Google Maps:** In partnership with our product teams and an independent third party, we developed search terms to identify listings on Google Maps that exhibit characteristics associated with human trafficking. We then worked to both remove and prevent those listings from being displayed to users.

Partnerships

- **Protecting Children:** Google deploys technology for the detection of child sexual abuse material at scale. 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 be an accredited Living Wage employer.

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, a nonprofit international development organization, 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 \(HRWG\)](#), the Global Business Coalition Against Human Trafficking ([GBCAT](#)), and the Responsible Business Alliance ([RBA](#)). In 2021, Google supported the development of GBCAT's [Trauma-Informed Company Training](#), a course designed for people managers at businesses that aim to employ survivors of human trafficking. The training explains how trauma may manifest in the workplace and offers recommendations for managers to better support survivors of human trafficking.

Employee Engagement and Awareness

Charitable giving: Google and Googlers (including corporate matching of employee donations, cash grants, and ad grants) contributed over US\$5.5 million in 2021 to organizations fighting modern slavery.

11. Moving forward

We remain committed to improving our efforts to address modern slavery risks in our business and supply chains. In the next year, we plan to:

- Conduct online and in-person trainings on modern slavery for business units identified as having higher risk in our 2021 modern slavery risk assessment
- Continue to educate suppliers on modern slavery risks, including through the dissemination of GBCAT's [infographic and toolkit](#) on *Addressing Forced Labor and Other Modern Slavery Risks*
- Continue product-level risk assessments to better understand how our products may be associated with modern slavery risks

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
President, Global Affairs, Chief Legal Officer, and Secretary, Alphabet Inc. and Google LLC
Signed in June 2022

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.