



# 2016 Modern Slavery Statement

Google Inc. (Google) strives to ensure that working conditions in our operations and supply chains are safe, that all workers are treated with respect and dignity, and that our business operations are conducted ethically.

We are issuing this statement pursuant to the UK Modern Slavery Act, which requires Google to disclose its efforts to combat modern slavery in its supply chains and business operations. Throughout this statement we reference “modern slavery,” which includes slavery, servitude, forced or compulsory labor, and human trafficking.

## Structure, business, and supply chain

Google is a wholly owned subsidiary of Alphabet Inc. Google’s business includes our main Internet products, such as Search, Ads, Commerce, Maps, YouTube, Google Cloud, Android, Chrome, and Google Play, as well as hardware products we sell, such as Chromecast, Chromebooks, and Pixel devices. In addition, our business is supported by a significant amount of technical infrastructure, including data centers located in the U.S. and other countries. Google generates revenue primarily from advertising, sales of digital content, apps and cloud offerings for enterprise, and sales of hardware.

Google does not have manufacturing facilities. Because of this, our anti-modern slavery efforts require strong collaboration and engagement with suppliers that manufacture products on our behalf.

## Internal management, accountability, and programs

Our Chief Ethics and Compliance Officer oversees a team focused on combating modern slavery in the company’s supply chains and business operations. The Chief Ethics and Compliance Officer provides quarterly updates on the status of our Anti-Modern Slavery Program to our Compliance Steering Committee, composed of

senior executives from different areas within the business. In addition, our Chief Ethics and Compliance Officer provides regular updates on our anti-modern slavery efforts to the Audit Committee of Alphabet's Board of Directors.

Regular updates on the status of the Responsible Supply Chain Program—which includes addressing modern slavery risk—are provided to our Sustainable Supply Chains Steering Committee, composed of our Chief Ethics and Compliance Officer and leaders from the data center and hardware product areas.

## Policies addressing ethical conduct and prevention of modern slavery

Our [Code of Conduct](#) (the "Code") sets forth our expectations regarding compliance with anti-modern slavery legislation such as the UK Modern Slavery Act and the U.S. Federal Acquisitions Regulations Subpart 22.17—Combating Trafficking in Persons. The Code encourages employees to use our anonymous helpline to raise questions or concerns about the Code and to report suspected violations. Employees failing to follow the Code can be subject to disciplinary action, including termination of employment. Failure of a Google contractor, consultant, or other covered service provider to follow the Code can result in termination of their relationship with Google.

Our Human Trafficking and Child Labor Practices Policy prohibits knowingly engaging in or supporting human trafficking and child labor practices in our business operations. A Google employee, contractor, service provider, supplier, or vendor who knowingly engages in or otherwise takes action to support human trafficking or child labor practices will be disciplined up to and including termination of employment or business relationship.

Our commitment extends beyond our own employment practices to those of our suppliers. We developed a [Supplier Code of Conduct](#) (the "Supplier Code") for our product, research and development, and data center suppliers (collectively, "hardware suppliers"). Our Supplier Code is based on the Electronic Industry Citizenship Coalition Code of Conduct; international standards, such as the United Nations Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights; and our own values. Google seeks to have all of its direct hardware suppliers certify compliance with the Supplier Code either through direct signature of the Supplier Code or the inclusion of a certification clause in an executed contract. The Supplier Code sets standards designed to protect the health, safety, and treatment of workers, including the prohibition of any form of

forced, bonded (including debt bondage), or indentured labor; involuntary prison labor; sex trafficking; and slavery or trafficking of people.

## Risk assessment

We have been assessing risk associated with modern slavery since the beginning of our hardware supply chain business. The factors considered in these assessments are based on international standards described by the [Universal Declaration of Human Rights](#) and the [International Labour Organization](#) as well as industry standards. As a result, we created the Responsible Supply Chain team to address modern slavery risks, among other risks, in our hardware supply chain.

We recently conducted a Supplier Risk Assessment to identify additional modern slavery risks that may exist beyond our hardware supply chain. This assessment involved a review to 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. We then interviewed employees who hire suppliers in these higher-risk areas. As a result of the risk assessment, we identified our higher-risk areas of focus, which include call centers, construction, janitorial services, food services, and other manual labor-related jobs.

We plan to expand our risk assessment efforts to better understand modern slavery risks associated with the numerous layers of our different supply chains, including more detailed mapping and assessment of sector and geographic risks. In addition, we are engaging with external stakeholders and nonprofits to expand our knowledge.

## Due diligence and contracting

As part of our efforts to mitigate the risk of modern slavery in our supply chain, we conduct due diligence on our direct suppliers and vendors 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 comprehensive 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-up to remediate these issues. In certain cases, we may decide to no longer pursue a relationship or to terminate our current relationship with a supplier.

We are also in the process of reviewing our template contracts and adding language that requires suppliers to:

- comply with human trafficking, forced-labor, and modern slavery laws;
- implement anti-modern slavery due diligence processes for their own suppliers and business partners;
- extend similar anti-modern slavery language to their suppliers and business partners;
- allow audits for instances of modern slavery; and
- allow us to terminate our agreements with them for any violation of our obligations related to modern slavery eradication.

## Training

Training on our Code of Conduct reinforces the expectation that employees, temporary workers, and contractors (collectively, “our workers”) follow applicable laws and report concerns of illegal or unethical activity. Our workers who manage relationships with higher-risk suppliers identified in our risk assessment receive supplemental in-person training. In addition, in 2016, we also launched a new online training course that includes anti-modern slavery education for our workers in roles related to hardware supplier management. This training helps our workers identify modern slavery red flags, shares anti-modern slavery best practices, and instructs our workers to report modern slavery concerns.

In October 2016, we joined with industry partners to co-sponsor three forced-labor workshops for some of our suppliers in Malaysia, Taiwan, and Singapore. The multi-day workshops explored numerous topics aimed at eliminating forced and bonded labor in our supply chains.

## Assessing and reporting on effectiveness

We perform periodic third-party audits at higher-risk hardware and non-hardware suppliers’ facilities. The audits include in-depth factory tours, 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 higher-risk suppliers’ performance in the areas covered by our

Supplier Code, including modern slavery risk. We investigate any issues identified during the audit to determine root causes and develop corrective action plans. While our audits are announced, our supplier managers are trained to report any concerns they might observe on an ongoing basis.

Our audits have identified several findings related to the category ‘Freely Chosen Employment’, including:

- workers paying fees in their home country before leaving for jobs in other countries,
- document retention practices inconsistent with ensuring that workers maintain control of their identity documents, and
- reports from workers about inappropriate restrictions on breaks.

We believe we have been successful in addressing the findings regarding document retention practices and worker breaks. However, the findings of workers paying fees in their home country before leaving to work in other countries have proved to be more complex, particularly when those fees are a) legal under their home country’s laws and b) being charged by their home country’s government. We continue working to address this concern.

Because we recognize the limitations of audits in many areas, we are constantly working to improve our protocols and to assess risk using a variety of methods and indicators. We have also extended our direct engagement with workers through individual and group interviews as well as tablet-based worker surveys.

## Reporting concerns or raising issues related to modern slavery

We offer multiple reporting options to our workers, including a helpline that gives callers an option to report concerns anonymously, which we promote 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 Ethics and Compliance team 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 policy does not allow ads containing adult-oriented content that target 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 policy 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 battle, and we are always seeking ways to ensure our systems and practices stay ahead of the evolving risk.

**Google Play:** Our policy does not allow apps that contain or promote sexually explicit content, such as pornography and escort services.

### Product features

**Search feature:** In 2014, we added a feature to Search that helps victims of modern slavery to more easily find 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 [now available in 12 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 and “Report Abuse” buttons integrated into our products. We also invite users to contact us with complaints about illegal content or abuse through our product Help Centers.

### Grants

**Global hotlines:** We supported Polaris Project’s Global Hotlines Program with a US\$3 million Global Impact Award from Google.org and technical support from Google Ideas. For nearly a decade, Polaris has run the U.S. National Human Trafficking Resource Center hotline, which serves as a model for other hotlines worldwide. Collaboration between these hotlines—especially the sharing of data and technology—enables better support for victims and identifies trends and hotspots to help guide prevention and intervention.

**Technology development:** We have donated US\$15 million to organizations on the front lines of the fight against modern slavery. These grants have been used to support ongoing work and technology development, such as Thorn’s [Spotlight tool](#), which helps law enforcement improve the efficiency and effectiveness of domestic sex-trafficking investigations.

**In-kind support:** Google for Nonprofits offers free products—including Google Apps Suite for Nonprofits, Google Earth Outreach, Google One Today mobile phone application for fundraising, the YouTube Nonprofit Program, and AdWords grants—to help anti-modern slavery organizations raise awareness of their work and run education and deterrence campaigns.

### Partnerships

**UK Living Wage Initiative:** The [Living Wage Foundation](#) is an initiative that annually calculates a minimum hourly living wage for the UK, generally, and London, specifically. Google UK worked with the Living Wage Foundation to certify that all Google UK employees, suppliers, and vendors receive a living wage. Google UK is proud to have earned accreditation as a Living Wage employer.

## Moving forward

Modern slavery is a complex challenge that cannot be solved overnight. Therefore, our efforts to combat these practices are ongoing, evolving, and continually improving. We intend to increase our efforts to ensure that modern slavery is not taking place in our supply chains and business operations.

This statement was approved by Google Inc.’s Board of Directors.



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