



2023

Statement Against Modern Slavery

1. Overview

Google LLC (Google) and its subsidiaries and controlled entities—including Google UK Ltd., Google Australia Pty Ltd., Google Cloud Australia Pty Ltd., Google Canada Corp., Google Cloud Canada Corp., Google Switzerland GmbH, Google Payment Ltd., Global Infrastructure UK 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.

Our [Human Rights Statement](#) details our commitment to respecting human rights, including the right to freedom from slavery. We expect all who work with us—employees, suppliers, and contractors—to comply with our [Policy Against Modern Slavery](#). Our [Company Code of Conduct](#) requires that our employees and members of our extended workforce abide by all applicable laws, including those preventing modern slavery. We expect all suppliers to follow our [Supplier Code of Conduct](#), which prohibits modern slavery, and we evaluate supplier performance against the Supplier Code of Conduct each year. We did not identify any incident of modern slavery in our own operations or supply chain in 2023. Similarly, we have not identified any loss of income resulting from the steps taken to eliminate modern slavery. Any incident of child labor would be addressed in accordance with the ILO-IOE Child Labor Guidance Tool For Business.

We are issuing this statement pursuant to the UK Modern Slavery Act¹, Australia Modern Slavery Act², California Transparency in Supply Chains Act, Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act³, and the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour⁴, which require Google and certain of its subsidiaries and controlled entities to disclose efforts to ensure that modern slavery is not taking place in our supply chains and business operations. This is our eighth statement, covering our 2023 financial year (January 1 - December 31, 2023).

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, "Google," "the company," "we," "us," "our," and similar terms include Google, its subsidiaries, and its controlled entities, unless the context indicates otherwise. "Modern slavery," refers to slavery, servitude, forced or compulsory labor, child 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.

2023 Highlights

| Tech Against Trafficking

In 2023, Google supported [Tech Against Trafficking](#)’s supply chain data workstream, which aims to enhance data interoperability and sharing across the supply chain on modern slavery risks. We also supported the initiative’s [Accelerator Program](#), which aims to advance and scale the work of organizations that offer promising technology solutions to combat human trafficking.

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

Google supported the development of GBCAT’s modern slavery and child labor [policy templates](#) for suppliers, [case studies](#) and best practice examples, and a [compendium](#) to the Toolkit for Corporate Suppliers that supports procurement teams in their efforts to combat modern slavery.

| Social Impact Funding

Google and Googlers (including corporate matching of employee donations, cash grants, and ad grants) gave funding totalling over US\$ 5.5 million in 2023 to organizations fighting modern slavery.

1 This statement is being made pursuant to [part 6 of the United Kingdom Modern Slavery Act 2015 by XXVI Holdings Inc.](#), the entity which ultimately owns Google LLC and all its subsidiaries, including Google UK Ltd., Google Payment Ltd., Global Infrastructure UK Ltd., and DeepMind Technologies Ltd., the reporting entities under this Act. This statement was prepared in consultation with Google UK Ltd., Google Payment Ltd., Global Infrastructure UK Ltd., and DeepMind Technologies Ltd.

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

3 This statement is being made pursuant to [section 11\(4\)\(b\)\(ii\) of Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act by XXVI Holdings Inc.](#), the entity which ultimately owns Google LLC and all its subsidiaries, including Google Canada Corp. and Google Cloud Canada Corp., the reporting entities under this Act. This statement was prepared in consultation with Google Canada Corp. and Google Cloud Canada Corp.

4 This statement is being made pursuant to [Article\(9\) of the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour by XXVI Holdings Inc.](#), the entity which ultimately owns Google LLC and all its subsidiaries, including Google Switzerland GmbH, the reporting entity under this Ordinance. This statement was prepared in consultation with Google Switzerland GmbH.

2. Structure, business, and supply chain

Google is a wholly owned subsidiary of Alphabet Inc. (Alphabet). Google's core products and platforms include ads, Android, Chrome, Google Cloud, devices, Gmail, Google Drive, Google Maps, Google Photos, Google Play, Search, and YouTube. Google generates revenues by delivering relevant, cost-effective online advertising; cloud-based solutions that provide enterprise customers of all sizes with infrastructure and platform services as well as communication and collaboration tools; sales of other products and services, such as apps and in-app purchases, and devices; and fees received for consumer subscription-based products. We are continually innovating and building new products and features that will help our users, partners, customers, and communities.

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. We work with suppliers in over 80 countries. With the support of our suppliers, Google is able to offer our core products and platforms such as those described above, with broad and growing adoption by users around the world. The hardware in our data centers helps power all of those products as well as a broader set of cloud-based products and services, including Google Workspace collaboration tools and satellite mapping and analysis platforms like Google Earth. Our consumer hardware devices include Pixel, Nest, and Fitbit products, and other devices. 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. For more information on our supply chain and supplier responsibility efforts, see the [2023 Supplier Responsibility Report](#).

3. Internal management, accountability, and programs

We have a dedicated global lead who manages our Supplier Responsibility and Anti-Modern-Slavery programs. Our Supplier Responsibility program is committed to ensuring Google works with suppliers who treat the people in their workforce with dignity and respect, maintain safe and healthy workplaces, and conduct business ethically in accordance with our [Supplier Code of Conduct](#), as well as relevant laws and regulations. Our Anti-Modern-Slavery program addresses modern slavery risks in the company's supply chains and business operations. Our Chief Compliance Officer, who leads the Office of Compliance and Integrity (OCI), maintains oversight of both programs. In 2023, our Chief Compliance Officer 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 2023, our global lead for Anti-Modern-Slavery and Supplier Responsibility provided an update on the status of the Supplier Responsibility program—which includes addressing modern slavery risk—to the Supplier Responsibility Steering Committee, which comprises our Chief Compliance Officer and leaders from our data center, hardware, and extended workforce business areas.

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

4. Policies addressing ethical conduct and prevention of modern slavery

We expect everyone who works with us—employees, suppliers, and business partners—to conduct business ethically. We have embedded our commitment to international human rights standards and principles in numerous policies and procedures.

- Our [Human Rights Statement](#) lays out our commitment to respecting the rights enshrined in the Universal Declaration of Human Rights and its implementing treaties, as well as upholding the standards established in the United Nations Guiding Principles on Business and Human Rights (UNGPs).
- Our [Company Code of Conduct](#) outlines the standards we expect all employees and members of our extended workforce to uphold. This includes respecting user privacy, security, and freedom of expression. Separately, the Code also requires that employees and members of the extended workforce comply with all applicable laws, including those protecting human rights, preventing modern slavery, and prohibiting discrimination, harassment, and retaliation.
- Our [Supplier Code of Conduct](#) sets forth supplier expectations designed to protect the health, safety, and treatment of workers, including the prohibition of any form of modern slavery. The Supplier Code of Conduct is based on the Responsible Business Alliance Code of Conduct; international standards, such as the UNGPs, ILO International Labour Standards, and the Universal Declaration of Human Rights; and our own values.
- Our [Policy Against Modern Slavery](#) defines modern slavery, gives a concrete list of prohibited actions, and provides guidance on how to address suspected instances of modern slavery.
- Alphabet's [Conflict Minerals Policy](#) directs suppliers to perform due diligence on the source and chain of custody of minerals used to manufacture products for Google. We expect our suppliers to source only from conflict-free smelters, such as those that are compliant with Conflict-Free Smelter Program assessment protocols, and to work with suppliers to achieve conflict-free sourcing.

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. Modern slavery risk factors and risk assessments

We believe that certain risk factors contribute to modern slavery risk in electronics supply chains. These factors include, but are not limited to, working with suppliers that: operate in countries where modern slavery risks are prevalent, subcontract work, hire foreign migrant workers, and are associated with raw material extraction, hardware manufacturing, and certain indirect services (e.g., food services, janitorial services, and security providers).

We regularly 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, supplier questionnaires, 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 2023, we continued work on a product-level risk assessment, which identified Google products that could be associated with modern slavery. We began working with product teams to develop risk mitigation and management solutions for the products identified. We plan to complete this work in 2024.

For more information on our ongoing risk assessments and remediations in our supply chain, please refer to pages 21-29 of our [2023 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 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

Our employees and members of our extended workforce are trained on our Code of Conduct. The training covers 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 in roles related to hardware supplier management complete an online training course on our Supplier Code of Conduct and Supplier Responsibility program. Our extended workforce managers also complete an online training course on our Supplier Code of Conduct. Both online trainings include guidance on modern slavery red flags, anti-modern-slavery best practices, and how to report modern slavery concerns.

We continued deploying an online modern slavery training course for our supplier managers in business units identified as high risk based on our 2021 modern slavery risk assessment. The training covered modern slavery indicators prevalent in industries pertinent to our supplier base, worker populations most vulnerable to modern slavery, and sample risk scenarios involving modern slavery indicators. The training also explained how supplier managers can better understand the risk profile of the suppliers they manage and how to report 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 on-site audits and engagement with our suppliers.

We work with independent parties 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 Committee, 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 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.

In 2023, our suppliers underwent 207 on-site audits. Our audits identified multiple non-conformance findings related to the Supplier Code of Conduct categories of "Freely Chosen Employment" and "Working Hours and Wages," which contain key indicators related to modern slavery risk. These include the following:

Freely Chosen Employment

- excessive employment termination notification requirements for workers
- monetary penalties for early termination of employment
- worker-paid recruitment fees
- employment contracts with unclear critical terms and conditions

Working Hours and Wages

- working hours in excess of 60 hours per week
- ineffective procedure governing overtime
- insufficient overtime compensation
- delay or withholding of wages, or deduction 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:

Corrective Action Plans

- reduce excessive termination notification requirements
- restrict prohibited fees and penalties
- make timely payments or reimbursements of wages and fees
- provide workers employment contracts with clear terms and conditions in their own language, and prior to them departing their home country if a migrant worker
- address root causes for worker shortages
- develop an effective overtime procedure
- explicitly state that overtime is voluntary
- prohibit illegal wage deductions and withholdings as a disciplinary measure

For more details on how we manage corrective action plans, see page 24 of our [2023 Supplier Responsibility Report](#).

Audit findings and corrective actions are periodically presented to the Supplier Responsibility Steering Committee 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 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 addition, we conduct online worker surveys and focus group discussions at certain suppliers. In 2023, we heard from more than 2,200 members of our supplier workforce via worker surveys, focus group discussions, or our third-party audit process.

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.

OCI exercises oversight over the Supplier Responsibility program. 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 Committee for approval. Once approved, the Supplier Responsibility team works with our suppliers to communicate our expectations and request evidence of adherence to our standards. For more information on our audit findings, please refer to pages 25-29 of our [2023 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. Our Supplier Code of Conduct also requires suppliers to maintain reporting channels for their workers to raise concerns, including those related to modern slavery.

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. Any incident of child labor would be addressed in accordance with the ILO-IOE Child Labor Guidance Tool For Business. In the last financial year, we did not identify any incident of modern slavery in our own operations or supply chain. Similarly, we have not identified any loss of income resulting from the steps taken to eliminate modern slavery.

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.

Product-related policies

- **Advertising:** Our [advertising policies](#) do not allow ads that: contain adult-oriented content targeting minors; promote sexually explicit content (including content with underage or non-consensual sexual themes); advertise for compensated sexual acts, mail-order brides, or marriage brokers; or otherwise 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 [illegal activities](#), such as modern slavery and human trafficking. We also prohibit sexually explicit content, such as pornography, and content that promotes sexual acts in exchange for compensation, such as escort services.

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 11 countries and 13 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.
- **Removing problematic listings on Google Maps:** In partnership with an independent 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:** We deploy 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 identifying children being exploited to expedite their potential rescue.
- **Responsible Mining:** We are a member of the Responsible Minerals Initiative (RMI), which [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.
- **Industry Collaboration:** To support industry innovation and collaboration to combat modern slavery, we engage with BSR's Human Rights Working Group ([HRWG](#)), the Responsible Business Alliance ([RBA](#)), and the Global Business Coalition Against Human Trafficking ([GBCAT](#)). In 2023, we supported [Tech Against Trafficking](#)'s supply chain data workstream, which aims to enhance data interoperability and sharing across

the supply chain on modern slavery risks. We also participated in the initiative's [Accelerator Program](#), which aims to advance and scale the work of organizations that offer promising technology solutions to combat human trafficking. Through our membership in GBCAT, we supported the development of GBCAT's modern slavery and child labor [policy templates](#) for suppliers, [case studies](#) and best practice examples, and a [compendium](#) to the Toolkit for Corporate Suppliers that supports procurement teams in their efforts to combat modern slavery.

Employee engagement and awareness

- **Social Impact Funding:** Google and Googlers (including corporate matching of employee donations, cash grants, and ad grants) gave funding totalling over US\$5.5 million in 2023 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:

- Update our online modern slavery training for supplier managers in 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 resources such as the [toolkit](#) on *Addressing Forced Labor and Other Modern Slavery Risks*, the toolkit's [Compendium](#), and infographics on [forced labor](#) and [deceptive and coercive recruitment](#).

This statement was reviewed by relevant internal teams and approved by XXVI Holdings Inc., a Delaware corporation and sole managing member of Google LLC.⁵

In accordance with the requirements of Canada's Fighting against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above. I have the authority to bind XXVI Holdings, the entity which ultimately owns Google Canada Corp. and Google Cloud Canada Corp.



Secretary⁶, XXVI Holdings Inc., sole managing member of Google LLC
Chief Legal Officer and Secretary of Google LLC, and President, Global Affairs, Chief Legal Officer and Secretary of Alphabet Inc.

May 24, 2024

⁵ This approval is provided pursuant to section 14(2)(d)(ii) of the Australia Modern Slavery Act 2018

⁶ In his capacity as Secretary of XXVI Holdings Inc., Mr. Walker is authorized to sign this statement