



# 2018 Modern Slavery Statement

Google LLC (Google) and its subsidiaries, including Google UK 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.

We are issuing this statement pursuant to the UK Modern Slavery Act 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 third statement, covering our 2018 financial year (January 1 - December 31, 2018).

Google's subsidiaries 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 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 "contingent workforce suppliers" and "contingent workers," which includes suppliers and supplier employees that work at Google facilities.

# Highlights

## ■ Policy Against Modern Slavery

We updated and publicly posted our [Policy Against Modern Slavery](#) to demonstrate our commitment to combating modern slavery.

## ■ Reporting Helpline

We translated Google helpline posters into nine additional languages and posted them in kitchens in Google cafes globally, reaching thousands of contingent workers.

## ■ Supplier Risk Assessment

We evaluated our contingent workforce suppliers for labor and modern slavery risk, and processed higher-risk suppliers through our Responsible Supply Chain due diligence program.

## ■ Responsible Supply Chain

We expanded and updated our [Responsible Supply Chain website](#), which highlights several projects our Responsible Supply Chain team is working on to combat modern slavery.

We published our [2018 Responsible Supply Chain Report](#).

## ■ Google Cloud Collaboration

We partnered with Thorn and Interpol to deploy Google Cloud machine learning to help locate children who are victims of sexual exploitation and/or human trafficking.

## ■ Combating Child Trafficking

In 2018, we provided more than 6,000 hours of free consulting services to Thorn through the Google.org Fellowship program.

## Structure, business, and supply chain

Google is a wholly owned subsidiary of Alphabet Inc. (Alphabet). Google's business includes our main products, such as Google Ads, Android, Chrome, Google Cloud, Google Maps, Google Play, Search, and YouTube, as well as hardware products, such as Pixel, Nest, and Google Home 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. Beyond our advertising business, we also generate revenue from sales of digital content, hardware devices, and our cloud services. Our anti-modern slavery efforts require strong collaboration and engagement with our global suppliers that manufacture products or provide services on our behalf.

Google is a large purchaser of goods and services required for business operations. We therefore partner closely with our direct

suppliers to understand and evaluate their supply chain practices. Our philosophy is to work in partnership with 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

Our Chief Ethics and Compliance Officer continues to oversee a team focused on combating modern slavery in our 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 across our 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 Responsible Supply Chain Steering Team, 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

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 standards 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 2018, we updated and publicly posted our [Policy Against Modern Slavery](#) to demonstrate our commitment to combating modern slavery. The policy defines what modern slavery is, 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 can result in contract termination.

As previously reported, in 2017, Google's Compliance Steering Committee sought to expand the types of suppliers required to comply with our Supplier Code of Conduct. In 2018, we amended our contract templates to require compliance with our Supplier Code of Conduct. In addition, we completed a risk assessment of our contingent workforce suppliers. This led to the identification of a higher-risk population of contingent workforce suppliers; we asked these suppliers to sign our Supplier Code of Conduct. As of the writing of this report, 94% of our targeted contingent workforce suppliers have signed our Supplier Code of Conduct.

## Risk assessment

We continue to assess modern-slavery risk in our supply chains, and in 2018, we initiated a supply chain-wide risk assessment that includes components specific to modern slavery. Our assessment processes involve review and analysis 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. In 2018, as a result of our risk assessment processes, we increased our focus on Google's contingent workforce suppliers.

We also continued our work in other higher-risk areas of our supply chain based on previous risk assessments, such as seafood and hardware. In 2017, we worked with our first-tier food suppliers to identify and assess risk related to their largest seafood suppliers in our California Bay Area seafood supply chain. In 2018, we expanded this project internationally to identify their largest seafood suppliers in each geographical region worldwide in order to assess their efforts to eradicate modern slavery from their supply chains.

For more information on our ongoing risk assessments in our hardware supply chain, please refer to [Google's 2018 Responsible Supply Chain 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.

As mentioned above, in 2018, based on our risk assessment findings, we focused additional due diligence efforts on an identified population of higher-risk contingent workforce suppliers.

## Training

Training on our Code of Conduct reinforces the expectation that employees, contingent workers, 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 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. In 2018, over 300 employees managing relationships with higher-risk suppliers completed the online training.

## Assessing and reporting on effectiveness

We perform periodic independent third-party audits at higher-risk hardware and non-hardware suppliers' facilities. The audits include in-depth facility 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 of Conduct, 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. In 2018, we published our second annual [Responsible Supply Chain Report](#). This report provides more detailed information about our above-mentioned audit and supplier engagement efforts.

In 2018, our audits identified multiple findings related to the category "Freely Chosen Employment," including:

- Workers paying prohibited fees and not being reimbursed in a timely fashion
- Workers not receiving reimbursement for travel costs
- Document retention practices inconsistent with ensuring that workers maintain control of their identity documents
- Not providing secured lockers for migrant workers' personal documents
- Inadequate or missing policies related to overtime and working age

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, ensure that workers maintain control of their identity papers, provide secure lockers for personal documents, and have policies in place to manage their adherence to our Supplier Code of Conduct.

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 a wage 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 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 workers, including a helpline that gives callers 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. In 2018, we translated Google helpline posters into nine additional languages and posted them in kitchens in Google cafes globally, reaching thousands of contingent workers.

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 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 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 [available in 13 countries and 15 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

- **Rescuing children from exploitation** In 2018, in partnership with Thorn and Interpol, Google Cloud created an engineering initiative, Office of the CTO Cloud for Service, committed to deploying Google Cloud to help locate children who are victims of sexual exploitation and/or human trafficking. As part of this effort, we joined Interpol in three hackathons, resulting in new approaches for using Google Cloud machine learning for language translation and video review tools, dramatically enhancing efforts to find victims.
- **Combating child trafficking** In 2018, Google provided more than 6,000 hours of free consulting services to Thorn through the [Google.org Fellowship program](#). Google employees leveraged artificial intelligence and machine learning to improve Thorn’s technology, which is used to identify victims of child sex trafficking.
- **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 third year in a row.
- **Eliminating child mining** Google is collaborating with [PACT](#), a nonprofit international development organization, on a project that has set out to eliminate child labor in cobalt and tin mining in the Democratic Republic of the Congo. The effort involves working in-region with NGOs and governmental entities to assess the current state of child mining, identify root causes, and develop mitigation plans to ultimately eliminate child mining by providing economic alternatives to families. In 2018, PACT assessed the strengths and weaknesses of the local NGOs and child protection services that have been a part of the project, their potential long-term roles as part of a comprehensive child labor remediation strategy, and steps required to fulfill their mandates. PACT has stated that in Manono, Democratic Republic of the Congo, the effort has led to a [meaningful reduction in child mining](#).
- **Industry collaboration** To support industry innovation and collaboration, we have engaged with the [BSR Human Rights Working Group \(HRWG\)](#), Global Business Coalition Against Trafficking ([GBCAT](#)), and the Responsible Business Alliance ([RBA](#)).

## Employee Engagement and Awareness

- **Charitable giving** Google matched over US\$650,000 of employee donations in 2018 to 74 organizations on the [Global Modern Slavery list](#), such as the Bay Area Anti-Trafficking Coalition and the Polaris Project.

## Moving forward

Modern slavery is a complex challenge that cannot be solved overnight. Our efforts to combat these practices are ongoing, evolving, and continually improving. We made progress in 2018 and intend to continue our momentum in 2019.

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

A handwritten signature in black ink that reads "Kent Walker". The signature is written in a cursive, slightly slanted style.

**Kent Walker**

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

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