



Supplier Responsibility Report 2026

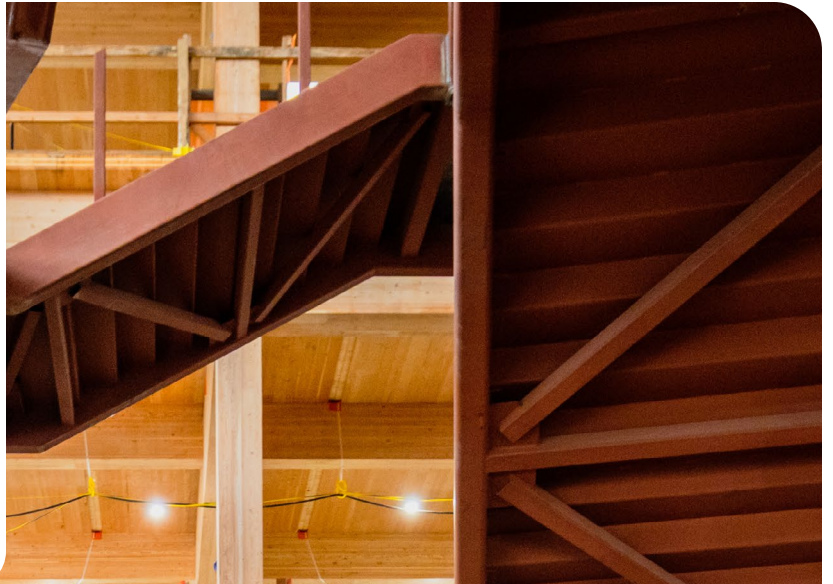


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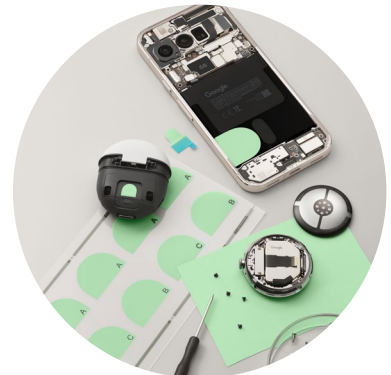
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Executive letter: Supplier responsibility at Google

At Google, we believe that the strength of our global impact is inextricably linked to the integrity of our supply chain. As we navigate an increasingly complex global landscape, our commitment to a sustainable and responsible supply chain remains a core pillar of how we do business in pursuit of our company’s overall [mission](#) to organize the world’s information and make it universally accessible and useful. Our [Supplier Code of Conduct](#) serves as the foundation for our expectations and interactions with our suppliers by setting forth requirements for labor and human rights, health and safety, environmental responsibility, ethics, compliance, and management systems.

The insights, data, and stories in this year’s report reflect both our progress and our ongoing commitment to advancing our Supplier Responsibility program. Rather than simply identifying vulnerabilities, our focus remains on identifying and addressing critical risk trends and driving measurable accomplishments. For example, in 2025, we leveraged new tools and methodologies to enhance overall auditing integrity, and we deepened our internal partnerships to create a unified chemical compliance strategy—a critical initiative at the intersection of human and environmental health.

As global regulatory standards and challenges evolve, so does our approach to due diligence. Over the last few years, Google has taken proactive steps to build and strengthen our traceability frameworks, providing us greater insight into

the shifting risks within our supply networks. This enhanced understanding has allowed us to refine our program, focusing on collaboratively advancing supplier capacity to manage and remediate existing and newly identified risks, and consistently uphold increasingly rigorous standards. This year, we successfully expanded our Responsible Minerals Sourcing program beyond traditional 3TG minerals (tantalum, tin, tungsten, and gold), ensuring that our commitment to ethical sourcing is as comprehensive as the technology we build. Furthermore, because human rights and environmental sustainability are deeply interconnected, we are continuously evolving our due diligence practices while innovating to improve the sustainability of our products and operations. To learn more about Google’s environmental supply chain efforts, please see our [2026 Environmental Report](#).

The achievements documented in this report reflect our firm belief that transparency and resilience are ongoing practices. By combining innovative technology with human-centric values, we are working toward a future that is more equitable for everyone.

Through continuous evaluation and deep collaboration with our partners, we will continue to harness artificial intelligence, advanced analytics, and interdisciplinary expertise to drive year-over-year progress—ensuring that every link in our supply chain supports the well-being of the communities we touch.

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About our suppliers

We work worldwide with suppliers that support our business and operations, including hardware manufacturing and indirect services. In doing so, Google is able to offer our core products and platforms—Android, Chrome, Gmail, Google Drive, Google Maps, Google Play, Search, and YouTube. The hardware in our data centers helps power all those platforms 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, Fitbit, and more.

About this report

Established in 2012, Google’s Supplier Responsibility program encompasses suppliers providing a wide range of products and services. Suppliers are held accountable to our [Supplier Code of Conduct](#), and our site assessment program prioritizes hardware, logistics, and extended workforce suppliers.

In 2017, we published our first Supplier Responsibility Report, which outlined our framework, tools, and key performance

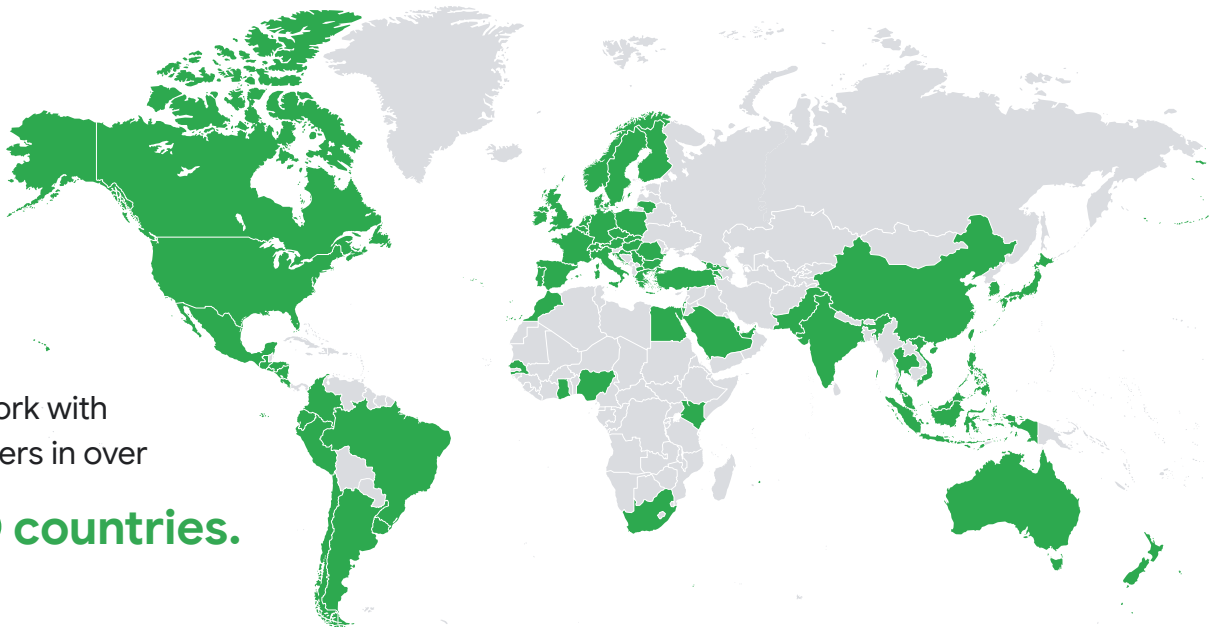
metrics. This report covers our 2025 fiscal year (January 1 through December 31, 2025) and highlights our ongoing commitment to the health and well-being of the communities and individuals within our supply chain. Through sharing various 2025 initiatives, this report examines the successes, obstacles, and future goals of the program. All reported data is global and annual unless otherwise specified.

To explore additional resources such as white papers, case studies, and blog posts regarding our Supplier Responsibility program, please visit our [Supplier Responsibility website](#).

Between 2024 and 2025, the total number of supplier countries decreased because of a strategic effort to streamline our supplier base.

We work with suppliers in over

65 countries.





Our approach



The responsible, tech-forward supply chain of the future

We aspire to create a supply chain model for the future that accomplishes the following:

- **Builds for everyone.** We want to collaborate with suppliers and peers across industries and service sectors to create a safer, fairer, and more responsible supply chain.
- **Makes things better.** We want our engagement efforts to make a positive impact on every supplier's workplace, community, and ecosystem.
- **Transforms with technology.** We want to invest in, build, and enable technologies to create the world's most trusted supply chain.



Supplier responsibility across our supply chain

Supporting people, strengthening communities, and protecting the planet at every stage



Meeting today's evolving global needs

While global value chains¹ can drive progress through safe employment, local investment, and environmental protection, they also face significant challenges, ranging from subpar working conditions, unethical and illegal behavior, unethical conduct to ecosystem degradation and poor health and safety practices. Responsible value chains aim to prevent and mitigate these adverse impacts while maximizing positive outcomes for both people and the planet.

We are strategic in how we engage with suppliers, their communities, and the people and ecosystems that are integral to both. We assess interconnected impacts throughout our value chain, define our responsibility, and leverage our knowledge and influence to prevent and mitigate harm.

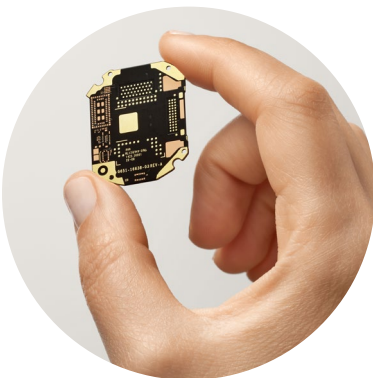
This work requires collaboration—both internally and with partners—as well as ongoing transparency, dialogue, and accountability from everyone in our supply chain. Moreover, it requires a willingness to adjust our strategies and continually improve as we learn.

We benchmark across the industry to inform expectations for ourselves and our suppliers. We partner with non-governmental organizations (NGOs), industry groups, peers, and suppliers to encourage responsible behavior across our entire supply chain. We enable stronger and more resilient communities by investing in areas like worker engagement, ethical recruitment, health and safety, and supplier responsibility programs (with a focus on responsibility in chemical use and across critical mineral supply chains).

Spotlight

Programs for expanding human rights and environmental expertise in Google Cloud sourcing teams

Building a responsible supply chain is a collective responsibility that requires deep collaboration across our internal functions. To embed these values into our daily operations, we have actively engaged with internal stakeholders, specifically Google business owners and procurement teams. Throughout the year, we provided dedicated training programs focused on human rights and environmental due diligence and our Supplier Code of Conduct. More than 400 individuals completed training in 2025.



Adapting to a dynamic regulatory landscape

The shift toward mandatory responsible sourcing is accelerating globally, and Google is proactively preparing for compliance with these additional regulations.

While not exhaustive, the following EU mandates are key due-diligence regulations applicable to Google:

- The [EU Batteries Regulation](#) will mandate mine-to-market traceability, requiring rigorous due diligence on raw minerals, such as lithium, cobalt, natural graphite, and nickel.
- Moving beyond product-specific rules, the [EU Corporate Sustainability Due Diligence Directive \(CSDDD\)](#) will broaden existing obligations by requiring the implementation of comprehensive human rights and environmental due diligence across the value chain.
- The [EU Forced Labour Regulation](#) will establish an enforcement mechanism authorizing authorities to legally ban and seize any shipments found to be produced through the use of forced labor at any stage in the value chain.

With new regulatory mandates on the horizon, Google is proactively strengthening its due diligence practices. Many of these frameworks—such as the CSDDD—extend to our entire value chain and internal operations; the details below focus on the key preparatory steps we are taking to secure our supply chain:

1. Strengthening supply chain traceability in collaboration with suppliers and industry partners
2. Improving how we identify and prioritize risks with consideration of human rights and environmental factors
3. Developing risk-based and proportionate plans to prevent potential impacts, mitigate risks, and remediate actual harms across the value chain
4. Collaborating with and supporting suppliers to improve existing grievance mechanisms or establish new ones and engaging with affected stakeholders, such as individuals, groups, or communities
5. Exploring new systems for analyzing grievances related to our suppliers' operations to inform program enhancements

Google will continue to report progress and strengthen its readiness for upcoming compliance deadlines.



Focusing on our people, communities, and planet

Our Supplier Responsibility program spans nine priority areas, organized into three strategic categories: putting people first, strengthening communities, and protecting the planet. This report details our progress within the first two categories, while the environmental performance of our global supplier network is featured in our [2026 Environmental Report](#).

These areas are interwoven and mutually reinforcing. For example, treating the people who work in our supply chain with dignity and respect creates stronger, more empowered communities. Investing in infrastructure in supplier communities generates more social and economic opportunities and helps reduce reliance on extractive industries such as mining. Replacing carbon-based energy sources with renewable options reduces greenhouse gas emissions and increases community and global well-being.



Putting people first

We are committed to a fair and responsible supply chain that generates shared value across our global footprint. This commitment includes:

- Requiring fair treatment for the people in our supply chain
- Ensuring safe and healthy workplaces
- Operating and sourcing ethically

Strengthening communities

We aspire to support local communities everywhere we do business. This includes uplifting livelihoods in communities along the supply chain. Priorities include:

- Sourcing materials responsibly
- Increasing community resilience
- Investing in initiatives that deliver measurable economic benefits across our supplier network

Protecting the planet

We are progressing toward the transition to an energy-efficient, low-carbon, circular supply chain that makes smart use of the Earth's resources, protects ecosystems, and supports decarbonization. Please see our [2026 Environmental Report](#) for specific insights into our environmental priorities, such as:

- Using AI to provide helpful benefits to people, science, and the environment
- Bringing more energy online to decarbonize grids globally
- Advancing next-generation energy sources

How we make it happen

Our program strategy is built on five pillars.

1. Supplier standards. Google maintains robust supplier standards to identify, prevent, and mitigate adverse impacts on human rights and the environment throughout our value chain. These standards apply to all direct, indirect, sub-tier,² and subcontractor suppliers.

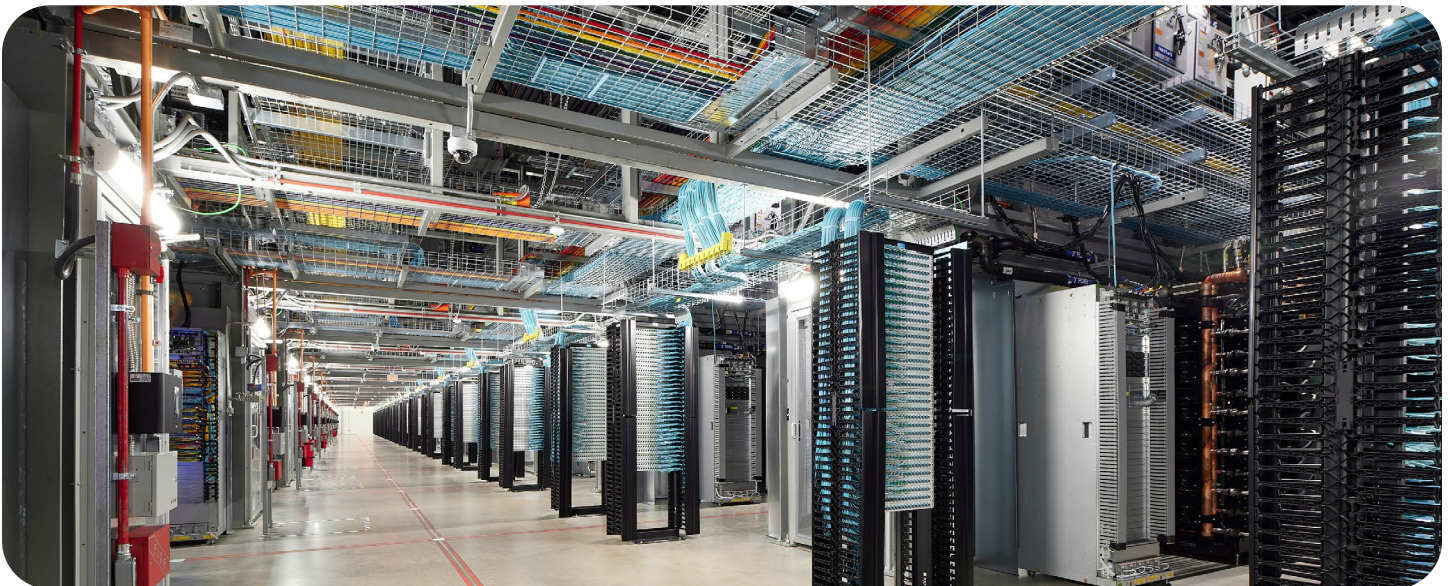
First, these standards are anchored in our [Supplier Code of Conduct](#), which sets clear expectations for protecting the health, safety, and human rights of workers, including the prohibition of all forms of modern slavery. The Supplier Code of Conduct is aligned with the Responsible Business Alliance (RBA) Code of Conduct; international standards, such as the United Nations Guiding Principles on Business and Human Rights, the International Labour Organization Standards, and the Universal Declaration of Human Rights; and Google's values. Our supplier contracts are anchored by compliance with our Supplier Code of Conduct.

Second, suppliers must also comply with Google's [Policy Against Modern Slavery](#), which clearly defines modern slavery, gives a concrete list of prohibited actions, and provides guidance on how to address and report suspected policy violations.

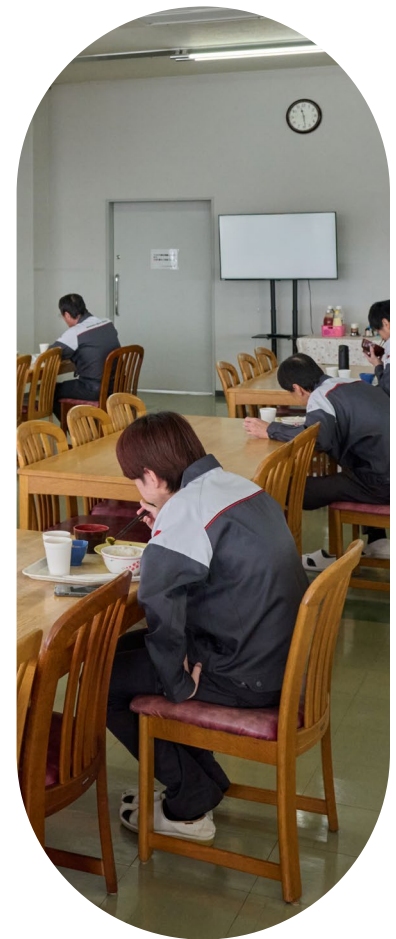
Third, Alphabet's [Conflict Minerals Policy](#) directs suppliers to perform due diligence on the source and chain of custody of minerals used to manufacture products for Google. We expect our suppliers to source only from conflict-free smelters, such as those that are compliant with the Responsible Minerals Initiative's (RMI) Responsible Minerals Assurance Process (RMAP) assessment protocols, and to work with their own suppliers to achieve conflict-free sourcing.

Finally, Google's [Restricted Substances Specification](#) sets a standard for the elimination of hazardous materials in all Google-branded consumer products, accessories, manufacturing processes, and retail packaging.

2. Supplier engagement. Through mechanisms such as self-assessments, risk assessments, and on-site third-party audits aligned with industry standards, we validate if and how suppliers are meeting our expectations, identify potential risks, and address concerns. We also work closely with manufacturing suppliers to improve capabilities in areas such as environmental performance, healthy and safe workplaces, and transparency in the mineral supply chain.



- 3. Community investment.** We work with suppliers and upstream communities to improve lives, protect the local environment, and minimize the negative impacts of manufacturing and raw materials procurement. By collaborating with global stakeholders, we ensure community access to clean energy, safeguard ecosystems, and foster community resiliency. Our efforts include collaborating with a range of local and global partners, stakeholders, and researchers to ensure community access to clean energy; supporting conflict-free mining; and investing in programs that create economic alternatives to mining for local citizens.
- 4. Partnerships.** We partner with NGOs, industry groups, suppliers, and peers to tackle issues bigger than any company could address alone. Our partners bring a wide range of expertise and creative thinking to issues like modern slavery, worker well-being, impact sourcing, transparency, reliance on raw materials, access to electricity, and renewable energy markets.
- 5. Worker engagement.** Through anonymous worker surveys, face-to-face interviews, and pilot studies, we strive to create avenues for workers in our supply chain to provide feedback directly to our Supplier Responsibility program. This allows us to proactively identify adverse human rights impacts and evaluate whether suppliers are providing fair, safe, and favorable working conditions. We prioritize worker-centric feedback to ensure our remediation efforts are grounded in the actual experiences of the people in our supply chain.



Spotlight

Integration with supplier business reviews

To drive accountability and ethical alignment, we have integrated supplier responsibility performance directly into our core business review processes, driving social and environmental performance metrics with the same rigor as other business scorecard criteria. By embedding Supplier Responsibility data into balanced scorecards and supplier reviews, we empower internal business owners and suppliers to make data-driven decisions that prioritize compliance with our Supplier Code of Conduct and promote worker well-being and environmental stewardship. This strategic integration shifts the relationship from oversight to partnership, ensuring that responsible business practices are a priority within our supply chain.

2025 highlights



Putting people first

Completed 236 on-site audits

Our suppliers underwent 236 on-site audits.³ This number increased significantly in 2025 after we automated data collection for RBA Validated Assessment Program (VAP) audits.

Engaged more than 12,200 people in our supply chain and related communities

We gathered feedback from more than 12,200 people who work in our supply chains through survey responses, audit interviews, and worker engagement pilot projects, allowing us to gain important insights into priority areas.

Hosted 1,314 participants at Supplier Summits

A total of 1,314 participants from over 765 unique supplier organizations gathered at our annual Supplier Summits to advance our shared commitment to promoting ethical practices across our supply chain.

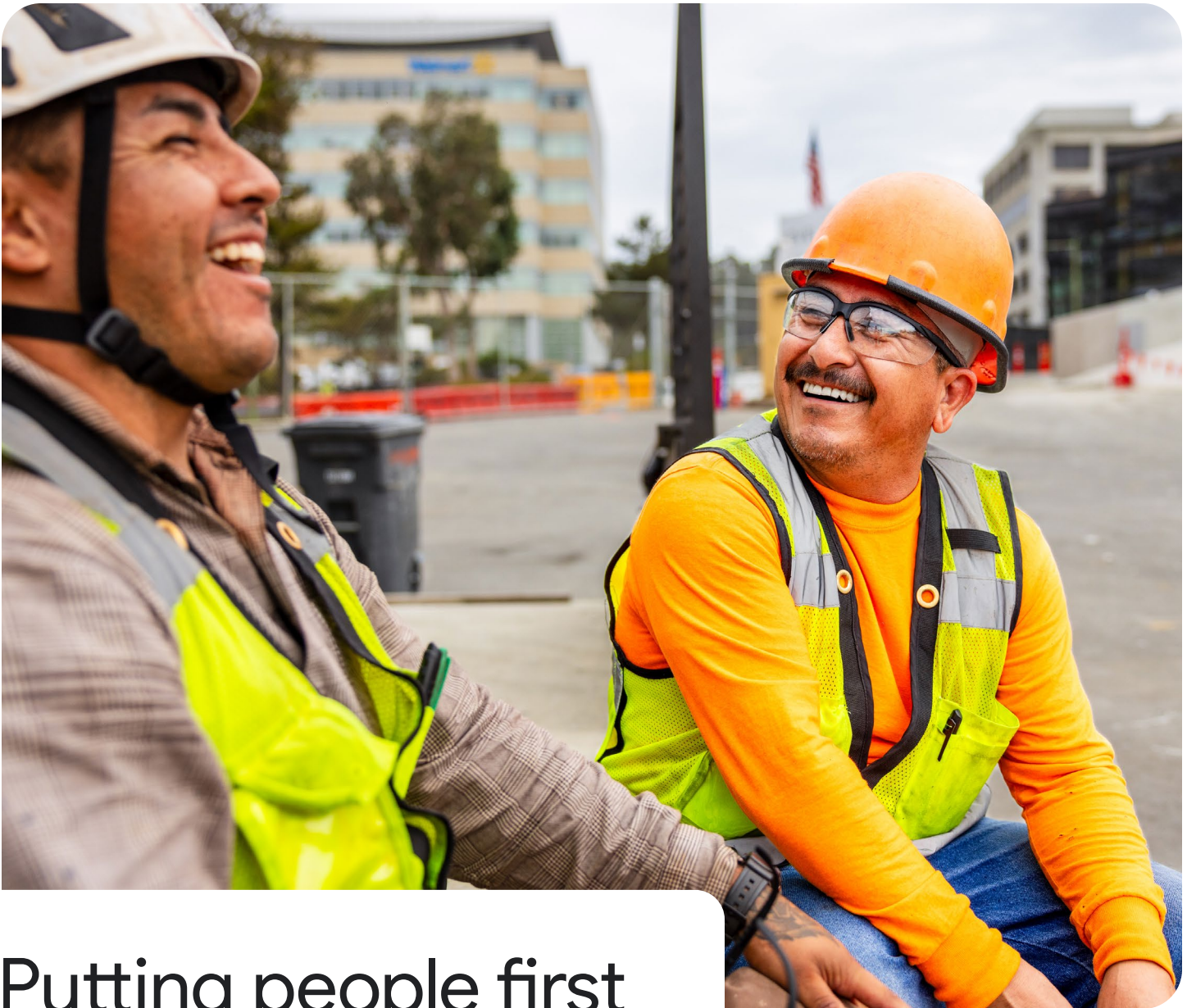
Strengthening communities

99% of the smelters we used were compliant

In 2025, 99% of the smelters or refiners we used for 3TG were compliant.⁴ We continue to observe heightened geopolitical risks that impact the ability of smelters to maintain their RMAP certification status. As a result, we believe achieving 100% conformant status will be increasingly difficult. We're currently working to ensure that the noncompliant smelters or refiners achieve compliance.

Over US\$1 million collectively delivered to Congo Power project funding

Between 2018 and 2025, the Congo Power Initiative completed 15 projects to provide solar power to communities affected by mining. These projects generated work opportunities for more than 1,400 people in the Democratic Republic of the Congo.



Putting people first

We're committed to building a healthy, responsible supply chain. This means honoring and respecting everyone who engages with Google's supply chain and striving to ensure their workplaces promote worker well-being. Our baseline is to ensure that every person working in our supply chains is treated with dignity and respect, is provided safe and healthy workplaces, and upholds high ethical standards. Our program aims to position Google as a catalyst for industry change, driving progress to establish safer and fairer supply chains globally.

Laying a foundation for fairness

We believe every person working in our supply chain should be treated fairly and with respect. We accomplish this with policies and processes designed to protect the people who make our products and provide valuable services to our company.

The foundation of this work is our Supplier Code of Conduct, which includes our expectations for labor and human rights, health and safety, environmental responsibility, ethics, and management systems. We hold suppliers accountable to our Supplier Code of Conduct through a multi-step assessment process, as outlined in the “Assessing conformance with our Supplier Code of Conduct” section below.



Engaging people in our supply chain

Direct worker feedback is vital to our audit process and broader supplier engagement. In 2025, our worker engagement program continued to focus on identifying workers’ challenges and concerns, particularly regarding our Supplier Code of Conduct.

In 2025, we heard directly from more than 12,200 workers throughout our supply chain via our audits, surveys, and pilot projects. As we gather feedback, we prioritize the areas that workers identify as the most important to them.

Spotlight

Worker engagement: Worker voice surveys

As part of our commitment to ethical supply chain management and continuous improvement, we launched a worker voice project to gain deeper insights into the factory worker experience. This initiative moves beyond traditional auditing by using anonymous digital surveys to capture candid feedback on labor practices and workplace culture. Survey reports identified specific opportunities for improvement, allowing sites to implement targeted corrective actions. We evaluated the success of these remediations through a follow-up survey conducted 12 months later to ensure lasting change. The surveys indicated a high level of worker participation at sites and identified the following key positive changes:

- **Improved wage and compensation fairness:** There was a notable improvement in the perception of wage fairness at the aggregate level across the factories surveyed.
- **Strong professional development:** Training and career development programs remained a consistently strong area. Workers reported that they had the support needed to perform their roles effectively.
- **Advancements in labor rights:** Decreased risks of forced labor due to improved policies and worker training on labor rights.
- **Supportive management:** Supervisor care and training support indicators remained stable or showed slight improvements.
- **Increased engagement:** Specific sites reported modest gains in worker engagement and likelihood to recommend the facility as a good place to work.

Following the success of this project, we are integrating these insights into our broader Supplier Responsibility strategy—scaling worker voice and capacity-building programs to drive greater awareness across our supplier network.

Creating safe and healthy workplaces

Workplace safety is a top priority, now more than ever. We remain committed to ensuring that everyone who makes our products or provides services to us works in a healthy and safe environment. In accordance with our Supplier Code of Conduct, our suppliers are expected to maintain workplaces that comply with all applicable laws and to implement a management system for identifying and resolving related issues.

Suppliers must identify, evaluate, and control worker exposure to all safety and health hazards—including chemical, biological, physical, and ergonomic stressors—and provide proper design, controls, procedures, and guidance in factory production and other work environments. We expect suppliers to plan for potential emergencies by implementing controls, training all appropriate personnel, and providing personal protective equipment.

Further, to uphold just and healthy working conditions, suppliers must provide employees with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. If provided, housing facilities must be clean, safe, and fair as well as include adequate personal space and hot water for bathing and showering.

Case study

Factory capacity building: RBA's Responsible Factory Initiative

The Responsible Factory Initiative (RFI) is a specialized capability-building program developed by the Responsible Business Alliance (RBA). The program combines training and coaching to help suppliers build internal systems for long-term adherence to RBA's Code of Conduct and Google's Supplier Code of Conduct. In partnership with the RFI, six Google Cloud supplier sites in China, Malaysia, Taiwan, and Thailand were enrolled in the 12-month program. Participating sites achieved an average 78% improvement in meeting the requirements of both the RBA's Code of Conduct and Google's Supplier Code of Conduct, effectively remediating 104 of 135 findings identified during the on-site assessments. Findings were remediated in the areas of labor, health and safety, environment, and management systems. Further improvements are in process with Google's support, and 10 additional supplier sites were enrolled in 2026, covering China, Japan, Malaysia, Mexico, Philippines, and Vietnam.



Driving healthier manufacturing processes

Google actively collaborates with suppliers and industry partners to identify and eliminate harmful substances from our manufacturing process. We provide the knowledge and support necessary to transition to safer alternatives. All suppliers are required to comply with our [Restricted Substances Specification \(RSS\)](#), which governs specific substances of concern in Google-branded consumer products, accessories, data center products, manufacturing processes, and retail packaging. In 2025, we updated our RSS to include:

- Seven additional chemicals in section 5, “Restrictions for Manufacturing Processes”
- New chemical testing requirements

To ensure supplier compliance, we implement a multi-faceted approach:

- Collect Full Material Disclosure (FMD) and Manufacturing Restricted Substances List (MRSL) data
- Conduct on-site chemical management assessments (CMAs)
- Educate suppliers on mitigating occupational health and safety risks associated with chemical use

Our FMD program gives us an in-depth understanding of how process chemicals are used during manufacturing or maintenance. By collecting data on chemical types and associated processes, we can evaluate occupational exposure risks and help suppliers minimize these risks and phase out restricted substances.

Launched in 2021 at key contract manufacturing sites, the FMD program has expanded to include final assembly manufacturing sites and commodity suppliers. During 2025, we evaluated 79 facilities and 296 associated chemical processes, assessing their applications and exposure control measures. Based on these assessments and follow-up investigations, we provided consultations and facilitated the adoption of safer alternatives for high-toxicity chemicals. In 2025, this initiative improved workplace safety for over 2,000 people who directly handle chemicals at these sites.⁵

We also operate an MRSL assessment and declaration program, coupled with comprehensive training, to gather information from suppliers regarding their use of manufacturing restricted substances.

As part of the FMD and MRSL programs, we conduct on-site CMAs at suppliers’ facilities to verify the efficacy of chemical hazard controls and provide consultation to help suppliers redesign their processes with safer alternatives. If a supplier fails to meet our safety standards, we create corrective action plans (CAPs) identifying specific items for resolution. We also monitor supplier CAP progress to ensure thorough remediation.

Ensuring compliance

79

Facilities evaluated

4

On-site CMAs conducted

39

Findings identified



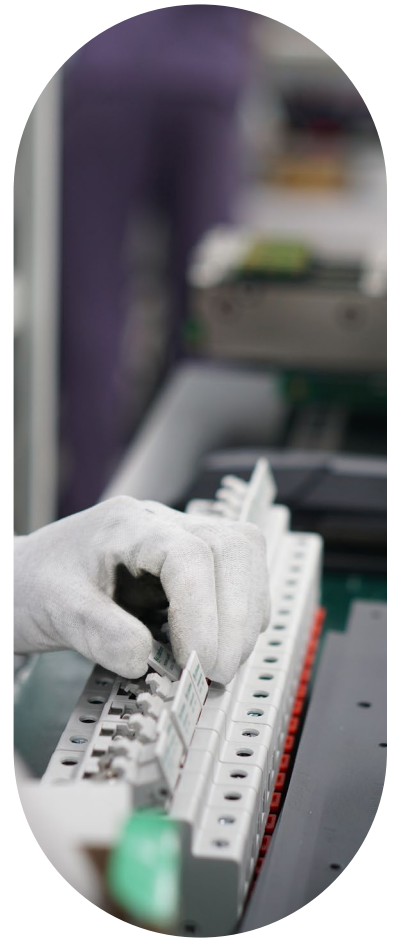
In 2025, we conducted four on-site CMAs that identified 39 findings, and we are tracking remediation through our CAP management program. Since the launch of our CMA framework, we've guided suppliers in resolving over 300 issues, significantly strengthening their overall chemical management systems and practices.

Beyond ongoing assessments, maintaining safe chemical management also hinges on comprehensive supplier education. We provide specification documents to help suppliers identify, assess, and mitigate occupational risks related to chemicals used in manufacturing. These guidelines require suppliers to comply with Google's RSS for all products and components they manufacture or provide to Google. Furthermore, manufacturing sites must establish and implement a chemical management program to evaluate the purchase, use, transportation, and responsible disposal of all hazardous chemicals. This includes training personnel who work with chemicals, conducting job hazard assessments, and implementing control mechanisms to protect workers and the environment.

To enhance supplier education and support alliances across the industry, we worked with the RBA to integrate guidance on Responsible Chemical Management (RCM) and our FMD program into the RBA Specialty Validated Assessment Program on Chemical Management. This guidance is available in both English and simplified Chinese. In 2025, 130 suppliers completed our RCM training.

These training sessions are provided to suppliers participating in our FMD and MRSL programs, all of which are selected based on their risk profiles and the potential chemical exposure associated with their processes. We also collaborate with strategic suppliers to promote RCM practices throughout their own supply chains.

To maintain a transparent and accountable supply chain, we prioritize clear communication of our rigorous operational standards. This past year, we launched a phased rollout of our updated Supplier Code of Conduct and RSS requirements to a segment of suppliers in our global partner network through an automated supplier management platform. This digital framework enables systematic distribution and ensures updated requirements are formally acknowledged. In its first year, this initiative successfully secured compliance acknowledgements from 60% of targeted Cloud suppliers, marking a significant milestone in our ongoing commitment to environmental stewardship and ethical labor practices.



Setting a high bar for ethics

We expect our suppliers to uphold the highest standards of business integrity and corporate social responsibility. Suppliers must maintain a zero-tolerance policy regarding all forms of corruption, bribery, extortion, and embezzlement.

To verify compliance, suppliers are required to keep transparent books and records, disclosing financial and operational performance in accordance with applicable laws and industry practices. Any identified nonconformance must be met with immediate remediation and a comprehensive root-cause analysis. Additionally, suppliers must implement robust technical and organizational measures to safeguard confidential information against unauthorized access and cyberattacks.

Addressing ethical conduct and preventing modern slavery

In conjunction with our Supplier Responsibility program, the Anti-Modern Slavery program oversees our commitment to combating modern slavery throughout Google, including in our supply chain. We have zero tolerance for any form of modern slavery in our supply chain.

Our Human Rights Executive Council (HREC) is composed of senior leaders across relevant product areas and functions. The Council is formally integrated into Google's Trust and Compliance governance program, which is led by the Trust & Compliance Council (TCC). The TCC, in turn, is co-chaired by our Chief Legal Officer. The HREC provides oversight and guidance across Google's human rights efforts and ensures issues are being addressed consistently.

Forced labor, indentured labor, debt bondage, and other forms of modern slavery can occur in industries with many workers and few regulations. In addition, supply chains are complex, and forced labor risks may occur several tiers removed from where Google has contractual relationships.

In light of this, we continually review and improve our processes to detect modern slavery in the supply chain. In 2025, we formalized a traceability program and piloted several tools that incorporate public trade data, industry knowledge, and leading-edge research into forced labor networks. These tools enable us to better identify and address potential forced labor risks in our sub-tier technical infrastructure and consumer hardware supply chains. AI and machine learning will continue to play a role in analyzing data and uncovering risks related to forced labor. We are initially focusing this effort on our consumer and Cloud hardware supply chains.

Spotlight

Empowering suppliers through AI-driven guidance

To ensure our high standards for ethical and technical performance are accessible to suppliers, we launched a dedicated NotebookLM for the Supplier Responsibility program in 2026 for all suppliers in Google's supply chain. This tool allows suppliers to interact with our comprehensive technical documentation, audit manual, and Supplier Code of Conduct in a more intuitive, conversational way. It provides accurate, context-specific answers derived directly from our official policies.

We recognize that some program requirements are complex, and language should never be a barrier to understanding them. The NotebookLM tool allows suppliers to query our requirements in their native language, ensuring that expectations are clearly understood at every level of the supply chain. This investment reflects our commitment to a partnership-based approach, providing our suppliers with the tools they need to succeed and meet our expectations.



In 2025, we hosted eight Supplier Summits to exchange insights, align on sustainability objectives, and reinforce our shared commitment to responsible sourcing. We discussed ways to advance healthy, fair workplaces, accelerate accessible clean energy, and drive circular, waste-free operations. In total, we trained 1,314 individuals from over 765 unique supplier organizations on sustainability and responsible labor practices.

We also train our vendors, temporary staff, and independent contractors to report concerns of illegal or unethical activity and to avoid working with parties that engage in modern slavery or other illegal practices. In addition, we provide online training courses that include anti-modern slavery education for Googlers who work in roles related to supplier management. In 2025, we updated these trainings to align with our updated Supplier Code of Conduct, reflect recent supplier audit findings, highlight new regulations, and include new content on the supplier engagement life cycle.

For more information, please see our [Policy Against Modern Slavery](#), which defines modern slavery, lists prohibited actions, and provides channels for reporting concerns. You can also read our [2025 Statement Against Modern Slavery](#).

Spotlight

Regional summits

In 2025, Google Cloud's Supplier Summits (California and Taiwan editions) featured interactive, high-level sessions dedicated to supplier responsibility and sustainability. Beyond responsible business practices, compliance challenges, and traceability content, the summits used an anonymous live survey to gather real-time insights from participants.

This initiative aimed to raise awareness of key priorities and risks while gathering direct feedback on the challenges suppliers face in implementing responsible business practices. Suppliers highlighted several challenges, including labor shortages, increasing supply chain and regulatory complexity, and volatility in customer demand. We also saw positive trends in suppliers' progress on raw material traceability and their understanding of responsible migrant labor hiring practices to prevent forced labor.

To sustain this momentum, Cloud is actively deepening its engagement with suppliers to strengthen our human rights and environmental due diligence. This includes clarifying audit expectations, guiding remediation efforts, and scaling beyond-compliance initiatives such as worker voice and capacity-building programs.

Assessing conformance with our Supplier Code of Conduct

We follow a multi-step process for evaluating our suppliers. Performing regular assessments helps us to address potential issues early and to support our suppliers in taking corrective actions.

Supplier self-assessment process

Self-assessments kick-start the evaluation and risk assessment process. We ask all new suppliers to complete a detailed self-assessment that helps gauge their understanding of and commitment to our expectations. Their responses help us identify potential risks of nonconformance with the requirements in our Supplier Code of Conduct and provide a launching point for suppliers to critically consider their own social and environmental impact. To ensure these responses accurately represent current operations, we require suppliers to update these assessments every two years.

Many suppliers already have strong programs that fulfill our requirements. When a self-assessment indicates that a supplier doesn't meet our expectations, we work with the supplier to ensure it develops programs to address our concerns.

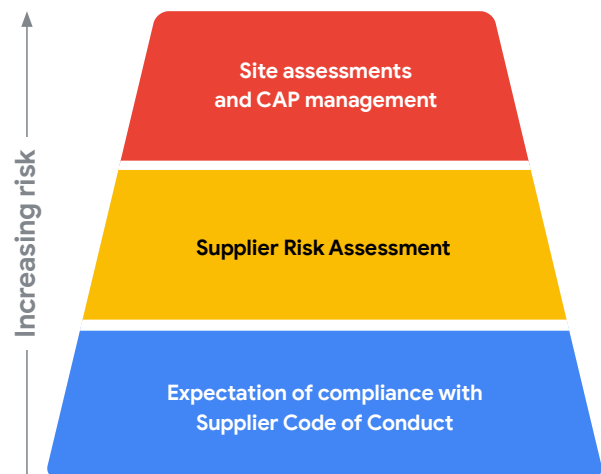
Understanding and evaluating risks

In addition to having suppliers evaluate their operations, we perform our own ongoing due diligence to verify compliance and understand our supply chain's risks.

Our extensive Supplier Risk Assessment process evaluates the social, environmental, and ethical risks of working with individual suppliers or groups of suppliers. The results give our suppliers insights to help them make better-informed sourcing decisions and proactively manage their own supplier relationships.



Risk-based supplier engagement model



When assessing a supplier's risk, we look at a variety of factors, including:

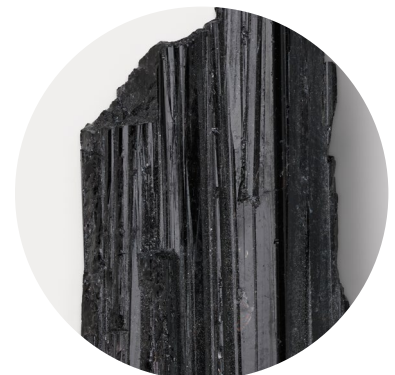
- **Country-level risks.** Are certain countries at higher risk for certain types of social or environmental problems?
- **Product- and service-specific risks.** Do suppliers use chemically intensive manufacturing processes? How physically demanding is the work involved?
- **Supplier fines or convictions.** Has the supplier previously been convicted of human rights, environmental, or corruption violations?
- **Google's supplier engagement efforts.** Has the supplier submitted a self-assessment? If problems were found during an audit, has the supplier taken steps to resolve them?
- **Supplier relationship.** How strategic is the supplier to our business? Do we influence the design of the product or the selection of the components?

Findings from the self-evaluation and initial risk assessment determine whether we conduct additional assessments at suppliers' facilities. We prioritize on-site audits for our contract manufacturers, original equipment manufacturers, and suppliers identified as higher risk.

Spotlight

Google Cloud's supply chain resilience: Risk hub addition of Supplier Code of Conduct compliance risk

In Google Cloud, we consolidated supplier data into a single, real-time dashboard, allowing our business teams to instantly evaluate a partner's overall performance. This shared visibility allows the Supplier Responsibility and Procurement teams to collaborate proactively on supplier development, resolving potential issues quickly and ensuring our supply chain remains reliable, compliant, and highly competitive.



Site assessments

To assess conformance with Google’s standards and applicable laws and regulations, an approved third-party audit firm conducts every Supplier Code of Conduct audit. We encourage our suppliers to participate in the RBA Validated Assessment Program (VAP) audits, which we began recognizing for our higher-risk suppliers in 2023. These audits include in-depth factory, facility, and dormitory tours; management meetings; on-site worker interviews; and reviews of suppliers’ documents and records. Recognizing VAP standards is a key component of our strategy to align with and promote industry-wide efforts to drive collective change across global supply chains.

These assessments of our suppliers’ facilities allow us to determine whether the supplier is meeting our standards, hear directly from the people in our supply chain, and identify opportunities for our suppliers to address issues. Our audits also provide valuable opportunities to raise suppliers’ awareness of their social and environmental responsibilities, promote accountability, understand leading practices, and encourage greater transparency.

Each year we reevaluate our approach to identify ways to make audits more effective at uncovering and mitigating supply chain risk. This year, we implemented two primary changes: expanding our audit scope to include office construction services, and auditing a select number of lower- and medium-risk sites to identify potential gaps in our risk assessment process. Both initiatives yielded valuable insights, some of which are detailed in the “Common nonconformance findings in 2025” section below. With these changes, we were able to prioritize suppliers with less developed management systems and partner closely with them to drive performance improvements.

2025 audit overview⁶

236

Supplier site assessments

1,079

Nonconformance issues identified

Our supplier site assessment types

Supplier Code of Conduct audit

On-site assessment performed by a third-party audit firm and managed by Google.

RBA VAP audit

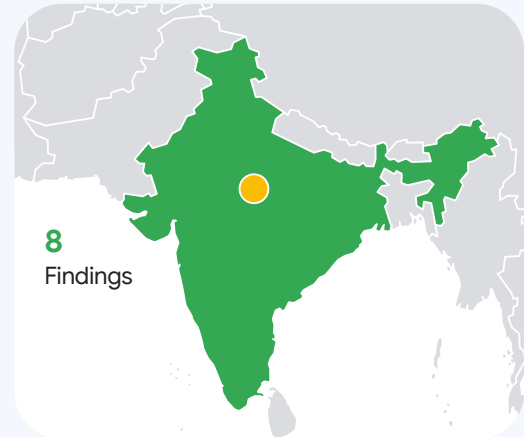
Comprehensive audit process designed to evaluate a company’s adherence to the RBA Code of Conduct, which covers various aspects of corporate social responsibility, including labor, ethics, health, safety, and environmental practices.

Spotlight

Impacts of addressing nonconformances

Example 1:

A supplier in Hyderabad, India, underwent a Supplier Code of Conduct audit and received eight findings, including a Priority finding for failing to pay the correct legal wages for half of the employees sampled. The supplier responded by adjusting the minimum wage for all affected employees earning below the legally required rate and compensating them with the arrears owed. To prevent recurrence, the supplier developed a charter mandating internal approvals and timely reviews of minimum-wage notifications to ensure timely minimum-wage increases.



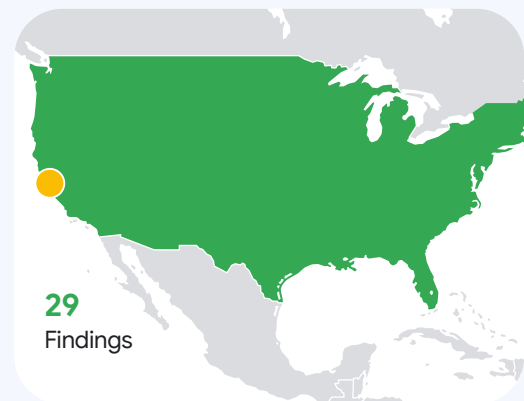
Example 2:

A Supplier Code of Conduct audit in Tokyo, Japan, identified 22 findings. A Major finding related to benefits and wages involved the supplier's reluctance to revise its contracts, specifically regarding the use of pay reduction as a disciplinary measure, which does not align with the RBA's Code of Conduct and Google's Supplier Code of Conduct. After considerable negotiation, the supplier agreed to modify its contracts and remove wage deductions as a disciplinary measure.



Example 3:

A Supplier Code of Conduct audit conducted in Mountain View, California, uncovered 29 findings. The most significant was a Priority finding in which the supplier's subcontractors did not provide detailed payslips to their employees. Through CAP remediation, the supplier was able to support their subcontractor to roll out an itemized payslip to employees that is more transparent and provides details of pay, benefits, and deductions.



Common nonconformance findings in 2025

Because we frequently onboard and audit new supplier sites, the overall distribution of findings remains relatively consistent year over year. We also re-audit existing sites that are identified as higher risk or where we have a significant presence.

As a result, labor remains the most common category of nonconformance, driven by findings related to working hours, wages and benefits, and labor management systems. Health and safety findings were similar to those in previous years, though emergency preparedness findings increased. We also saw an increase in supply chain management findings, particularly related to supplier responsibility.

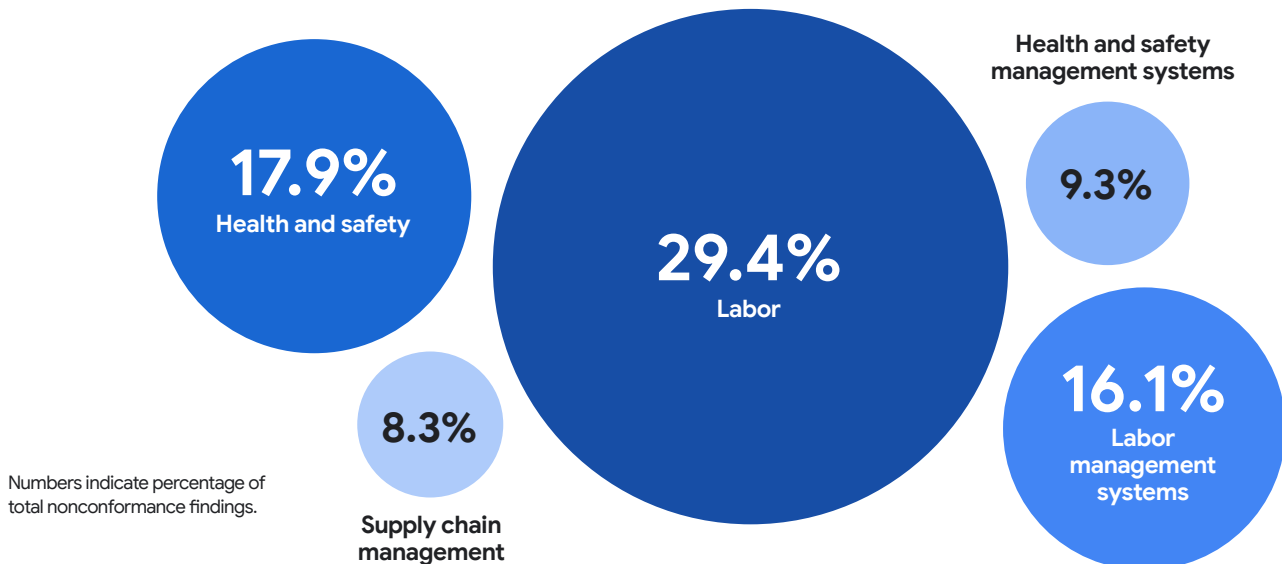
These increases likely stem from our targeted auditing of previously unassessed areas, such as construction sites. Data suggests that newer program participants frequently require

more guidance to align their sub-tier management with Google's Supplier Code of Conduct.

The CAP completion figures in this report are current as of January 2026. The current open status of several CAPs reflects remediation timelines that are still ongoing. We work closely with suppliers to resolve CAPs, providing necessary oversight and guidance to ensure that all root causes are effectively addressed and long-term compliance is maintained.

The CAP conformance rates show how audited sites performed for both Google-managed audits and RBA VAPs. Before accepting VAPs, we assess the findings and implement additional Google oversight to ensure CAP management meets our expectations.

Audit findings by category in 2025



Most common nonconformance findings in 2025



Working hours

In 2025, we found the most instances of nonconformance within the category of working hours. Improving working hours is an area of continued focus within the technology industry. Working excessive hours strains employees' physical and mental health, increases stress levels and risk of injury and accidents, and impairs personal relationships.

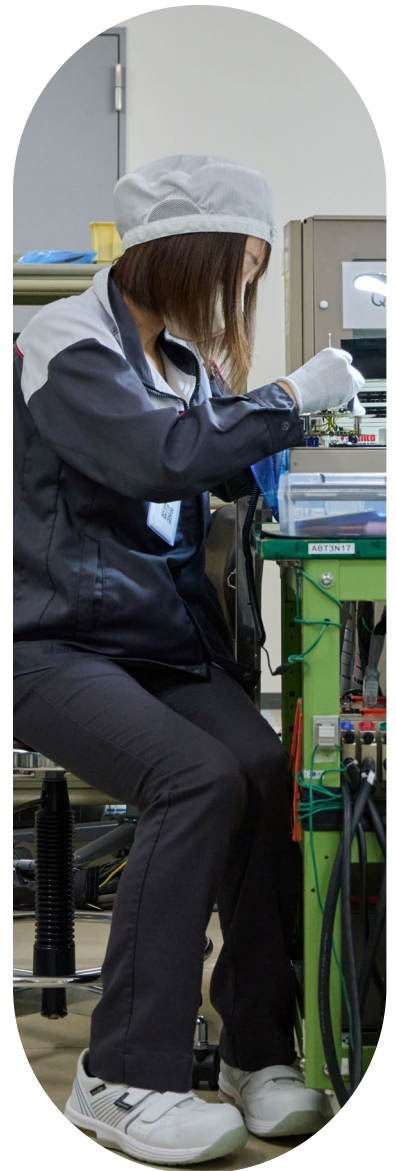
To ensure the people in our supply chain are not overworked, our Supplier Code of Conduct states that workweeks either should not exceed 60 hours (including voluntary overtime) or should comply with the maximum set by local law, whichever standard is stricter. Employees must also be allowed at least one day off every seven days.

We found an overall conformance rate of 50.4% in this category. This includes a 15% improvement following implementation of CAPs at supplier facilities. Issues with working hours often involve several contributing factors, which can take longer to remediate.

Supplier responsibility

We are committed to upholding our Supplier Code of Conduct throughout our supply chain. Our contracts with Tier 1 suppliers mandate compliance and outline enforcement measures. Crucially, our Supplier Code of Conduct communicates our expectation that Tier 1 suppliers require their own suppliers, vendors, and contractors to comply with our Supplier Code of Conduct and to have processes in place to verify this implementation.

We work closely with suppliers through CAPs to reinforce Supplier Code of Conduct expectations across their operations and supply chains. Prior to implementing the CAP process in 2025, conformance in this category stood at 54.3%. After implementation, it rose to 65.4% conformance. This conformance rate falls below our expectations and is due in part to the expansion of our audit scope to include firms that were new to our standards, such as construction firms. Through this process, we identified areas requiring targeted capacity building. We have already refined our audit processes to better support these partners, and we are committed to ongoing collaboration to drive sustained compliance improvements. Our Supplier Summits will continue to include dedicated sessions on supplier responsibility, equipping higher-risk suppliers with the knowledge to mitigate potential risks in their operations and supply chains.



Labor management systems – control processes

Suppliers must establish management systems with clear labor responsibilities for all employees, implement effective labor policies and controls, and provide thorough training on all relevant policies, processes, job-related aspects, and performance targets. This comprehensive approach ensures that all personnel understand their roles and responsibilities, appropriate safeguards are in place, and employees are equipped to meet expectations while adhering to legal requirements and internal standards.

Suppliers are responsible for implementing such management systems—including assessing compliance with laws, regulations, and customer requirements—and then developing and implementing necessary changes. After CAP management efforts, the conformance rate in this category improved from 33.9% to 48.8%.

Wages and benefits

Our Supplier Code of Conduct's wages and benefits standards prohibit discrimination, require timely pay, and mandate that all workers in our supply chain receive at least the legal minimum wage, with overtime compensation at a premium rate. We also expect suppliers to adhere to legal requirements and specific guidelines for learner wages, fair compensation, timely promotions, medical leave, and worker privacy.

Common findings in this category include incorrect overtime pay and failure to pay required social insurance rates. While we collaborate with suppliers to ensure alignment with our Supplier Code of Conduct and legal standards, remediation efforts, such as back paying workers for missing wages, can lengthen implementation timelines. This year, overall supplier conformance rates increased from 52% to 63.8% after implementation of CAPs.

Emergency preparedness

Suppliers must establish comprehensive emergency plans and response procedures to help protect workers, the environment, and property. These mandatory procedures include emergency reporting, employee notification, evacuation protocols, worker training, and recovery planning. Suppliers are also expected to conduct annual emergency drills, maintain fire detection and suppression equipment, keep emergency exits clear, and maintain current emergency contact information.

We take emergency preparedness seriously and expect suppliers to do the same. As we audited more new suppliers this year, we identified gaps in emergency preparedness and worked with suppliers to address them. Some issues may take months or longer to resolve due to the need to obtain construction or other permits to alter emergency exit corridors, for example. Before implementing CAPs with our suppliers, conformance in this category was at 68.5%. After implementation and working closely with our suppliers to address gaps, conformance increased to 78%.

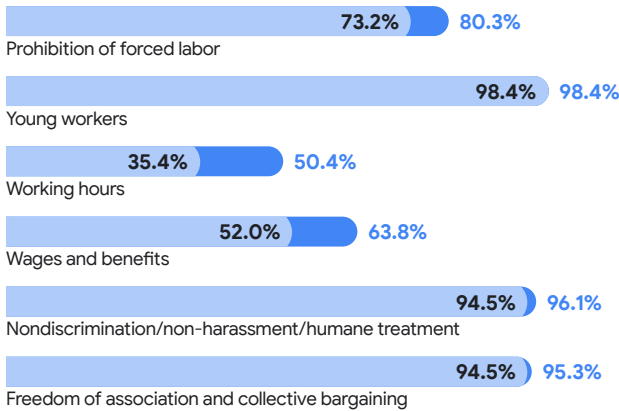
2025 audit conformance data

In the table below, the lighter bars show the percentage of unique audited supplier facilities that had no nonconformance findings for the listed criteria after their audit. The darker bars show the percentage that had no nonconformance findings after the CAP process was completed.⁷

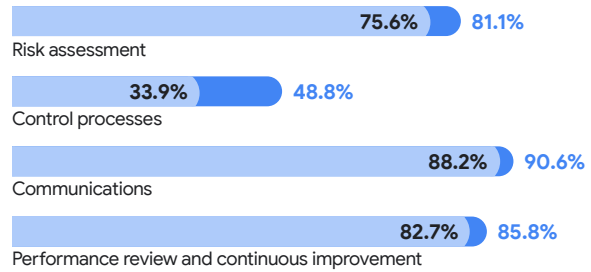
While we remain committed to achieving 100% conformance, the remaining gap typically represents complex cases requiring extended investigation or CAPs with prolonged remediation timelines. These delays often stem from systemic supplier challenges that require deeper engagement to resolve.

● Percentage in conformance before CAP ● Percentage in conformance after CAP

Labor



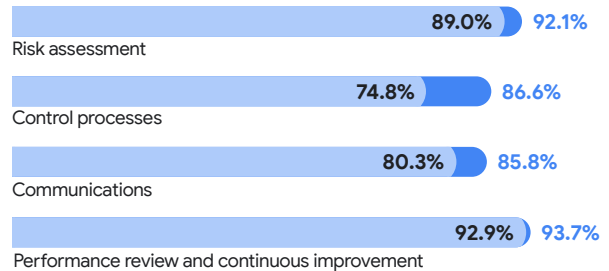
Labor management systems



Health and safety

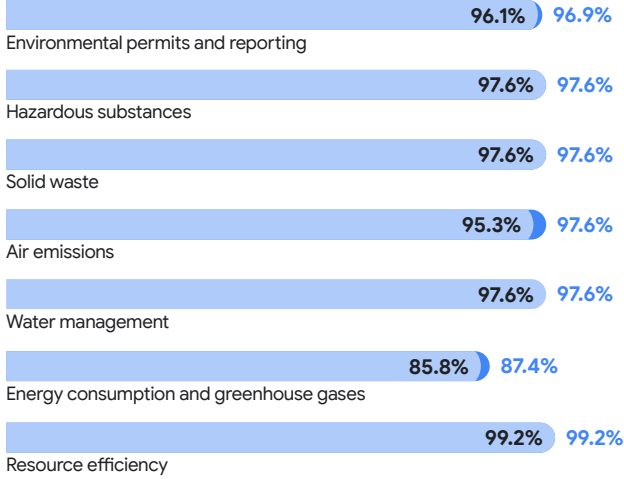


Health and safety management systems



● Percentage in conformance before CAP ● Percentage in conformance after CAP

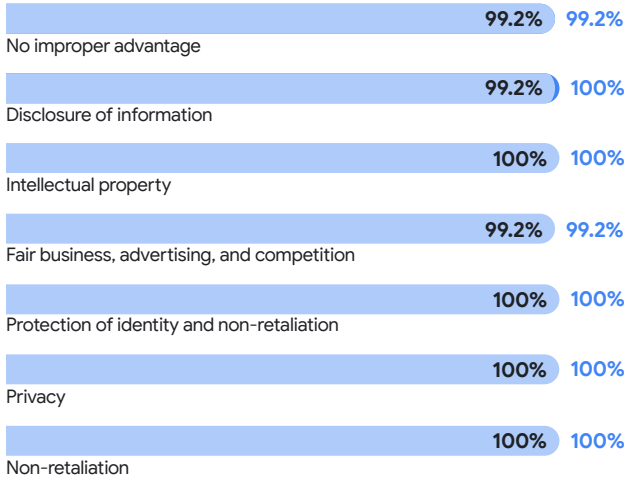
Environment



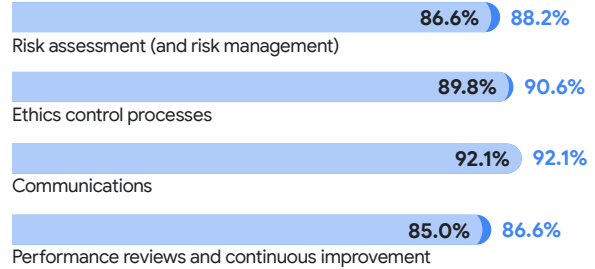
Environment management systems



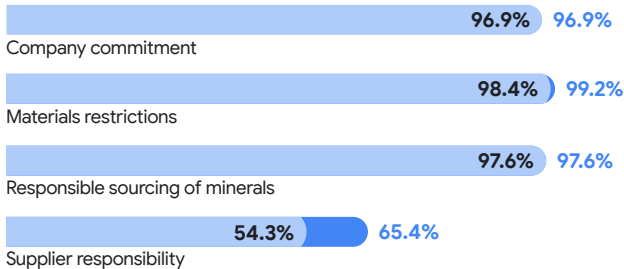
Ethics



Ethics management system



Supply chain management





Sourcing minerals responsibly

We are dedicated to the responsible sourcing of all materials across our hardware and data centers. While industry focus has historically centered on tantalum, tin, tungsten, and gold (commonly referred to as 3TG) to avoid funding conflict in the Democratic Republic of the Congo (DRC) and surrounding countries, we recognize that the adverse impacts extend beyond these specific minerals and territories. As a global consumer of raw materials, we have implemented rigorous processes to identify and address human rights abuses and environmental degradation specifically within our mineral supply chains.

Launched in 2012, our Responsible Minerals program employs a two-pronged approach. The first prong focuses on transparency and due diligence to establish conflict-free mineral sources both within and outside of the DRC and adjoining countries. Our efforts concentrate on smelters, refiners, and mineral processors (known collectively as “smelters”), recognizing their crucial role in the mineral value chain and the significant impact of due diligence at this stage.

The second prong aims to strengthen communities impacted by conflicts potentially funded by the minerals trade in the DRC and elsewhere. We go beyond our immediate supply chain to address the root causes and impacts and to engage in industry action, collaborating to leverage collective resources toward transformative action.

Strengthening due diligence

Our Responsible Minerals program is grounded in Alphabet’s [Conflict Minerals Policy](#), which requires suppliers to source 3TG from certified conflict-free smelters. These smelters undergo rigorous audits conducted by reputable third-party assessment programs, such as the Responsible Minerals Initiative’s (RMI) Responsible Minerals Assurance Process. Our program is also aligned with our Supplier Code of Conduct.

We require annual disclosure from our suppliers regarding their supply chain, which includes information on the mine of origin and a list of smelters used for minerals sourced and used in our products. Suppliers are expected to maintain a documented system of supply chain controls and transparency. This system must include a chain of custody or traceability mechanism that identifies upstream actors and raw material details. Required details may include facility ID, product name, product description, product quantity, country of origin, and third-party verification.

We assess each smelter to ensure it meets our responsible sourcing standards. This means the smelter must be conformant, active,⁸ or verified by a third party as exclusively sourcing raw materials from countries not covered by the 2010 Dodd-Frank Act (collectively referred to as “compliant” smelters in this report). If a smelter is not compliant, we work with our suppliers to engage the smelter to change its practices or undergo a third-party assessment. In some cases, we require suppliers to disengage from noncompliant smelters.

As noted in Alphabet’s [2025 Conflict Minerals Report](#), we identified 292 smelters in our supply chain, of which 99% were “conformant,” “active,” or “not sourcing from the Covered Countries.” We are committed to supporting our suppliers in driving non-conformant smelters to achieve compliance or,



when necessary, transitioning them out of our supply chain. We recognize that more rigorous audit standards and intensified industry-wide mapping efforts have made it increasingly difficult for these facilities to complete third-party audits and maintain or achieve their certified status. Given this trend, we anticipate that reaching 100% conformant status will be increasingly difficult. To address this, we will:

- Assess alternative certification bodies and responsible sourcing standards to expand the scope of our due diligence and maintain rigorous expectations across our supply chain.
- Provide targeted training and support for upstream suppliers and smelters to reinforce the importance of certification and help them navigate evolving requirements.

Recognizing that responsible mineral sourcing is an interdisciplinary challenge that spans industry and sectors, we actively collaborate with other organizations. We're one of more than 500 members of the RMI, which provides independent third-party audits to ensure that smelters meet current conflict-free standards. Our contributions include supporting the RMI Upstream Due Diligence Fund as well as smelter assessments in the DRC and elsewhere. As part of the RMI Smelter Engagement Team Working Group, we engage directly with smelters located in Asia.

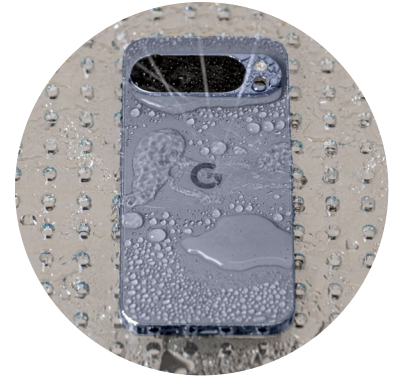
Separately, we're working with peer companies and partners to pursue better tracing and increased support for children's rights. We also create opportunities to hear directly from community representatives to understand the impacts and challenges that communities affected by mining-related conflicts are facing.

Finally, we have begun to assess our cobalt smelters against third-party due diligence findings and ask all of our battery suppliers to submit Extended Minerals Reporting Template (EMRT) reports. We received EMRTs from 100% of our battery suppliers as well as all recycler information for cobalt, lithium, and aluminum in 2025.

Increasing community resilience

We aspire to create stronger, more resilient communities everywhere we do business. Our Responsible Minerals program focuses on two key strategies:

- **Promoting transparency and due diligence:** We strive to ensure responsible sourcing practices throughout our supply chain.
- **Empowering mining-impacted communities:** We invest in infrastructure, essential services, and alternative livelihoods to support community development and resilience.





Through our engagement efforts and partnerships, we strive to make a positive impact on every supplier's workplace, community, and ecosystem—leaving each community better than we found it.

Up to 2 million people in the DRC are dependent on artisanal mining.⁹ We believe that responsible mineral procurement can contribute to economic growth and development in the DRC and adjoining countries. However, the mining industry faces complex challenges.

Widespread poverty is a root cause of conflict, human rights abuses, unsafe working conditions, and environmental degradation of mining areas in the DRC and elsewhere. We can't address this on our own, so we collaborate with governments, non-governmental organizations, and industry partners to provide renewable energy, create alternative livelihoods, and invest in a sustainable future.

Since 2018, we've supported the Congo Power Initiative, which has completed 15 renewable energy projects in the DRC, provided over 26,400 people with access to renewable energy, and helped over 1,400 people achieve a sustainable livelihood through work opportunities in the region. To date, Congo Power has delivered over \$1 million in project funding, and its impact continues to grow.

The Maison Dorcas energy storage expansion project was successfully commissioned on December 22, 2025, in Bukavu, Democratic Republic of Congo. As part of the Congo Power Initiative, the project doubled the energy storage capacity of the Maison Dorcas facility, a community center operated by

the Panzi Foundation to support survivors of sexual and gender-based violence. The facility's programs serve women and girls, who participate in one or two semesters of vocational training in carpentry, jewelry-making, leatherwork, pastry-making, soap-making, tailoring, and sewing. This training is designed to support long-term economic independence. Graduation figures show that 248 women and girls completed these programs in 2024, rising to 266 graduates in 2025. Notably, 135 of the 2025 graduates are heads of households who are now applying their acquired skills to support their families.

Much of the DRC lacks electricity, especially rural areas where artisanal mining takes place—only 20% of people in DRC have access to power. This lack of power hinders healthcare, safety, and economic opportunities. The Congo Power Initiative brings solar energy systems to communities and organizations that provide essential services, like medical facilities or conservation areas. This generates value in multiple ways. For example, solar power ensures that vital medical equipment functions properly and reliably, likely saving lives. Additionally, access to electricity at night improves safety and fosters new business opportunities, strengthening the overall well-being and resilience of these communities. The years of experience implementing these Congo Power projects have informed research for solar energy deployment in rural areas of Central Africa's Greater Lakes Region. However, due to the evolving situation in eastern Congo, the program is turning its focus to southern Congo.

Spotlight

Panzi Foundation

In 2025, the Panzi-Google Tujitegemeye project aimed to empower women and local communities in the eastern DRC's mining sector by promoting responsible sourcing, training women-led cooperatives on ethical mineral trade, and expanding market access for Panzi's jewelry workshop.

Due to escalating conflict, the project shifted focus to the safer island of Idjwi. There, Panzi engaged over 200 mining stakeholders on responsible sourcing practices and provided reproductive healthcare to 130 women via local clinics.

Phase two of the Tujitegemeye project in 2026 will deepen this partnership by prioritizing:

- Connecting mining communities with health and education services
- Training local mining cooperatives on responsible sourcing and due diligence
- Providing advanced technical training for Panzi's jewelry workshop trainers
- Strengthening the Panzi-led, multi-sector task force to align U.S. and DRC stakeholders on responsible sourcing standards

We have been members of the Fair Cobalt Alliance (FCA) for four years and have served on its Steering Committee since 2024. Through the FCA, we support programs focused on improving safety, economic stability, and responsible sourcing practices within artisanal cobalt mining communities in the DRC.

Findings from FCA programs indicated improvements in safety perception, income stability, and awareness of child labor issues. However, income variability and financial inclusion remained significant challenges. These insights underscore that sustainable progress in artisanal cobalt mining requires continued efforts to enhance miner well-being, improve operational practices, foster fair and transparent market processes, and strengthen local cooperatives. The FCA continues to pilot solutions, including



launching and managing Cobalt Credits to bolster its Mine Improvement Fund (read more [in this blog from the FCA](#)).

In July 2025, we completed phase three of a project with the FCA to raise workers' incomes through Village Savings and Loan Associations (VSLAs), implemented by FCA partner Alternatives for Action. In 2025, 603 members participated in the VSLAs, 148 people benefited from financial literacy and entrepreneurship training, and participants established 213 income-generating activities or micro-businesses.



Progress and commitments

Creating a more resilient, transparent, and connected supply chain is a long-term process. We've set a number of goals for our own operations and those of our suppliers to help accelerate our progress.

Here's a look at some of the commitments and progress we made last year. Each of these goals represents our ongoing commitment to make significant progress toward a specific priority. Additionally, we have included new goals for 2026.

Progress against targets

Putting people first

Goal	2025 progress
Empower the voices of the people in our supply chain using various tools to gather anonymous feedback and identify areas for improvement.	Concluded the worker voice project, which deepened our understanding of factory worker experiences by using anonymous digital surveys to go beyond traditional auditing. These insights pinpointed specific areas for improvement, enabling sites to enact targeted corrective actions. Moving forward, we are embedding these learnings into our Supplier Responsibility strategy to strengthen capacity-building initiatives across our supplier network.
Convene Supplier Summits covering topics such as Google’s Supplier Code of Conduct, anti-modern slavery, human rights, and environmental protection.	In 2025, 1,314 participants attended our Supplier Summits. These events included dedicated sessions on our Supplier Responsibility program, which were designed to equip our higher-risk suppliers with the knowledge and competencies to mitigate potential risks in their own operations and supply chains.
Audit a minimum of 50% of higher-risk suppliers to verify conformance with our Supplier Code of Conduct and drive improvements.	Completed 236 audits in 2025, ensuring 100% of our higher-risk suppliers have an active audit.¹⁰ Audited a select portion of our medium-risk suppliers to identify opportunities to build capacity among suppliers that may lack robust Supplier Responsibility programs.

2026 goals:

In addition to continuing the efforts listed above, we aim to:

- Continue assessing the risk level of 100% of suppliers in the Supplier Responsibility program.
- Build capabilities with our suppliers by providing training and tools to address higher-risk topics and common nonconformance issues.

Strengthening communities

Goal	2025 progress
Expand our Responsible Minerals program and partnerships to focus on minerals beyond 3TG (tantalum, tin, tungsten, and gold), cobalt, and mica.	Expanded our Responsible Minerals due diligence framework to ensure readiness for evolving global standards, including the EU Batteries Regulation.
Collaborate with external stakeholders and cross-industry groups to advance responsible sourcing and improve human rights outcomes.	<p>In 2025, we continued to support the Congo Power Initiative, achieving a total of 15 completed projects since 2018. We also continued to participate in the Public-Private Alliance for Responsible Minerals Trade and served on the Steering Committee of the Fair Cobalt Alliance.</p> <p>We contributed to the Responsible Minerals Initiative (RMI) Smelter Engagement Team Working Group and the Initiative for Responsible Mining Assurance Mining Engagement Team.</p>

2026 goals:

In addition to continuing the efforts listed above, we aim to:

- Expand our responsible sourcing program and due diligence framework to cover all mineral inputs.
- Utilize the RMI Additional Minerals Reporting Template and the Extended Minerals Reporting Template to collect data for aluminum, cobalt, copper, lithium, natural graphite, and nickel.
- Partner with strategic suppliers to evaluate new and existing grievance reporting systems that allow all affected stakeholders to report actual or potential adverse impacts across our value chain.



Endnotes

1. This encompasses upstream production activities—from raw material sourcing to design to manufacturing—as well as downstream logistics, transport, and storage handled by partners on behalf of the company. ([Corporate Sustainability Due Diligence Directive Article 3.1g](#))
2. These are entities that provide raw materials or components used by a direct (Tier 1) supplier, rather than by Google itself.
3. This figure includes findings from third-party audits conducted through the Responsible Business Alliance (RBA) Validated Assessment Program (VAP). Google tracks these third-party audit results and observes how the trends in findings align with those identified in Google-managed audits.
4. For the purposes of this report, “compliant” smelters or refiners are those that are conformant, active, or verified by a third party to source from countries other than those covered in the 2010 Dodd-Frank Act. See Alphabet’s [Conflict Minerals Policy](#) for more information.
5. We revised our accounting for the number of people working directly with chemicals to a more conservative approach.
6. These figures include findings from third-party audits conducted through the RBA VAP.
7. These figures are based on our data as of January 2026, to ensure accuracy and completeness and to prevent overlap with our next annual report. Corrective action plans (CAPs) shown as not complete may have been completed prior to publication, depending on CAP closure timelines.
8. Smelters and refiners are defined as “conformant” or “active” by the Responsible Minerals Initiative. Conformant smelters or refiners are those that have been audited and meet the criteria for not directly or indirectly supporting the conflict; active smelters or refiners are those in the process of being audited.
9. [Delve Database](#), accessed April 2026.
10. An audit completed within a 24-month period.

Additional resources

[Environmental Reports](#)

[SEC filings \(2025, 2024, 2023, 2022, 2021, 2020, 2019, 2018, 2017\)](#)

[Statements Against Modern Slavery \(2025, 2024, 2023, 2022, 2021, 2020, 2019, 2018, 2017\)](#)

[Supplier Code of Conduct](#)

[Supplier Responsibility Reports \(2025, 2024, 2023, 2022, 2021, 2020, 2019, 2018, 2017\)](#)

Cover photo caption: A worker monitors construction progress as part of ongoing project oversight.

