



Germany GmbH's Policy Statement

pursuant to the German Supply Chain Due
Diligence Act (LkSG)

1. Introduction

Google LLC (Google) and its subsidiaries—including Google Germany GmbH—are committed to treating all workers with respect and dignity, ensuring safe working conditions, and conducting environmentally responsible operations.

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

Google Germany GmbH maintains offices in Berlin, Frankfurt, Hamburg, and Munich. Google Germany GmbH primarily provides marketing and sales support services to Google entities in the region. Google Germany GmbH relies on suppliers for administrative support, advertising and marketing support, legal and consulting services, janitorial, catering, and security services, among others. Most Google Germany GmbH suppliers are based in Germany or other countries within the European Union.

We are issuing this statement pursuant to the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), which requires Google Germany GmbH to issue a policy statement on its human rights strategy. As such, this statement is prepared based on activities at the Google level, including specific efforts for Google Germany GmbH as required.

For the purposes of this statement, "we," "us," "our," and similar terms refer to Google, unless the context indicates otherwise.

2. Our Commitment to Human Rights

Google's [commitment](#) to human rights, including to the [United Nations Guiding Principles on Business and Human Rights](#) (UNGPs), dates back to our earliest years. In their [first letter to shareholders](#), our founders highlighted Google's goal to "develop services that significantly improve the lives of as many people as possible." This vision continues to guide all of us at Google and we continue to take great care to ensure our products and services take a user-first approach and are made responsibly.

In order to carry out our mission, we conduct ourselves in a manner that respects international human rights standards, including those outlined in the [International Bill of Human Rights](#), which consists of the Universal Declaration of Human Rights and the two main instruments through which it has been codified—the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social, and Cultural Rights. Depending on circumstances, we also consider other international human rights instruments.

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](#) provides detail on executive oversight and governance of our Human Rights Program, which includes due diligence, risk management, and engagement with external experts and affected stakeholders.
- 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. The Code also requires that employees and members of the extended workforce comply with all applicable laws and regulations, including laws that protect human rights, prevent modern slavery, and prohibit discrimination, harassment, and retaliation.
- Our [Supplier Code of Conduct](#) sets expectations designed to establish a baseline of norms and practices for our suppliers covering: labor and human rights, health and safety, the environment, ethics and compliance, and management systems. The Supplier Code of Conduct is based on the Responsible Business Alliance (formerly the Electronic Industry Citizenship Coalition) 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, provides a concrete list of prohibited actions, and provides guidance on how to address suspected instances of modern slavery.
- Our third-party managed Helpline gives our employees and members of our extended workforce an option to report concerns anonymously, including human rights and environmental concerns.
- Alphabet's [Environmental, Health and Safety Policy](#) sets forth our commitment to provide and maintain a safe workplace, while minimizing harm to our people, partners, and planet.
- 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 work with suppliers to achieve conflict-free sourcing.

3. Governance

The UNGPs emphasize the importance of embedding a commitment to human rights across a company's relevant business functions, policies, and procedures. Google manages human rights risks at the corporate level through global programs such as our Human Rights, Anti-Modern-Slavery, and Supplier Responsibility programs. The Human Rights Program advises product teams on potential civil and human rights impacts, conducts human rights due diligence, and engages external experts and stakeholders. Furthermore, our Human Rights Program is a central function responsible for ensuring that we are meeting our commitment to the UNGPs, Global Network Initiative Principles, and other civil and human rights instruments across Google and its products.

The Human Rights Program works in close collaboration with the Supplier Responsibility and Anti-Modern-Slavery teams. The Supplier Responsibility team is committed to working with suppliers that treat their workforce with dignity and respect, maintain safe and healthy workplaces, and conduct business ethically in accordance with our Supplier Code of Conduct and relevant laws and regulations. Our Anti-Modern-Slavery team addresses modern slavery risks in our operations and supply chain, and is responsible for Google's compliance with anti-modern-slavery and other relevant human rights due diligence laws, including the LkSG.

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 Governing Forums, 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 our Human Rights Program, and ensures issues are being addressed consistently.

Our Chief Compliance Officer, who leads the Risk, Compliance and Integrity organization, maintains oversight of the Supplier Responsibility and Anti-Modern-Slavery programs. In late 2025, our Chief Compliance Officer shared the results of the risk analysis – conducted pursuant to the LkSG requirements – in materials provided to the Risk and Compliance Committee of Alphabet's Board of Directors. The results of the risk analysis were also communicated to the Managing Directors of Google Germany GmbH at the end of 2025. Additionally, our global lead for our Anti-Modern-Slavery and Supplier Responsibility programs provided relevant updates on the status of the Supplier Responsibility Program—which includes addressing modern slavery risk—to the Supplier Responsibility Steering Committee, which comprises senior leaders from our data center, hardware, and extended workforce business areas.

4. Due Diligence

Our Operations

Google's Code of Conduct sets forth our foundational expectations for employees and members of our extended workforce regarding privacy, security, freedom of expression, discrimination, harassment, corruption, and compliance with all laws, including those related to preventing modern slavery and protecting human rights. The Code encourages employees and our extended workforce to raise questions or concerns and to report suspected violations. We are committed to maintaining a culture that encourages employees and others to report concerns related to violations of our Code of Conduct, policies, or laws, including our human rights commitments.

That is why we have adopted and promoted policies that strictly prohibit retaliation of any kind for raising such concerns or for participating in an investigation relating to such concerns.

Our employees and members of our extended workforce are trained on our Code of Conduct. The training for employees 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.

We educate our employees about the company's human rights expectations and commitments. For example, the Human Rights Program leads training initiatives within Google to educate employees about human rights, and how they can escalate concerns via the correct channels for further review. In addition, employees who manage relationships with our extended workforce and hardware suppliers are trained on our Supplier Code of Conduct and Supplier Responsibility program. Further, the Anti-Modern-Slavery team provides an anti-modern-slavery training specifically for employees who oversee vendors that a modern slavery assessment identified as high risk. The training covers 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 explains how supplier managers can better understand the risk profile of the suppliers they manage and how to report concerns.

We conduct ongoing human rights due diligence on products, new markets, industries, and specific topics. We identify human rights and environmental risks in our business area through company wide assessments and our complaints mechanisms. We also regularly conduct Environmental, Health and Safety risk assessments to identify and assess risks to the environment and the health and safety of workers, and to assist in prioritizing appropriate control measures.

As part of our risk assessment of Google Germany GmbH's operations under LkSG, we gathered and assessed basic information about Google Germany GmbH's corporate structure, the nature of our business activities, services provided, and the location of our operations. We conducted stakeholder interviews across departments – including Employment Legal, Environmental Health and Safety, Global Security and Resilience Services, People Operations, Public Policy, and Real Estate Workplace Services – to understand how each team identifies and addresses risks covered by LkSG. Through these interviews and a review of policies and procedures provided by these teams we confirmed that the global policies, processes, and controls managed by these teams to identify and address LkSG-related risks apply to Google Germany GmbH. We documented our understanding of these controls and recommended improvements where applicable. Our assessment also incorporated external sources of data, including media stories and information from the Business and Human Rights Resource Centre, the International Labor Organization's List of Goods Produced by Child Labor or Forced Labor, the U.S. Department of State's human rights country reports and Trafficking in Persons reports, and Business for Social Responsibility's reports on sector-specific risks. Additionally, as part of the assessment we reviewed complaints raised by employees of Google Germany GmbH to identify any concerns related to LkSG risk areas.

We did not identify any LkSG-specific risk in our Google Germany GmbH's operations.

Our Supply Chain

We conduct due diligence in our supply chain through our global [Supplier Responsibility](#) program. The program is focused on working with suppliers that treat their workforce with dignity and respect, maintain safe and healthy workplaces, and conduct business ethically in accordance with our Supplier Code of Conduct and relevant laws and regulations.

We continually assess human rights and environmental risk in our supply chains. Our assessments identify higher risk areas of our business based on external reports and standards, country and sector risk profiles, previous assessments, and input from experts in this area. In addition, to assess supplier-specific risk, we consider the industry, work type, geography, and supplier performance against our Supplier Code of Conduct, among other factors. We conduct due diligence on suppliers identified as having higher risk based on the assessments described above (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.

We work with independent third parties to conduct periodic audits of our higher-risk suppliers’ facilities. Our audits include in-depth facility reviews, meetings with management, on-site worker interviews, document reviews, and assessments of ancillary workplace facilities, 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. We also conduct on-site chemical management assessments at suppliers’ facilities to verify the efficacy of chemical hazard controls and help suppliers redesign their processes with safer alternatives.

As the most valuable insights often come from workers themselves, we engage with independent third parties to gather feedback through anonymous worker surveys and individual and group interviews. Workers are invited to share their concerns, including on topics such as working conditions, wages and benefits, working hours, and communication with management.

We investigate any problems identified during audits, and if a supplier is not meeting our expectations, they must provide a corrective action plan that outlines the root cause of the finding, how and when they 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 that all corrective actions are completed in the agreed upon time frame, with a process for escalation to the Supplier Responsibility Steering Committee (chaired by our Chief Compliance Officer) if necessary. We also assess the effectiveness of our actions through ongoing monitoring of suppliers whose audit findings reveal potential human rights risks, regularly reviewing and updating our supply chain implementation guidance, and developing tools to better identify populations at risk of human rights abuses within our supply chain.

Our contracts with suppliers include language requiring compliance with our Supplier Code of Conduct, which is publicly available on our website. We also include extensive anti-modern-slavery contractual language in some supplier contracts.

In addition to the due diligence efforts described above, we conducted an abstract risk assessment of Google Germany GmbH's supply chain to identify suppliers who may be most susceptible to potential or actual risks covered in the LkSG. For this, we reviewed a list of all unique direct suppliers for Google Germany GmbH and assessed them based on sector and country location. The majority of these suppliers, which provide services such as administrative support, advertising and marketing support, legal and consulting services, and janitorial, catering, and security services, among others, are based in Germany or other countries within the European Union.

Our assessment also incorporated the same external data sources that supported our risk assessment of Google Germany GmbH's operations described above. Based on the abstract risk assessment, we identified a subset of suppliers for the concrete risk assessment. For this group, we considered which LkSG risks, if any, these suppliers may be susceptible to based on factors such as higher-risk work practices (e.g., those using temporary labor, contracted labor, or vulnerable populations) and the specific type of service provided to Google Germany GmbH. We then conducted due diligence on these suppliers.

In line with our established due diligence process, we required suppliers to complete an online questionnaire covering the policies, procedures, and controls in place to identify, prevent, and address human rights and environmental risks covered in the LkSG. The questionnaires contained detailed questions regarding policies and practices related to labor and human rights, environment, ethics, and management systems. We followed up with suppliers on their responses as needed. The process also included assessing suppliers based on supplier background checks, examination of labor-related red flags that appear in publicly available databases and media sources, and a review against human trafficking watch lists and sanctions lists. Additionally, as part of the assessment we reviewed complaints raised by the extended workforce of Google Germany GmbH to identify any concerns related to LkSG risk areas.

We identified small and medium-sized construction suppliers as having less mature compliance programs, presenting potential risks under the LkSG. Although these suppliers completed work for Google Germany GmbH prior to the risk analysis, we communicated our expectations regarding the identified potential risk areas and adherence to our Supplier Code of Conduct. To support capability building, we also provided these suppliers with third-party resources and guidance. Furthermore, we have noted these entities for internal monitoring; as such, any potential future engagement is contingent upon them demonstrating compliance with our standards.

5. Addressing Complaints

We have grievance mechanisms at the company and program level. For example, our third-party hosted Helpline enables employees and members of our extended workforce to report actual or suspected incidents of misconduct or violations of our policies or Code of Conduct, including human rights concerns. Individuals who raise concerns or participate in an investigation relating to such concerns are protected against retaliation, and individuals have the option of submitting their concerns anonymously. When we learn about a potential violation of our policies, Code of Conduct, or the law involving our employees or our extended workforce, we carefully investigate and then engage with the relevant stakeholders to make appropriate remedial recommendations. Throughout this process, we keep information, including the identity of the individuals raising the concern, as confidential as possible, sharing only on a need-to-know basis.

In our supply chain, we work with our suppliers to address non-conformances with our Supplier Code of Conduct. Remediation includes, but is not limited to, working with the supplier to develop a corrective action plan that outlines the root cause of the issue, indicates how and when the supplier will resolve the issue, and what steps will be taken to prevent recurrence. If we learn of a human rights violation in our sub-tier supply chain, our approach includes, but is not limited to, working with the supplier in question or one with whom we have leverage, to remediate the issue.

We also participate in multi-stakeholder collaborations and industry groups that focus on addressing systemic risks in the supply chain. These include the [Global Business Coalition Against Human Trafficking](#), the [Responsible Minerals Initiative](#), and the [Public-Private Alliance for Responsible Minerals Trade](#).

6. Documentation and Reporting

We produce several annual disclosures and reports covering our human rights work in our business operations and supply chain.

Since 2016, our Anti-Modern-Slavery team has published an annual [Statement Against Modern Slavery](#) explaining our efforts to ensure that modern slavery is not taking place in our supply chains and business operations. The Statement describes our supply chain, our Anti-Modern Slavery program and its governance, and the policies and processes that help us prevent, identify, assess, and address modern slavery risks, and ensure our efforts are effective.

Since 2017, the Supplier Responsibility team has produced an [annual report](#) outlining our frameworks, tools, and key performance metrics, and key projects completed with suppliers that illustrate the program's success, challenges, and aspirations. To learn more about our approach to supplier responsibility, see [here](#). We also publish an annual [Alphabet Conflict Minerals report](#) that covers our due diligence efforts in our consumer hardware supply chain regarding conflict minerals like tin, tantalum, tungsten, and gold.

We will regularly review and adapt this policy statement, as necessary.

7. Conclusion

Our wide array of products and services means we touch human rights in a wide variety of ways. The programs, processes, and efforts mentioned above serve as a foundation for further in-depth human rights due diligence, in line with our [commitments](#) to human rights. We are committed to continuous improvement and strengthening our approach to respect for human rights.



Paul Manicle, Managing Director, Google Germany GmbH

April 2026