



European Union NFRD Report 2026

Contents

Reporting principles	1
Google’s business model	2
Environmental initiatives	3
Employee matters	7
Social impact	9
Respect for human rights	12
Data ethics	18
Anti-corruption and bribery matters	20
Conclusion	22

Reporting principles

We’re issuing this report pursuant to the European Union (EU) Non-Financial Reporting Directive (NFRD) 2014/95/EU. This report covers the global operations of Google and all its subsidiaries. Google LLC itself is a subsidiary of Alphabet Inc. In 2026, Google Sweden AB, Google Denmark ApS, Dapsi International ApS, and Google Spain SL are each required to report under Directive 2014/95/EU, according to the Swedish Annual Accounts Act (1995:1554) (Sw.Årsredovisningslagen), the Danish Financial Statements Act Section 99a and Section 99d (Årsregnskabsloven), and the Spanish Law 11/2018, which amends Article 49 of the Spanish Commercial Code (Código de Comercio).

This report includes summary information on Google’s environmental initiatives, employee matters, social impact, respect for human rights, data ethics, and anti-corruption and bribery matters. When available, data covers our 2025 fiscal year (January 1 to December 31, 2025). When 2025 data is not yet available, data covers our 2024 fiscal year (January 1 to December 31, 2024).

For the purposes of this report, “we,” “us,” “our,” “the company,” and similar terms refer to Google, unless the context indicates otherwise.

Google's business model

Google's mission, to organize the world's information and make it universally accessible and useful, is as relevant today as it was when we were founded in 1998. Since then, we've evolved from a company that helps people find answers, to a company that also helps people get things done. Google's unconventional spirit has been a driving force, inspiring us to tackle big problems and invest in moonshots, leading us to be a pioneer in the development of artificial intelligence (AI) and, since 2016, an AI-first company.

Google Services' core products and platforms include ads, Android, Chrome, devices, Gmail, Google Drive, Google Gemini, Google Maps, Google Photos, Google Play, Search, and YouTube. Google Services generates revenues primarily by delivering both performance and brand advertising that appears on Google Search and other properties, YouTube, and Google Network partners' properties. In addition, Google Services generates revenues from products and services beyond advertising, including: consumer subscriptions, which primarily include revenues from YouTube services as well as Google One; platforms, which primarily include revenues from Google Play sales of apps and in-app purchases; and devices, which primarily include sales of the Pixel family of devices. Through our Google Cloud Platform and Google Workspace offerings, Google Cloud generates revenues primarily from consumption-based fees and subscriptions for infrastructure, platform, applications, and other cloud services. Google operates in the United States; EMEA (Europe, the Middle East, and Africa); APAC (Asia-Pacific); and Other Americas (Canada and Latin America). We continually innovate and build new products and features to help our users, partners, customers, and communities.

For more information on Google's business model, see [Alphabet's 2025 10-K Report](#).

Environmental initiatives

Since the beginning, Google has worked hard to help build a more sustainable future. For both our operations and our product strategy, we've set near-term ambitions, and used them to challenge us and ensure we continue to innovate.

Governance

The Alphabet Audit Committee and Risk and Compliance Committee have the primary responsibility for the oversight of a number of risks facing our businesses. These committees review and discuss major risk exposures with management, including environmental sustainability-related risks, and the steps that Alphabet takes to prevent, detect, monitor, and actively manage such exposures.

Our Sustainability Focus Area, an internal management team led by our Chief Technologist, Learning and Sustainability, provides centralized management oversight of environmental sustainability and climate-related issues. It includes the Chief Sustainability Officer and executives from across the company with diverse skills, from teams such as operations, products, finance, marketing, legal, communications, and policy, among others. Through the Sustainability Focus Area, environmental sustainability and climate ambitions are built into our company-wide goals, plans of action, management policies, performance objectives, and how we monitor progress.

Risk management

Environmental risks are assessed as part of the company's overall risk management framework. The risks and opportunities identified through this process support public disclosures and inform Google's environmental sustainability strategy. Our Chief Sustainability Officer and sustainability teams work to address risks by identifying opportunities to reduce environmental impacts from the company's operations and value chain, and by improving climate resilience.

We've used qualitative and quantitative risk assessments to identify climate-related risks and opportunities, and understand their potential associated impact. We've aligned our climate risk assessment process closely with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD). We've leveraged the TCFD categories of risks and opportunities and conducted climate scenario analyses.

We've analyzed climate-related risks and opportunities across three time horizons—short term (through 2030), medium term (through 2040), and long term (through 2050)—for financial, operational, legal, and strategic risks. We considered acute and chronic physical risks (e.g., heat stress, water stress, and extreme weather events), as well as risks associated with transitioning to a low-carbon economy (e.g., energy costs, future regulations, and technology). We also assessed climate-related opportunities (e.g., developing low-carbon products and services, improving energy efficiency, and advancing energy technologies).

To identify and assess water-related risks in our direct operations, and opportunities for water stewardship action, Google annually undertakes a water risk assessment of our data centers and offices.

Our environmental strategy

Our environmental strategy has two key pillars, supported by our dedication to accessible information and technological innovation:

- **Our products:** We're empowering people with information about the environmental impacts of their choices.
- **Our operations:** We're working to drive environmental sustainability and efficiency across our operations and value chain.

Our products

We're developing tools and technologies that help people mitigate and adapt to climate change through our products. As an information company, we bring accurate, authoritative information to people to help them make key decisions in their lives, including information about environmental sustainability.

Google provides information to users to help them make more environmentally sustainable choices through our products. We do this by offering environmental sustainability features like fuel-efficient routing in Google Maps and energy savings from Nest thermostats.

We're tackling climate change by focusing on reducing emissions in sectors like energy and transportation, and better predicting extreme weather to lessen its effects. By applying AI and other cutting edge technologies to these problems, we can help enable mitigation, adaptation, and ecosystem protection in ways that were previously impossible to imagine.

Net-zero carbon

At Google, we're deeply committed to responsibly managing the environmental footprint of our operations and unlocking the power of AI for the planet. While the path to achieving our climate ambitions will not be linear—given our AI infrastructure buildout is currently accelerating faster than the grid is decarbonizing—we remain focused on scaling abundant and affordable clean power globally and progressing technological innovations that drive down emissions across our operations and the broader industry.

In 2021, we set an ambition to reach net-zero emissions across all of our operations and value chain by 2030. We aim to reduce over time our absolute, combined Scope 1, Scope 2 (market-based), and Scope 3 emissions by 50% from a 2019 base year, and we plan to invest in a range of carbon removal solutions to neutralize our remaining emissions.

We continue working to optimize energy consumption at our data centers. In 2025, the average annual power usage effectiveness (PUE)¹ for our global fleet of data centers was 1.09, compared with the industry average of 1.54² — meaning that Google data centers used 83% less overhead energy than the industry average. Since 2008, we've consistently lowered our average annual fleet-wide PUE and successfully maintained those gains during periods of rapid growth.

Our primary approach to reducing our Scope 2 emissions is through energy management and the procurement of carbon-free energy (CFE).³ We have an ambition to run on 24/7 CFE—every hour on every grid where we operate—by 2030.

¹ PUE is a standard industry ratio that compares the amount of non-computing overhead energy (used for things like cooling and power distribution) to the amount of energy used to power IT equipment. A PUE of 2.0 means that for every watt of IT power, an additional watt is consumed to cool and distribute power to the IT equipment. A PUE closer to 1.0 means nearly all the energy is used for computing.

² According to the [Uptime Institute's 2025 Global Data Center Survey](#), the global average PUE of respondents' datacenters was 1.54. The overhead energy use comparison was calculated as follows: $(1 - (\text{Google's overhead energy use (0.09)} \div \text{the industry average overhead energy use (0.54)})) \times 100 = 83\%$.

³ Carbon-free energy (CFE) technologies include types of electricity generation that don't directly emit carbon dioxide, including solar, wind, geothermal, hydropower, and nuclear. In addition, when deployed with the appropriate guardrails, low-carbon technologies including sustainable biomass and carbon capture and storage can contribute to a CFE portfolio. Energy storage systems can contribute as well.

Additionally, we're supporting a wide variety of projects around the world designed to counterbalance the warming impact of our remaining emissions. In 2025, we signed 16 deals for roughly 600,000 tCO₂ of carbon removal credits over the coming years, and also contracted for 1 million tCO₂e (GWP100) of superpollutant credits.⁴ This brings our cumulative contracted carbon removal credits portfolio to over 1.3 million tCO₂ as of the end of 2025.

Water stewardship

We aim to replenish more water than we consume and help improve water quality and ecosystem health in the communities where we operate. Data centers generate heat and often use water as a highly efficient means of cooling that requires less energy than air-cooling technologies.

Our water stewardship strategy is centered on advancing responsible water use across our operations, supporting watershed health where we operate, and supporting water security with technology. In 2021, we announced our ambition to replenish 120% of the freshwater⁵ volume we consume, on average, across our offices and data centers by 2030. For details on the water stewardship projects we've supported as of the end of 2025, refer to the [2026 Google Water Stewardship Project Portfolio](#).

Waste reduction

We aim to maximize the reuse of finite resources across our operations, products, and supply chains. Our circularity principles focus on designing for circularity and safer chemistry, maximizing value—prioritizing circular operations that recover, repair, and redeploy products and materials, and empowering others to participate in the circular economy through our technology and partnerships.

Nature and biodiversity

We strive to restore and enhance nature and biodiversity through an approach that starts with designing our offices and campuses for ecology and actively managing our sites to maintain healthy ecosystems. This includes developing guidelines for urban nature and increasing habitat creation, restoration, and monitoring.

⁴ This includes superpollutant elimination projects that we contracted for in 2025 to complement our carbon removal credits. We report these credits in separate categories because the climate impact of superpollutant credits is often shorter-lived than carbon dioxide removal credits.

⁵ We define freshwater as naturally occurring water from surface or groundwater sources that isn't salty, and is suitable for consumption if clean or processed. Freshwater excludes seawater and reclaimed wastewater.

For more information about our environmental sustainability initiatives, metrics and related methodologies, see the Reports section of our [sustainability site](#).

Employee matters

Talent attraction and retention

Our people are critical for our continued success, so we work hard to create an environment where employees can have fulfilling careers, and perform at a high level. We rely on highly skilled personnel and, if we're unable to retain or motivate key personnel, hire qualified personnel, or maintain and continue to adapt our corporate culture, we may not be able to grow or operate effectively.

We offer industry-leading benefits and programs to take care of the varied needs of our employees and their families, including opportunities for career growth and development, resources to support their financial health, and access to excellent healthcare choices.

For example, new parents, regardless of gender, receive a minimum of 18 weeks of fully paid leave to bond with their child (birth parents receive an additional six weeks of pregnancy recovery time). In addition, all new parents globally benefit from a two-week gradual return policy (ramping back to work part-time at a full-time salary) and can choose flexible working options, such as part-time working, job sharing, and extended work from home for 90 days. We provide rooms in every office for nursing parents, equipped with breast pumps and refrigerators. Parents and caregivers are also able to use 20 days of backup care (refreshed each year) when their regular care isn't available. Google also offers up to 8 weeks carers leave to support seriously ill loved ones.

Our competitive compensation programs help us to attract and retain top candidates, and we'll continue to invest in recruiting talented people for technical and non-technical roles, and rewarding them well. We provide certain perks that make life and work more convenient, design compelling job opportunities aligned with our mission, and create a fun and energizing work environment. We build our offices with the goal of providing our employees with a first-rate workplace, and we engage in a process of continuous re-evaluation of design and functionality to better meet their needs. We've always been committed to creating a workplace where we hire the best people wherever we operate, and an environment where everyone can thrive with fair treatment and equal opportunity to advance. Our users come from around the world, and we serve them better when our employees do too.

Culture and development

At Google, our vibrant and dynamic culture is fundamental to how we approach our work and empower our employees. We believe that fostering an environment of collaboration and innovation is not just beneficial, but essential for attracting and retaining the talent needed to build products that improve the lives of millions. We're proud to support the Employee Resource Groups (ERGs) that provide meaningful communities for employees of all backgrounds and perspectives. Collectively, more than 60,000 employees across 52 countries actively participate as members of our 17 ERGs. The Women@Google ERG is our largest network and has 120 global chapters led by volunteers who support our culture and build community. These Googler-initiated networks are passionate about helping all employees thrive at Google.

Managers at Google are instrumental in shaping the employee experience and enabling all Googlers to do their best work. As such, we provide a variety of high-quality training and support to build and strengthen their capabilities—ranging from courses for new managers to learning resources that help them provide feedback and manage performance, as well as coaching and individual support.

We aim to empower employees to act on great ideas regardless of their role or function within the company, and we provide training that helps them develop the skills to do so. We have several e-learning curricula and conduct “Googler-to-Googler” training sessions, where people learn new skills from their colleagues. Google subsidizes outside studies related to an employee's job responsibilities and—because we believe that fostering curiosity is key to success—also for employees to engage in external training unrelated to their function.

Googlers are invited to share their feedback about their overall workplace experience through a brief weekly survey sent to all employees. Aggregated results are accessible to leaders and relevant decision-makers throughout the year, and shared with all Googlers semiannually. The results are used to identify ways to improve the employee experience, drive leader actions, and inform business priorities.

Working conditions

Google's [Code of Conduct](#) provides a guide on how our employees are expected to put Google's values into practice as they pursue the company's mission. This includes respect for one another and for our users. Employees are expected to create and preserve a workplace culture that's free of harassment, intimidation, and unlawful discrimination. Our employees at all levels of the organization, and

members of our extended workforce, are required to complete our Code of Conduct training on a biennial basis.

In an effort to accelerate our commitments to build a workplace where everyone can do their best work, we provide transparency into Googlers' concerns and how we handle them, and we offer support for people who raise concerns. Our Internal Investigations Report includes a section that provides detail about internal sexual harassment investigations and our Internal Investigations Practice Guide includes expanded sexual harassment scenarios that reflect examples of the types of conduct that may result in termination of employment. We also publicly share our [Policy on Harassment, Discrimination, Retaliation, Standards of Conduct, and Workplace Concerns](#), which includes our processes and channels for raising and investigating concerns. A global Investigations Care team, the Employee Assistance Program, workplace accommodations, and time off are all options available to Googlers who may need them.

The Alphabet Board oversees the effectiveness of our sexual harassment and retaliation prevention programs and any proposed changes, and we conduct reviews annually to make sure our workplace commitments are operating effectively and as intended.

Our guiding principles remain foundational to our work, and we're committed to continuing to make progress.

Social impact

Our mission—to organize the world's information and make it universally accessible and useful—requires us to design, create, and build for everyone, every day.

In addition to building products for everyone, we're also ensuring that everyone is able to participate in the digital economy by working with external partners to provide digital skills training for all. For example, the [Grow with Google](#) program helps people find jobs and grow their business and career. We offer training programs on topics ranging from basic online and AI skills, like how to use AI to grow your business or how to reach customers with email more efficiently, to more advanced topics. Google [Career Certificates](#), a program we launched in 2018, is focused on equipping people with job-ready skills in fields like cybersecurity, data analytics, information technology (IT) support, project management, digital marketing, and user experience (UX) design within three to six months, with no degree or experience required. Based on U.S. survey responses, 75%+ of program graduates report a positive career impact within six months of certificate completion.

Google has also launched an [AI Professional Certificate](#) to build AI fluency so workers can get more done, faster. The certificate takes you beyond foundational understanding to becoming AI-fluent with 20 hands-on activities. Designed by Google experts, this program gets you hands-on experience to get AI skills that employers are looking for.

Our dedication to universal product development also extends to our approach to AI development. We believe AI can positively impact the world when developed responsibly. Our research and products, focused on maximizing its benefits while mitigating potential risks, are already helping people with everyday tasks and ambitious projects. Our journey began in 2001, when machine learning was first incorporated into Google Search to suggest better spellings to users searching the web. Today, AI in our products is used by billions of people globally through features like AI Overviews, which has over 2 billion monthly users across more than 200 countries and territories and 40 languages alone.

As models grow even more sophisticated, we see users and businesses around the globe transitioning from exploration to integration, finding new ways to put these tools to work in their daily lives. From foundational advances in [scientific discovery](#) and [clinical milestones in healthcare](#) to the rise of agentic systems and new tools to support creativity such as 'vibe coding' and generative media, the transformational potential of these tools is coming more clearly into focus. Working alongside our partners, we take a comprehensive and responsible approach to AI development that enables our most advanced models to be applied where they can have the greatest positive impact.

We are fostering a new golden age of discovery by applying AI to fundamental sciences. This includes [advancing nuclear fusion research](#) and utilizing [quantum computing](#) to solve problems that were previously intractable. We are driving progress in [genomics](#) and [disease detection](#), [automating administrative burden](#) for clinicians, and partnering with institutions like Yale University to discover new potential [cancer therapy pathways](#). Through AI tools like [AlphaFold](#), which predicts protein structures, we are accelerating our understanding of disease — enabling drug discovery and opening new frontiers in diagnostics and treatment.

We are strengthening global resilience by providing responsible agencies with experimental tools that give earlier warning for [floods](#), [cyclones](#), and [earthquakes](#). When used, these tools can help communities prepare for and respond to disasters more effectively. Beyond crisis resilience, we are applying AI to high-accuracy [weather forecasting](#) and identifying techniques for sustainable [agriculture](#), helping society adapt to the realities of a changing climate.

We are committed to [empowering every learner](#). AI is transforming education by supporting teachers and personalizing learning experiences. Through initiatives focused on [AI literacy](#) and [learning](#), and technologies like [LearnLM](#), we are helping to unlock human potential and make knowledge universally accessible.

[Google.org](#), Google's philanthropy, is focused on applying Google's innovation, research, and resources to promote progress and expand opportunity for everyone. Google.org's support of nonprofits, civic entities and academic institutions can help accelerate their progress by connecting them with a unique blend of support that includes funding, products, and technical expertise from Google employees.

In 2025, we launched Google.org's [guiding principles](#) which have framed how we lead to achieve maximum impact for the greatest good. We focus on funding technology by supporting organizations as they embed AI and advanced tools into their core operations, transforming their capabilities and making technology fundamental to accelerating their mission. Understanding that the world's most daunting challenges require ecosystem-level solutions, we fund together, enabling co-funded projects to tackle issues that no single entity could resolve alone. Finally, we fund for the future by maintaining a careful balance between immediate, short-term support and long-term investments in innovative solutions that hold the potential for sustainable, systemic change.

Google.org also launched "[AI Works for Europe](#)," an initiative to help workers and students gain essential AI skills through partnerships with the public sector, nonprofits, and universities. This includes a \$30 million commitment to the European AI Opportunity Fund and resources for foundational skills. In collaboration with [INCO](#) and [Chance](#), the [NewFutures:AI](#) program was created to provide career support and practical training for final-year students at over 50 European higher education institutions. This curriculum specifically targets sectors identified by [INCO's research](#) as increasingly requiring AI proficiency, including information and communications technology (ICT), logistics, and finance. By analyzing 31 million job postings, the research found that 24% of entry-level positions in the United Kingdom (UK) and EU now call for AI-related skills.

Google.org and YouTube [launched](#) a first-of-its-kind \$20M strategic global initiative to address teen digital wellbeing. This funding powers foundational research, a multilingual content hub, creator-led campaigns, and nonprofit activation to bring resources to young people and their trusted adults.

Building on the "[AI Collaboratives](#)" initiative, Google.org formalized a systems-level approach to catalyze society-centered AI innovation across the scientific continuum. We expanded our portfolio to include

new Collaboratives, while scaling existing efforts in Food Security and Wildfire prevention. Google.org will continue to provide multifaceted support, including funding, engagement with Google Research, Google DeepMind and other technical teams, in-person workshops, and new research, which brings together varied organizations to collaborate on AI-powered solutions.

In 2025, Google.org also [committed](#) \$20M as part of our inaugural AI for Science Fund to 12 projects using AI to tackle some of the world's most complex scientific challenges. Building on the momentum, in 2026 we [launched](#) the Google.org Impact Challenge: AI for Science. This \$30 million global initiative builds on our inaugural AI for Science fund to accelerate Nobel-level breakthroughs in Health, Climate Resilience, and Environmental Science. Across these efforts that include catalytic funding and pro bono technical mentorship, we aim to bridge the gap between AI research and real-world application across the EU.

To help more social impact organizations take advantage of AI-powered tools, since 2002, [Google.org](#) has provided more than \$19 billion in donated products, deep research support, and cutting-edge educational programs to thousands of nonprofits, universities and educators around the world.

Respect for human rights

At Alphabet, we're guided by internationally recognized human rights standards. We have a longstanding commitment to respecting the rights enshrined in the [Universal Declaration of Human Rights](#) and its implementing treaties, as well as upholding the standards established in the [United Nations Guiding Principles on Business and Human Rights](#) (UNGPs), and in the [Global Network Initiative \(GNI\) Principles](#).

Our products and services

Our work on civil rights and human rights is conducted through our Human Rights Program. Dedicated personnel covering product, regional, and functional areas are responsible for the day-to-day operations of protecting our users and ensuring compliance with legal requirements. Senior management develops the strategy and oversees the implementation of civil and human rights commitments and GNI Principles at Google, and provides relevant updates to the members of the Risk and Compliance Committee of Alphabet's Board of Directors. The Risk and Compliance Committee also provides pertinent reports to the full Board of Directors. Our Human Rights Executive Council (HREC) provides oversight and guidance across Google's human rights efforts and ensures issues are being addressed consistently. The Council is

composed of senior leaders across relevant product areas and functions, and 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.

We believe restrictions on the freedom of expression should be consistent with international human rights laws and standards, adhering to principles of legality, legitimacy, necessity, and proportionality. We also believe that laws addressing government surveillance of user information should be [narrowly tailored, transparent, and subject to oversight](#). We publish [Transparency Reports](#), with the mission of sharing data that sheds light on how the policies and actions of governments and corporations affect privacy, security, and access to information online, and how Google works - from the way we respond to government requests to how we handle content moderation across our products and services.

Partnership across industry and with civil society is a key component of our approach to respecting human rights in the digital space. We're founding members of GNI, a multi-stakeholder nongovernmental organization working to advance free expression and privacy. The GNI Principles are informed by the UN Guiding Principles on Business and Human Rights, and they concretize information and communication technology companies' responsibility to respect and protect the freedom of expression and privacy rights of their users. As part of GNI, we work to support and promote human rights, including through improved responsible decision making, shared learning, and multi-stakeholder collaboration. As a GNI member, Google is subject to a periodic assessment by an independent party to review how we integrate GNI Principles into our governance, due diligence, risk management, and operational practices. Based on this assessment, the GNI Board determines and states publicly whether sufficient efforts have been made to implement the GNI Principles. In 2023, GNI published the results of our fourth assessment, and determined that we're making good-faith efforts to implement the [GNI Principles](#) with improvement over time, while the fifth assessment is currently ongoing.

More information on our human rights commitments can be found at [Google: Human Rights](#).

Human rights and emerging technology

We believe our approach to AI must be both bold and responsible. Bold in rapidly innovating and deploying AI in groundbreaking products used by and benefiting people everywhere, contributing to scientific advances that deepen our understanding of the world, and helping humanity address its most pressing challenges and opportunities; and responsible in developing and deploying AI that addresses both user needs and

broader responsibilities, while safeguarding user safety, security, and privacy.

Because we understand that AI, as a still-emerging transformative technology, poses evolving complexities and risks, we pursue AI responsibly throughout the AI development and deployment lifecycle, from design to testing to deployment to iteration, learning as AI advances and uses evolve. This includes implementing appropriate human oversight, due diligence, and feedback mechanisms to align with user goals, social responsibility, and widely accepted principles of international law and human rights.

In February 2026, we published our most recent [Responsible AI Progress Report](#), which details our multi-layered approach to responsible AI governance, and focuses in particular on agentic and frontier risks from increasingly sophisticated models. The report also shows how our systems are built to be able to detect and then adapt to emerging risks. Whether we are hardening agentic systems against adversarial manipulation or embedding provenance signals across Google's AI generated content, our goal remains clear: to ensure that we are “bold” and “responsible” in both our development and implementation. Building trust in these tools also requires deep partnership with governments, academics and civil society. As AI advances, we'll continue to iterate and share research and tools with the broader ecosystem, with a goal to promote uses of AI that will improve lives everywhere.

Human rights in our operations

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 of Conduct also requires that employees and members of the extended workforce comply with all applicable laws, including those protecting human rights, preventing modern slavery, and prohibiting discrimination, harassment, and retaliation.

We're 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've 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. We train our employees and members of our extended workforce on the Code of Conduct. The employee training, for example, includes instruction on performing due diligence to identify and avoid working with third parties that engage in modern slavery or other illegal practices.

Please see our “Employee matters” section for a description of our efforts to respect workforce-related human rights.

Human rights in our supply chain

We're committed to working with suppliers who treat the people in their workforce with dignity and respect, maintain safe and healthy workplaces, and conduct business ethically in accordance with our [Supplier Code of Conduct](#) (SCOC), as well as relevant laws and regulations.

The foundation for our supplier responsibility efforts is our SCOC, which sets forth supplier expectations designed to protect the health, safety, and treatment of workers in our supply chain. The SCOC is aligned with the Responsible Business Alliance (RBA) Code of Conduct; international standards such as the UNGPs, ILO International Labour Standards, the Universal Declaration of Human Rights; and our own values and commitment to continuous improvement. Our [Policy Against Modern Slavery](#) defines modern slavery and provides a concrete list of prohibited actions, as well as guidance on how to address suspected instances of modern slavery. Our annual [Statement Against Modern Slavery](#), which provides more detail on our efforts to prevent, identify, and address modern slavery in our supply chains and business operations, can be found on our [Supplier Responsibility](#) page.

We expect our suppliers to source only from conflict-free smelters, such as those that are compliant with the Responsible Minerals Initiative's Responsible Minerals Assurance Process assessment protocols, and to work with their own suppliers to achieve conflict-free sourcing. 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 believe that certain risk factors contribute to human rights risk in electronics supply chains. These factors include, but are not limited to, working with suppliers that: operate in countries where human rights risks are prevalent, subcontract work, hire foreign migrant workers, or are associated with raw material extraction, hardware manufacturing, and certain indirect services (e.g., food services, janitorial services, and security providers).

We assess supplier and site-specific risks through our Supplier Risk Assessment (SRA). Through the SRA, we evaluate risks associated with industry, product or service type, and geography. Our assessment also incorporates findings from supplier background checks, which include identifying labor-related red flags that appear in publicly available databases and media sources, and screening suppliers' names against

human trafficking watch lists and sanctions lists. In addition, we consider the strategic significance of the supplier and their historical audit performance. Finally, we evaluate a supplier's responses to a self-assessment questionnaire, which covers topics in our SCOC, including human rights and labor practices and management systems. In certain cases, we use an independent evaluation of a supplier's working conditions and management systems in lieu of a questionnaire. Findings from the initial SRA and self-assessment questionnaire (or equivalent independent evaluation) determine whether we conduct additional assessments at suppliers' facilities.

We conduct due diligence on a continuous basis to assess suppliers for social, environmental and ethical risks. Our due diligence process involves close collaboration with suppliers to resolve issues identified through the supplier self-assessment questionnaire (or equivalent independent evaluation) and on-site audits. In addition, if we discover red flags through our supplier background checks, we conduct extensive and documented follow-ups with the supplier 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.

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.

We work with independent audit firms 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 SCOC, including human rights risk. We investigate any issues identified during the audit, and when we find that a supplier is not conforming to our expectations, we expect the supplier to provide a corrective action plan (CAP) that outlines the root cause of the finding, how and when the supplier will resolve the issue, and what steps will be taken to prevent recurrence. A CAP is considered acceptable only if it resolves the issue and addresses the root cause of the non-conformance. We monitor and verify all corrective actions are completed in the agreed upon time frame.

In addition to Google-commissioned independent audits described above, we recognize RBA's Validated Assessment Program (VAP) audits. Integrating VAP audits into our strategy enables us to promote industry-wide efforts and reduce audit fatigue. To maintain our high standards, we review the VAP findings and apply additional oversight to

ensure that CAP management aligns with our expectations. In 2025, our suppliers underwent 236 on-site audits, including VAP audits. Please refer to our [Supplier Responsibility Report](#) for more information on the audit process, common non-conformance findings, corrective actions, and more.

Our global Supplier Responsibility and Anti-Modern-Slavery programs are overseen by a dedicated global lead and specialized teams within our Risk, Compliance and Integrity (RCI) organization. We use a cross-functional governance model in which RCI Supplier Responsibility collaborates closely with Supplier Responsibility teams embedded within specific product areas. This structure ensures that our standards are applied consistently across the company while remaining tailored to the unique operational context of our product areas. Our Supplier Responsibility program is committed to ensuring Google works with suppliers who treat the people in their workforce with dignity and respect, maintain safe and healthy workplaces, and conduct business ethically in accordance with our SCOC, as well as relevant laws and regulations. While we work worldwide with suppliers that support our business and operations, we take a risk-based approach and focus our on-site assessments on our hardware manufacturing, logistics, and extended workforce suppliers. Our Anti-Modern-Slavery program addresses modern slavery risks in the company's supply chains and business operations. Our Chief Compliance Officer (CCO), who leads the RCI organization, maintains oversight of the Anti-Modern-Slavery and Supplier Responsibility programs. In 2025, our CCO provided relevant updates to the Risk and Compliance Committee of Alphabet's Board of Directors on an as-needed basis.

Consistent with prior years, our global lead for Anti-Modern-Slavery and Supplier Responsibility provided an update on the status of the Supplier Responsibility program—which includes addressing modern slavery risks—to the Supplier Responsibility Steering Committee, which is composed of senior leaders from our data center, hardware, and extended workforce business areas.

Employees who manage hardware suppliers are required to complete an online training course on our SCOC and Supplier Responsibility program. Employees who manage our extended workforce have the option to complete an online training course on our SCOC. Both courses include guidance on indicators of modern slavery as well as how to report concerns. We also promote awareness of our Supplier Responsibility program through a dedicated internal website accessible to all employees. This portal hosts resources—including a program overview, training modules, reports, and relevant policies and standards, such as our SCOC and Policy Against Modern Slavery.

We continue to deploy an online modern slavery training course for supplier managers. This training covers modern slavery indicators prevalent in industries pertinent to our supplier base, worker populations that are most vulnerable, sample risk scenarios, and how to report concerns. The training also addresses the evolving regulatory landscape around modern slavery and provides sample questions for supplier managers to ask suppliers at various stages of engagement.

For the fourth consecutive year, we hosted Supplier Responsibility summits. These convenings focused on training and equipping our higher risk suppliers with tools to mitigate potential risks in their own operations and supply chains, including risks of modern slavery. In 2025, we welcomed 1,112 participants—a 15% increase from 2024.

We remain committed to improving our efforts to address modern slavery risks in our business and supply chains. In the next year, we plan to:

- Continue to expand our efforts to map our sub-tier technical and consumer hardware supply chain to better identify and address modern slavery risks.
- Continue to educate our suppliers on modern slavery risks, including through the dissemination of Global Business Coalition Against Human Trafficking's resources.

Data ethics

Ensuring proper use of our platforms and protecting the data privacy and security of our users is fundamental to maintaining users' trust and to ensuring our long-term business success. Our Risk and Compliance Committee has specific oversight of data privacy and security matters.

We have a longstanding commitment to promoting transparency; we provide detailed reporting at the company level and, where applicable, the individual business level, including:

- The [Google Transparency Report website](#), where we share reports and data that shed light on how the policies and actions of governments and corporations affect privacy, security, and access to information online, and how Google works - from the way we respond to government requests to how we handle content moderation across our products and services.
- Our [Ads Safety Report](#), where we share the progress made in enforcing Ads and Publisher policies.
- Our [YouTube Community Guidelines enforcement report](#), which we release on a quarterly basis. It provides data on the flags YouTube receives and how we enforce our policies.

We outline how we safeguard privacy and security on our [safety site](#) and give users control over their information through their [Google Account](#). We regularly update and improve our [Privacy Policy](#), making it easier to understand, adding informative videos that explain our practices, and embedding key privacy controls directly in the text. The privacy and security settings in Google Accounts ensure users can easily see their data and set their preferences for how Google should store and use their information, including pausing or deleting Search or YouTube history or disabling personalized ads and Search results.

Google has a long-standing commitment to users being able to export and control their data. For over 15 years, it has been providing free tools that allow for easy user data portability. We have developed both user-facing solutions (Takeout) and are a founding member of the Data Transfer Project (now the Data Transfer Initiative) with the objective of enabling service-to-service portability. Takeout allows users and businesses to easily download their data from many commonly used Google platforms, in machine readable formats (allowing for the easy upload of such data to third-party service providers). Google has continuously iterated on Takeout, expanding the datasets and services that are integrated and improving the intuitive user controls.

In 2019, we introduced [auto-delete controls](#), which give users the choice to have Google automatically and continuously delete their data, including Google Maps Timeline data, search, voice, and YouTube activity data after 3 months or 18 months. In 2020, we made auto-delete the default for our core activity settings and announced [updates](#) to many of our privacy tools, including Google Account controls directly from Search, easier access to Incognito mode, and more proactive privacy controls. In 2022, we launched My Ad Center which helps people control the kinds of ads they see across Google on Search, YouTube, and Discover. It also allows them to limit ads from sensitive categories and learn more about the information used to personalize their ad experience. My Ad Center builds on our core privacy principles by giving users the ability to see and control what information is used to personalize the ads they see.

In 2021, we rolled out [end-to-end encrypted calling](#) between Android phones on Google Fi, and new and stronger safe browsing for Chat. In 2023, we announced changes to Location History (now called Google Maps Timeline) and updates to user controls, including, for those who have opted into Google Maps Timeline, Timeline data is now saved directly on a user's device, giving them even more control over their data. For Gemini Apps, we maintain the [Gemini Apps Privacy Hub](#), which is available via our [Gemini Apps Help Center](#) and linked from the Gemini Apps user interface. The Gemini Apps Privacy Hub provides information on how Gemini works, how it collects data, users' rights, how users can

exercise these rights, centralized access to relevant privacy-related disclosures and more.

We make it a priority to protect the privacy and security of our products, users, and customers. We do this by continuously investing in and building products that are secure by default; by strictly upholding responsible data practices that emphasize privacy by design and user choice; and by building easy-to-use settings that put people in control. We're continually enhancing these efforts, whether by enabling users to auto-delete their data, giving them tools, such as My Ad Center, to control their ad experience, or advancing anti-malware, anti-phishing, and password security features. We continue to develop and improve these and other tools to make them more robust and intuitive.

Anti-corruption and bribery matters

Google recognizes that corruption adversely impacts economic growth and disproportionately harms the most vulnerable people and communities around the world.

As with our modern slavery efforts, Google's Chief Compliance Officer oversees a team dedicated to preventing corruption in the company's business operations and supply chain. The Chief Compliance Officer provides relevant updates to the Trust & Compliance Council, as well as the Risk and Compliance Committee of Alphabet's Board of Directors.

Google's Code of Conduct requires compliance with anti-bribery laws, such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act 2010. We also have an Anti-Bribery and Government Ethics Policy, which prohibits bribery and facilitation payments in our business operations, and requires legal pre-approvals for certain types of government-related expenses. A Google employee, contractor, service provider, supplier, or vendor who directly or indirectly gives, offers, or promises anything of value to anyone, including government officials, with the corrupt intent to obtain or retain any improper advantage, will be disciplined up to and including termination of employment or business relationship.

As with other companies in our industry, working with third parties and intermediaries poses potential bribery and corruption risks. We continually strive to assess bribery and corruption risks in all facets of our business and we undertake a number of efforts to mitigate these risks both in our company's operations as well as in our supply chain. Below are a few key examples:

- We maintain an anti-bribery third-party due diligence program, where we conduct documented, risk-based due diligence pertaining to the engagement of third parties and channel partners.
- We routinely inform business partners of Google's commitment to abide by anti-bribery laws and seek a reciprocal commitment from them by including anti-corruption compliance language in our contracts.
- We strive to provide risk-based anti-bribery training for employees in relevant functions at all levels of the company. Our Code of Conduct training, which all employees and members of our extended workforce are required to complete on a biennial basis, contains an anti-bribery module. We also periodically supplement our online training with live instruction. In 2025, Google had a Code of Conduct training compliance rate of 98.25% and an anti-corruption training compliance rate of 97.19%.
- We conduct periodic reviews of the anti-bribery compliance program, taking into account relevant developments in the business and field, as well as evolving international and industry standards.
- We conduct periodic and documented testing of relevant controls and sampling of high-risk transactions.
- We implement appropriate processes and due diligence procedures to analyze potential bribery risks associated with proposed mergers and acquisitions, joint ventures, investments, and consortia.
- Finally, as previously mentioned, we maintain multiple reporting channels whereby employees can raise questions or concerns about the Code of Conduct or our anti-bribery policy and report suspected violations.

Google Payment entities maintain effective compliance programs with appropriate governance. We also have policies and procedures to implement a risk-based Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Program designed to prevent Google from being used to facilitate money laundering and finance terrorist activities. These policies ensure compliance with the Bank Secrecy Act (BSA), EU Money Laundering Directives, the Office of Foreign Assets Control (OFAC), and other applicable legal and regulatory obligations. Program requirements include applicable training, internal controls, independent reviews, and designated officers. In 2025, the BSA/AML and Sanctions training completion rate was 100%.

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. This is more than accurate reporting of our financials, though that's certainly important. Each person at Google—not just those in Finance—has a role in making sure that money is appropriately spent,

our financial records are complete and accurate, and internal controls are honored. To make sure that we get this right, Google maintains a system of internal controls to reinforce our compliance with legal, accounting, tax, and other regulatory requirements in every location in which we operate.

Conclusion

In their [first letter to shareholders](#), our founders wrote that “Google is not a conventional company. We do not intend to become one,” and highlighted Google’s goal to “develop services that significantly improve the lives of as many people as possible.” That unconventional spirit has been a driving force throughout our history, inspiring us to tackle big problems and invest in moonshots.

This vision continues to guide all of us at Google. We believe in technology’s power and potential to have a profoundly positive impact across the world. There’s much work that remains to be done, and we’ll continually strive to achieve this objective.