



# European Union NFRD Report 2021

# Contents

1	<b>Reporting principles</b>
2	<b>Google's business model</b>
2	<b>Environmental initiatives</b>
4	<b>Employee matters</b>
6	<b>Social impact</b>
8	<b>Respect of human rights</b>
13	<b>Anti-corruption and bribery matters</b>
15	<b>Conclusion</b>

## Reporting principles

We are 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 wholly owned subsidiary of Alphabet Inc. In 2021, Google Sweden AB—a Swedish limited liability company—is the only entity required to report under Directive 2014/95/EU, according to the Swedish Annual Accounts Act (1995:1554) (Sw.Årsredovisningslagen).

This report includes summary information on Google's environmental initiatives, employee matters, social impact, respect of human rights, and anti-corruption and bribery matters. When available, such as for diversity and inclusion data, data covers our 2020 fiscal year (January 1 to December 31, 2020). When 2020 data is not yet available, such as for most of our environmental data, data covers our 2019 fiscal year (January 1 to December 31, 2019).

For more detailed information on any of these topics, see Google's [Commitments page](#), which highlights our work across five areas: Protecting users, Expanding opportunity, Including all voices, Responding to crises, and Advancing sustainability. Our [Reports database](#) contains our public reports pertaining to each of these five areas. Additional information about our commitment to corporate responsibility can be found on [Alphabet's Investor Relations page](#).

# Google's business model

Google's mission is to organize the world's information and make it universally accessible and useful. Alphabet is a collection of businesses—the largest of which is Google—which we report as two segments: Google Services and Google Cloud.

Our Google Services and Google Cloud segments together represented approximately 99% of our consolidated revenues in 2020. Our Google Services segment generates revenues primarily by delivering both performance advertising and brand advertising. We continue to look to the future and are making long-term investments that will grow revenues beyond advertising, including Google Play, hardware, and YouTube non-advertising services. Our Google Cloud segment generates revenues primarily from fees received for Google Cloud Platform services and Google Workspace collaboration tools.

For more information on Google's business model, see [Alphabet's 2020 Annual Report](#).

# Environmental initiatives

Climate change is one of the most significant global challenges of our time, and we've long been committed to improving our energy consumption. Operating Google's business in an environmentally sustainable way has been a core value since our founding.

We're focused on tackling our energy consumption through a threefold strategy for carbon neutrality. First, we work to reduce our total energy consumption by pursuing aggressive energy efficiency initiatives. Second, we match 100% of the electricity consumption of our operations with purchases of renewable energy; we're the largest annual corporate purchaser of renewable energy in the world. Third, we buy high-quality carbon offsets for any remaining emissions we haven't yet eliminated.

Google has been carbon neutral since 2007, and in 2020, we purchased enough renewable energy to match 100% of the electricity we consumed for our global operations for the fourth consecutive year. From 2010 to 2019, Google has signed more than 50 power purchase agreements totaling more than 5 gigawatts of renewable energy that is new to the grid, representing a commitment of approximately \$4 billion through 2034. These deals have resulted in over \$7 billion in investments in renewable energy projects across the globe. We have agreements in place to purchase energy from four continents.

In 2020, building on what we'd learned and due to the transformation underway in the global energy system, we set a new goal: By 2030 we aim to run our business on carbon-free energy everywhere, at all times. This means that we will evolve from matching our annual energy consumption with renewable energy to sourcing round-the-clock carbon-free energy.

Google's data centers are the heart of our company, powering products like Search, Gmail, and YouTube for billions of people around the world, 24/7. For more than a decade, we've worked to make Google data centers more efficient and have striven to improve their environmental performance even as demand for our products has dramatically risen. On average, a Google data center is twice as energy efficient as a typical enterprise data center. In 2020, the average annual PUE (power usage effectiveness) for our global fleet of data centers was 1.10, compared with the [industry average of 1.59](#)—meaning that Google data centers use about six times less overhead energy for every unit of IT equipment energy.

At Google, just as we focus on users in designing our products, we focus on our employees in creating healthy workplaces, from our San Francisco Bay Area headquarters to Google offices at diverse sites in more than 170 cities around the world. At the end of 2019, over 1.4 million square meters (15 million square feet) of Google office facilities had achieved Leadership in Energy and Environmental Design (LEED) certification.

We also put Google technology to work helping others study and respond to environmental challenges. We're working with numerous research and nonprofit organizations to map the world's forests, oceans, watersheds, and air quality, then helping to get that information into the hands of decision-makers. We do this by working with partners to build tools like Global Forest Watch, Global Fishing Watch, Project Sunroof, Project Air View, Global Surface Water Explorer, Freshwater Ecosystems Explorer, and the DiSARM platform for malaria risk mapping.

Through Google.org, we've funded numerous initiatives and organizations to support climate action, access to clean energy, and conservation. For example, in 2020, we launched the [Google.org Impact Challenge on Climate](#), which commits €10 million to fund bold ideas that aim to use technology to accelerate Europe's progress toward a greener, more resilient future.

The highest level of direct responsibility for climate change rests with the Senior Vice President and Chief Financial Officer of Alphabet and Google, who is responsible for overseeing climate-related issues as she has visibility across all of the company's operations. The [Audit and Compliance Committee](#) of Alphabet's Board of Directors oversees and monitors Alphabet's major risk exposures, including financial, operational, data privacy and security, competition, legal, regulatory, compliance, civil and human rights, sustainability, and reputational risks, and the steps Alphabet takes to prevent, detect, monitor, and actively manage such exposures. Primary responsibility for managing climate-related issues is delegated to our Google Sustainability Officer, who leads sustainability across Google's worldwide operations, products and supply chain and ensures alignment of our climate strategy across different business units.

For more information about our environmental sustainability initiatives, risk assessments, and key performance indicators, see our [2020 Environmental Report](#) and our [2020 CDP Climate Change Response](#). Alphabet has earned a position on CDP's Climate Change A List, which recognizes leadership on climate action and transparency, for seven consecutive years.

## Employee matters

We recognize that our employees are our best assets and critical to our continued success. We invest heavily in hiring talented individuals, and we seek to hire people with diverse backgrounds and perspectives.

Google's [Code of Conduct](#) provides a guide as to 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 is free of harassment, intimidation, bias, and unlawful discrimination. Code of Conduct training is provided to all Google employees at all levels of the organization, and we offer unconscious bias training.

In an effort to accelerate our commitments to be a representative, equitable, and respectful workplace, we are increasing transparency around Googlers' concerns and how we handle them, as well as increasing support for people who raise concerns. In 2019, we updated our Internal Investigations Report to include a section that provides detail about internal sexual harassment investigations as well as expanded sexual harassment scenarios that reflect examples of the types of conduct that may result in termination of employment. In 2019, we also publicly shared our [Policy on Harassment, Discrimination, Retaliation, Standards of Conduct, and Workplace Concerns](#), as well as our processes and channels for raising and investigating concerns.

In 2020, we announced [new workplace commitments](#) that continue to build on our efforts to handle concerns with care and foster respect in the workplace. This reflects the Alphabet Board's agreement on a series of industry-leading principles and improvements that incorporated input from both employees and stockholders, including the creation of a new Diversity, Equity, and Inclusion (DEI) Advisory Council, which comprises internal senior executives and external DEI experts. The Board also will review the effectiveness of our sexual harassment and retaliation prevention programs and proposed changes.

Building diversity, equity, and inclusion into our workplace, products, and programs is at the heart of creating a more helpful Google for everyone. When we get this right, we ensure that everyone feels like they belong at Google and beyond. We believe the greatest contribution we can make is sustained action within our company, our communities, and the world.

We continue to focus on developing, progressing, and retaining women and employees from underrepresented communities at all stages of their careers. For example, in 2019, Google hosted five Women of Color summits with a combined total attendance of nearly 1,500 women of color from over 20 countries. In 2020, we widened our lens to include all women of color across the company by hosting our first Women of Color summit for over 20,000 Googlers across more than 100 cities.

We are also proud to support the Employee Resource Groups (ERGs) that provide additional support and community for underrepresented employees and their allies. Collectively, more than 35,000 employees across more than 50 countries actively participate as members of our 16 ERGs. These Googler-initiated networks are passionate about promoting diversity, equity, and inclusion at Google.

Our work in hiring and retaining underrepresented communities at Google is having an impact for women in tech all over the world and for Black+ and Latinx+ people in the U.S. For example, since we began reporting, representation of women in tech roles at Google has grown from 16.6% in 2014 to 24.6% of our global tech workforce in 2020.

During the summer of 2020, in the wake of widespread racial unrest in the U.S., and in partnership with Black employees, we made [new commitments](#) to do our part to increase racial equity, within the company and in the wider world in which we operate and live. Among other commitments, we set a goal to improve leadership representation of underrepresented groups by 30% by 2025. We also announced a \$175 million+ economic opportunity package to support Black business owners, startup founders, job seekers, and developers, in addition to YouTube's \$100 million fund to amplify Black creators and artists.

Over the last year we have seen progress in a number of areas. Since 2018, we've continued to increase representation for women globally, and for Black+ and Latinx+ employees in the U.S. We saw the largest increase in our hiring of Black+ technical employees that we have ever measured.

For more information on our diversity efforts, see [Google's Diversity Annual Report](#).

When someone joins Google, we seek to provide resources to help them achieve their personal and professional success and well-being, and Google's efforts in these areas are widely known. In fact, in [Universum's 2020 ranking of the World's Most Attractive Employers](#), Google was ranked the number one employer for the 11th consecutive year, as well as number one for Engineering/IT.

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 an e-learning curriculum 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.

In terms of physical resources, we build our offices with the goal of providing our employees with a first-rate work environment, and we engage in a process of continuous re-evaluation with respect to design and functionality to meet the needs of our people.

Employee health is extremely important; we want our employees to live happy and healthy lives, both in and out of work. Our benefits programs are designed to give employees control over their health and well-being and to make it easy for them to take care of themselves and their families. Globally, new parents, regardless of gender, receive a minimum of 12 weeks of fully paid leave to bond with their child (birth parents receive an additional 10–12 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 full-time salary). Google also supports all employees (including parents) in availing themselves of flexible working options such as part-time working and job sharing. We also provide baby-bonding benefits, which is a sum of money given to Googlers who are new parents to help pay for services that support them during the first period of being a parent (e.g., house cleaning, healthy take-out food) to allow them to maximize the time and energy they can spend with their new family member.

## Social impact

We know that diversity and inclusion are values critical to our success and future innovation. We also know that challenging bias—inside and outside our organization—is the right thing to do. That's why we continue to support efforts that fuel our commitments to progress. These commitments require us to look at bias through a wider lens: at Google, in the industry, and in society. And while progress takes time, our actions today will determine who we are in the future.

Google has set company-wide goals to ensure that each of our products is highly accessible and to continue our emphasis on disability inclusion in our workforce. In 2019, we held our first ever Global Disability Alliance ERG summit. This gathering was an opportunity for employees from around the world to come together to collaborate and discuss strategies for disability inclusion at work and for improving accessibility in our products and workplace.

In 2019, we participated for the first time in the [Disability Equality Index](#), which serves as a comprehensive benchmarking tool for disability inclusion. We were proud to earn a perfect score on this index in 2019 and again in 2020, and we're committed to making every Googler feel welcome and included.

Around the world, Google engineers, designers, and marketers are working to understand the needs of communities that have been underrepresented in tech. Because we're building for billions of users who may not look or act or think like the teams building them, we need to make sure we're bringing different perspectives to the table at key points in the process. We are making sustained efforts to drive inclusion by design to enable inclusive products such as the Google Assistant. Launched in 2016 and now available in more than 90 countries and nearly 30 languages, Google Assistant helps more than 500 million people every month to get things done across smart speakers and Smart Displays, phones, TVs, cars, and more. Before launch, the product team worked with our product inclusion team and ERGs to avoid stereotypes, historical biases, offensive language, and hate speech.

We also work with external partners to provide digital skills training for everyone, aimed at helping people find jobs or grow their business and career. For example, our [Grow with Google](#) workshops are designed to help ensure that everyone is able to participate in the digital economy. Our training programs range from basic online skills, like how websites work and how to reach customers with email, to more advanced topics, like tracking results with analytics and international marketing.

As part of International Women's Day in 2020, Google supported the virtual networking event and information booth at the Women in Data Science (WiDS) Worldwide Conference. WiDS Worldwide hosted about 2,200 attendees representing 65 countries, 30% of whom visited our virtual Google booth. Throughout the rest of the year, 120 Women@Google global chapters from 52 countries engaged tens of thousands of employees virtually to discuss career development and programs to improve our culture.

In 2020, we partnered with women's student organizations—as well as organizations focused on people with disabilities, ethnic minorities, Black+ and LGBTQ+ communities, and other underrepresented demographics—across approximately 450 universities in North America and Europe to host over 350 events. Also in 2020, Google's Women Techmakers program supported our external Ambassadors in hosting around 200 community-led events for International Women's Day to inspire and empower over 80,000 women in tech globally. These events provide women with opportunities to develop their technical skills, celebrate their achievements through #IamRemarkable workshops, and continue to build networks in the tech industry. By the end of 2020, #IamRemarkable workshops had reached over 185,000 participants in more than 15,000 workshops across 150 countries. Almost half (49%) of workshop participants reported experiencing growth in their jobs, their careers, or both, which they attributed to #IamRemarkable.



As a part of our aforementioned commitments to racial equity, Google.org pledged \$12 million to support organizations working to advance racial justice. Among them were \$1 million grants each to The Leadership Conference Education Fund, the NAACP Legal Defense Fund, the NAACP Educational Fund's Policing Reform Campaign, and the Center for Policing Equity.

To support nonprofits in 2020, we committed a total of \$1 billion in Ad Grants. Since 2003, Ad Grants has provided nonprofits with up to \$10,000 per month in free Search ads to help them attract donors, recruit volunteers, and promote their missions. The increased funding went toward nonprofits tackling pressing issues like COVID-19 response and recovery—especially in hard-hit developing economies—and fighting racial injustice around the world.

In March 2021, Google.org launched the global \$25 million Impact Challenge for Women and Girls to support nonprofits and social organizations around the world that are working to advance the economic empowerment of women and girls and create pathways to prosperity. Impact Challenge grantees will receive funding, mentoring from Googlers, Ad Grants, and additional support to bring their ideas to life. Over the last five years, Google.org has provided \$55 million to nonprofit organizations supporting gender equity, and the Impact Challenge builds on this long-standing work.

## Respect of human rights

We are committed to respecting the human rights enumerated in the [Universal Declaration of Human Rights](#) and its implementing treaties, as well as to upholding the standards established in the [United Nations Guiding Principles on Business and Human Rights](#) (UNGPs) and the [Global Network Initiative \(GNI\) Principles](#).

Google conducts our work on civil rights and human rights through our Human Rights Program, a central function consisting of experts in the field supporting our efforts to ensure that we are meeting our commitment to the UNGPs, GNI Principles, and other civil and human rights instruments. The Human Rights Program develops and advances company-wide strategy on civil and human rights, advises product teams on potential civil and human rights impacts, conducts human rights due diligence, and engages external experts and stakeholders.

Dedicated personnel are focused on product, regional, and functional areas, and they are responsible for the day-to-day operations of protecting our users and ensuring compliance with legal requirements. Senior management develops the strategy around and oversees the implementation of civil and human rights commitments and GNI Principles at Google and provides regular updates on relevant issues to the members of our Audit and Compliance

Committee in accordance with its Charter, which was amended in 2020 to explicitly include risk oversight of civil and human rights issues. The Audit and Compliance Committee also provides pertinent reports to the full Board of Directors to ensure that it is apprised of these matters.

As we grow as a company, we continue to enhance and evolve our implementation of our human rights commitments. For example, we have established a Human Rights Executive Council to provide oversight and guidance to our Human Rights Program on global human rights and domestic civil rights in the U.S. Council members represent key product areas and functions across Google and regularly hear from the leaders of the Human Rights Program. More information on our human rights commitments can be found at [Google: Human Rights](#).

We are 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 promote the freedom of expression and privacy rights of their users. As part of GNI, we work to protect, promote, and support human rights, including through improved responsible decision-making, shared learning, and multi-stakeholder collaboration. Senior management oversees the implementation of the human rights and GNI Principles at Google and provides quarterly updates on relevant issues to the members of our Board of Directors. As a GNI member, Google is subject to a periodic assessment by an independent party to review how the company integrates GNI Principles into our governance, due diligence and risk management, and operational practices. GNI makes these company assessments publicly available.

At our foundation, Google's Code of Conduct sets forth our expectations for employees regarding privacy, security, freedom of expression, discrimination, harassment, corruption, and compliance with all laws, including anti-modern slavery legislation. The Code encourages employees to raise questions or concerns about the Code and to report suspected violations. Employees failing to follow the Code can be subject to disciplinary action, including termination of employment. Failure of a Google contractor, consultant, or other covered service provider to follow the Code in connection with their services to Google can result in termination of their relationship with Google. Our Code of Conduct training reinforces the expectation that employees, temporary workers, and contractors (collectively, "our workers") follow applicable laws and report concerns of illegal or unethical activity.

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. When we learn about a potential violation of our policies or Code of Conduct, we look into the concern consistent with our robust process for carefully investigating such allegations and then 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.

Our commitment extends beyond our own practices to those of our suppliers. We have a [Supplier Code of Conduct](#) (the “Supplier Code”), which is based on the [Responsible Business Alliance \(formerly the Electronic Industry Citizenship Coalition\) Code of Conduct](#); international standards, such as the UN Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights; and our own values. The Supplier Code sets standards designed to protect the health, safety, and treatment of workers; minimize their environmental impact; combat corruption; respect freedom of association and collective bargaining; comply with minimum wage laws; and prohibit any form of forced, bonded (including debt bondage), or indentured labor, involuntary prison labor, sex trafficking, and slavery or trafficking of people.

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. 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 strive to protect our users’ privacy, free expression, and secure access to the web when they use Google products. We outline how we safeguard privacy and security on our [safety site](#), give users control over their information through [Google Account](#), and detail our efforts toward protecting online expression and access to information in our [statements on freedom of expression](#). We’re also committed to complying with Europe’s General Data Protection Regulation.

In 2018, we updated and improved our [Privacy Policy](#), making it easier to understand, adding informative videos that explain our practices, and embedding key privacy controls directly in the text. We also updated the privacy and security settings in Google Account, which ensures 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. In 2019, we introduced [auto-delete controls](#), which give you the choice to have Google automatically and continuously delete your Location History, 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, more proactive privacy controls, and others. We continue to develop and improve these and other tools to make them more robust and intuitive.

In June 2018, we announced the [Google AI Principles](#): seven principles to guide the ethical development of our Artificial Intelligence work. In addition to these seven principles, we have identified AI applications we will not pursue, including designing or deploying AI in technologies whose purpose contravenes widely accepted principles of international law and human rights. These are concrete standards that govern our research and product development and impact our business decisions. We [established](#) a formal [review structure](#) to assess new projects, products, and deals for alignment with the principles. This diverse and inclusive group of Googlers includes senior executives, user researchers, social scientists, ethicists, human rights specialists, policy and privacy advisors, legal experts, and senior experts from a variety of other disciplines.

We believe restrictions on the freedom of expression should be consistent with international human rights laws or standards and the rule of law and be necessary and proportionate for the relevant purpose. We also believe that laws around 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.

We also continue to innovate around product-specific transparency with YouTube's industry-leading transparency reporting on how it enforces the [Community Guidelines](#). We are committed to tackling the challenge of quickly removing content that violates our Community Guidelines and reporting on our progress. That is why, in April 2018, we launched a quarterly [YouTube Community Guidelines enforcement report](#).

Recent examples of Google's work on human rights issues include developments in content quality policies and facial recognition applications. On content quality, one of the most complex and constantly evolving areas we deal with is hate speech. In 2019, YouTube took a close look at its approach towards hateful content in consultation with dozens of experts in subjects like violent extremism, supremacism, civil rights, and free speech. Based on those learnings, YouTube made several updates to its hate speech policy including removing more hateful and supremacist content, reducing borderline content and raising up authoritative voices, and continuing to reward trusted creators and enforce monetization policies. Similarly, our ongoing work on information integrity led to the release of a [white paper](#) in 2019 detailing our work to tackle the intentional spread of disinformation across Google Search, Google News, YouTube, and its advertising systems.

In 2019, in collaboration with independent experts using the UN's Guiding Principles on Business and Human Rights as a framework, Google commissioned a formal human rights impact assessment (HRIA) of the Celebrity Recognition tool and technology's potential impact on human rights. The HRIA played an essential role in shaping the application program interface's capabilities and the policies established around them, and we publicly released a [summary of the HRIA](#).

Our Chief Compliance Officer oversees a team focused on combating modern slavery in the company's supply chains and business operations. The Chief Compliance Officer provides quarterly updates on the status of our Anti-Modern Slavery Program to our Compliance Steering Committee, composed of senior executives from across our business. In addition, our Chief Compliance Officer provides regular updates on our anti-modern slavery efforts to the Audit and Compliance Committee of Alphabet's Board of Directors. Regular updates on the status of the Responsible Supply Chain Program—which includes addressing human rights risk, among many other areas—are provided to our Supplier Responsibility Steering Team, composed of our Chief Compliance Officer and leaders from Google's direct and indirect supply chains.

Our [Policy Against Modern Slavery](#) prohibits knowingly engaging in or supporting human trafficking and child labor practices in our business operations. Any violation of our standards by a Google employee can result in disciplinary action, including termination of employment. Any violation by a supplier can result in contract termination. Recently, we published our fifth annual [Statement Against Modern Slavery](#), which provides more detail on our efforts to ensure that modern slavery is not taking place in our supply chains and business operations.

We perform periodic independent third-party audits at hardware and non-hardware suppliers' facilities. The audits include in-depth tours, meetings with management, worker interviews, document reviews, and assessments of related areas, such as dormitories, cafeterias, wastewater treatment facilities, and warehouses. The audit protocol is designed to assess suppliers' performance in the areas covered by our Supplier Code, including human rights risk. We work with our suppliers to determine root causes and develop corrective action plans for any issues identified during the audit. While our audits are announced, our supplier managers are trained to report any concerns they might observe on an ongoing basis. In 2020, we published our fourth annual [Supplier Responsibility Report](#). This report provides more detailed information about our above-mentioned audit and supplier engagement efforts.

As part of our efforts to identify and mitigate human rights risks in our supply chain, we also conduct due diligence on our direct suppliers and vendors, which include both product and service suppliers, identified as

having higher risk through our risk assessments. As part of the due diligence process, suppliers complete a self-assessment questionnaire about their working conditions and management systems. The due diligence process also includes background checks, examination of labor-related red flags that appear in publicly available databases and media sources, and a review of higher-risk suppliers' names against human trafficking watch lists.

If we discover red flags, we remediate these issues and document them. In certain cases, we may decide to no longer pursue a relationship or to terminate our current relationship with a supplier. Our workers who manage relationships with higher-risk suppliers identified in our risk assessment receive supplemental in-person training. In addition, we have an online training course that covers all of the aspects of our Supplier Code for our workers in roles related to hardware supplier management. This training helps our workers identify human rights red flags, shares best practices, and instructs our workers to report human rights concerns.

Certain areas of our business, such as our hardware production, present human rights risks we've been working to eradicate; however, we appreciate that there are risks present in many aspects of our business that we must continue to work to understand and address. Working to mitigate human rights risk is an ongoing process, and we continually strive to assess this risk in all facets of our business.

Finally, we seek to apply technological innovation to advance social good in the diverse communities and contexts in which we operate. Thus, we support technology-focused social impact projects and provide resources to help nonprofits tackle challenges such as human trafficking, education, and economic development through Google's [AI for Social Good](#) program and [AI Impact Challenge](#).

## 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 legal team dedicated to preventing corruption in the company's business operations and supply chain. The Chief Compliance Officer provides quarterly updates on the status of our anti-corruption compliance program to the Compliance Steering Committee, as well as the Audit 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.

We continually strive to assess corruption risk in all facets of our business. As with other companies in our industry, bribery and corruption risks posed by working with third parties and intermediaries remain a significant corruption risk to Google.

We undertake a number of efforts to mitigate the risk of bribery and corruption 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 is administered to all employees, contains an anti-bribery module. We also periodically supplement our online trainings with live instruction. In 2020, Google had a Code of Conduct training compliance rate of 98.55%.
- 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.

## Conclusion

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. We believe in technology's power and potential to have a profoundly positive impact across the world. There is much work that remains to be done, and we will continually strive to achieve this objective.