



# 2022

# Norwegian Transparency Act Statement

## Introduction

Google LLC (Google) and its subsidiaries—including Google Norway AS—are committed to treating all workers with respect and dignity, ensuring safe working conditions, and operating ethically. We stand against all forms of human rights abuses and actively work to prevent them from taking place in our supply chains and business operations.

We are issuing this statement pursuant to the Norwegian Transparency Act, which requires Google Norway AS to publish an annual statement disclosing its efforts to conduct human rights due diligence in its supply chains and business operations. Google's human rights due diligence efforts are managed as a global program by Google LLC, covering each of Google's subsidiaries. As such, this statement is prepared based on activities at the Google LLC level, including specific efforts for Google Norway AS, and covers our 2022 financial year (January 1 - December 31, 2022).

For the purposes of this statement, "Google," "the company," "we," "us," "our," and similar terms include Google, its subsidiaries, and its controlled entities, unless the context indicates otherwise. "Modern slavery," refers to slavery, servitude, forced or compulsory labor, child labor, and human trafficking. In addition, "supplier managers" refer to employees managing our suppliers, and "our extended workforce," refers to our supplier employees, temporary workers, and contractors.

## 1. Structure, business, and supply chain

Google is a wholly owned subsidiary of Alphabet Inc. (Alphabet). Google's business includes products and services such as ads, Android, Chrome, Google Cloud, Google Maps, Google Play, Search, and YouTube, as well as hardware products, such as Fitbit wearable devices, Google Nest home products, Pixel phones, and other devices. Google generates revenues by delivering relevant, cost-effective online advertising; cloud-based solutions that provide customers with infrastructure, platform services, as well as communication and collaboration tools; sales of other products and services, such as apps and in-app purchases, and hardware; and fees received for subscription-based products such as YouTube Premium and YouTube TV. We are continually innovating and building new products and features that will help our users, partners, customers, and communities.

Our business is supported by a significant amount of technical infrastructure, including data centers located in the U.S. and other countries. We also rely on suppliers to manufacture many of our finished products, to design certain of our components and parts, and to participate in the distribution of our products and services. Our human rights efforts require strong collaboration and engagement with our global suppliers. As such, our philosophy is to work in partnership with all of our suppliers, empowering them to establish programs, policies, and practices that mitigate the risk of human rights abuses from occurring in their supply chains.

Google Norway AS is a subsidiary of Google and maintains an office in Oslo, Norway. Google Norway AS provides marketing and sales support services to Google entities in the region and research and development services to Google. In 2022, Google Norway AS worked with 40 suppliers from across nine countries.

## 2. Policies and Procedures

We strive to hold our employees and suppliers to high standards. We are committed to respecting human rights as defined by the [International Bill of Human Rights](#), consisting of the Universal Declaration of Human Rights and the two main instruments through which it has been codified—the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights. Where relevant, we are also guided by other international human rights instruments, including the International Convention on the Elimination of All Forms of Racial Discrimination, the Convention on the Elimination of All Forms of Discrimination Against Women, the Convention on the Rights of the Child, the Convention on the Rights of Persons with Disabilities, the Declaration on Fundamental Principles and Rights at Work, and the International Convention on the Elimination of All Forms of Racial Discrimination.

We have embedded our commitment to international human rights standards and principles in numerous policies and procedures.

- Our [Human Rights Statement](#) provides detail on executive oversight and governance of our Human Rights Program, which includes due diligence, risk management, and engagement with external experts and affected stakeholders.
- Our [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.
- Our [Supplier Code of Conduct](#) sets expectations designed to establish a baseline of norms and practices for our suppliers that protect: labor and human rights, health and safety, environmental concerns, ethics and compliance, and the adoption of management systems. The Supplier Code of Conduct is based on the [Responsible Business Alliance \(formerly the Electronic Industry Citizenship Coalition\) Code of Conduct](#); international standards, such as the UN Guiding Principles on Business and Human Rights, ILO International Labour Standards, and the Universal Declaration of Human Rights; and our own values.

- Contracts with suppliers include language requiring compliance with our Supplier Code of Conduct. We also include extensive anti-modern slavery contractual language in some supplier contracts.
- Our [Policy Against Modern Slavery](#) defines modern slavery, gives a concrete list of prohibited actions, and provides reporting channels for suspected instances of modern slavery.
- We operate a helpline that gives our employees and members of our extended workforce an option to report concerns anonymously, including modern slavery and human rights concerns.
- Alphabet's [Conflict Minerals Policy](#) directs suppliers to perform due diligence on the source and chain of custody of minerals used to manufacture products for Google. We expect our suppliers to source only from conflict-free smelters, such as those that are compliant with Conflict-Free Smelter Program assessment protocols, and work with suppliers to achieve conflict-free sourcing.
- Our [AI Principles](#) state our commitment to socially beneficial and accountable AI technology, and reaffirm our companywide commitment to human rights by explicitly stating that we won't design or deploy AI technology that violates widely accepted principles of international law and human rights.

### 3. Governance

Google's work on human rights is conducted through our Human Rights Program, a central function responsible for ensuring -- across Google and all its products (such as hardware, Search, Cloud, and YouTube) -- that we are meeting the above commitments. Among its duties, the Human Rights Program advances company-wide strategy on civil and human rights, advises product teams on potential civil and human rights impacts, conducts and oversees ongoing human rights due diligence, and engages external experts and stakeholders. The Program works in close collaboration with the Supplier Responsibility and Anti-Modern-Slavery teams, which are responsible for overseeing Google's Supplier Code of Conduct, managing modern slavery risks, and ensuring compliance with anti-modern slavery and human rights due diligence laws, respectively.

Our Chief Compliance Officer, who leads the Office of Compliance and Integrity, maintains oversight of the Anti-Modern-Slavery and Supplier Responsibility programs. Our Chief Compliance Officer also provides relevant updates to the Audit and Compliance Committee of Alphabet's Board of Directors, which, in accordance with its Charter, has oversight of risks associated with, among other matters, human rights.

In 2021, we established a Human Rights Executive Council ("Council"), composed of senior leaders across relevant product areas and functions, which is led by our Chief Legal Officer. The Council provides oversight and guidance across our human rights program, and ensures issues are being addressed consistently. The Council also has a standing sub committee on Assessments and Disclosures that oversees key assessments and reports back to the broader Council as relevant.

We have dedicated global leads managing our Anti-Modern-Slavery and Supplier Responsibility programs, focusing on combating modern slavery and human rights violations in the company's supply chains and business operations. The Human Rights Program is the central governance team for managing human rights risks within Google's operations and through its products and services.

In 2022, our global Anti-Modern-Slavery lead and global Supplier Responsibility lead provided regular updates on the status of the Supplier Responsibility Program—which includes addressing human rights risk—to the Supplier Responsibility Steering Team, which comprises our Chief Compliance Officer and leaders from our data center, hardware, and extended workforce business areas.

## 4. Human Rights Due Diligence

The types of human rights issues and our responsibilities related to them vary across our products and services, as well as the markets in which we operate. Accordingly, an advanced system of ongoing human rights due diligence is essential to effectively meet these commitments and responsibilities. This continuous process is carried out by several teams at Google.

### a) Our Operations, Products, and Services

[Google's Code of Conduct](#) sets forth our foundational 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 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, supplier, 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 and members of our external workforce (temporary workers, vendors, and independent 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 employees and members of our extended workforce are trained on our Code of Conduct. The training covers topics such as how to conduct due diligence to identify and avoid working with third parties that engage in modern slavery or other illegal practices.

Consistent with the United Nations Guiding Principles on Business and Human Rights (“UNGPs”), Google conducted a companywide Human Rights Saliency Review to prioritize risks according to the severity of their potential impact on people and their likelihood of occurrence. The Saliency Review serves as a foundation for the agenda and priorities of Google’s Human Rights Program.

The Human Rights Program also leads training initiatives within the company to educate Googlers on what human rights are, how to identify potential salient rights impacts, and the correct channels to report concerns for further review. Training initiatives include internal human rights symposia, Human Rights Program fellowships and tailored training sessions with different teams.

Our employees and members of our extended workforce are trained on our Code of Conduct. The training covers topics such as how to conduct due diligence to identify and avoid working with third parties that engage in modern slavery or other illegal practices. Employees in roles related to hardware supplier management complete an online training course on our Supplier Code of Conduct and Supplier Responsibility Program. Our extended workforce managers also complete an online training course on our Supplier Code of Conduct. Both online trainings include guidance on modern slavery red flags, anti-modern-slavery best practices, and how to report modern slavery concerns.

In 2022, we developed and launched an online modern slavery training course for our supplier managers in business units identified as high risk based on our 2021 modern slavery risk assessment. The training covered modern slavery indicators prevalent in industries pertinent to our supplier base, worker populations most vulnerable to modern slavery, and sample risk scenarios involving modern slavery indicators. The training also explained how supplier managers can better understand the risk profile of the suppliers they manage and how to report concerns.

In 2022, we conducted a product-level risk assessment to identify Google products that could be associated with modern slavery. As part of the risk assessment, we conducted desktop research on the types of products that could be used to facilitate modern slavery and mapped Google products against stages of the human trafficking lifecycle. We developed a methodology that prioritized products based on several factors, including product content and the likelihood of occurrence. In December 2022, we identified a short list of products which require further analysis. We plan to work with product teams to develop risk mitigation and management solutions for the products identified.

## b) Our Supply Chain

### i) Google Norway AS

In 2022, Google Norway AS worked with 40 suppliers based in nine countries, mostly in Europe. Google Norway AS' suppliers support facilities management and the company's marketing and sales functions. Google Norway AS relies on suppliers for administrative support, legal and consulting services, and janitorial, catering, and security services, among others.

We conducted a high-level risk assessment on Google Norway's supply chain to identify suppliers who may be most susceptible to potential or actual risks related to human rights and decent working conditions. The assessment considered factors such as geography, business models structured around high risk work practices, and sector and industry risks. The assessment identified 21 suppliers who may be associated with human rights risks, including those related to working hours, wages, freely chosen employment, and health and safety. We are working with relevant teams to ensure proper risk mitigation approaches are implemented with respect to these suppliers.

### ii) Google

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, ILO International Labour Standards, and the Universal Declaration of Human Rights; and our own values. The Supplier Code sets expectations designed to establish a baseline of norms and practices that protect: labor and human rights, health and safety, environmental concerns, ethics and compliance, and the adoption of management systems. Annually, Google evaluates and audits a portion of our suppliers against these standards to ensure conformance and compliance with them.

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. Google's due diligence evaluates new and existing risks against industry standards and compliance obligations. Google communicates identified risks to our suppliers and internal executive teams at least annually.

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

We conduct due diligence on suppliers identified as having higher risk based on the assessments described above (collectively, “higher-risk suppliers”). Our due diligence process is conducted at supplier onboarding and on a continuous basis; it involves assessing suppliers for social, environmental and ethical risks, including modern slavery risks. As part of the due diligence process, higher-risk suppliers complete a self-assessment questionnaire about their working conditions and management systems. The due diligence process also includes supplier background checks, examination of labor-related red flags that appear in publicly available databases and media sources, and a review of higher-risk suppliers’ names against human trafficking watch lists and sanctions lists. If we discover red flags, we conduct extensive and documented follow-ups to address these issues. In certain cases, we may decide to no longer pursue a relationship or to terminate our current relationship with a supplier.

We 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 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 that outlines the root cause of the finding, how and when the company will resolve the issue, and what steps will be taken to prevent recurrence.

We also assess the effectiveness of our actions through ongoing monitoring of suppliers whose audit findings reveal potential modern slavery risks, regularly reviewing and updating our supply chain implementation guidance, and developing tools to better identify populations at risk of modern slavery within our supply chain.

In 2022, we assigned select suppliers, including those subject to audits, to complete interactive e-learning modules on topics, including Labor, Health and Safety, and Preventing Forced Labor. Over 100 suppliers completed these trainings.

As described above, we offer multiple reporting options to our employees and members of our extended workforce, including a helpline that gives an option to report concerns anonymously, including on modern slavery. We promote this reporting channel through our internal policies, communications, and trainings. We also have a policy prohibiting retaliation for raising concerns.

Our 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, can be found on our [Supplier Responsibility](#) page.

## 5. Partnerships

We are a founding member of [GNI](#), a multi-stakeholder nongovernmental organization working to advance free expression and privacy. The GNI Principles are informed by the UNGPs, 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.

To support industry innovation and collaboration, we engage with [BSR](#)’s Human Rights Working Group ([HRWG](#)), the Responsible Business Alliance ([RBA](#)), and the Global Business Coalition Against Human Trafficking ([GBCAT](#)). In 2022, we joined [Tech against Trafficking](#) and supported its [Accelerator Program](#), which aims to advance and scale the work of organizations that offer promising technology solutions to combat human trafficking. Through our membership in GBCAT, we also supported the development of GBCAT’s [guidance](#) on deceptive recruitment practices. The resource aims to explain to suppliers how certain recruitment practices can lead to exploitation and modern slavery.

## Conclusion

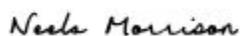
Our wide array of products and services means we touch human rights in a wide variety of ways. As part of our founding mission, we've looked for ways to organize the world's information and make it universally accessible and useful. We continue to explore ways to harness the power of technology to advance human rights.

The programs, processes, and efforts mentioned above serve as a foundation for further in-depth human rights due diligence, in line with our [commitments](#) to human rights. We hope that, through the efforts of our Human Rights Program, we will continue to make good on our commitments and help realize the many benefits of technological advancements.

This statement was approved by the Google Norway AS Board of Directors in June 2023.



Michael J. Tangney  
Chairman of the Board  
Google Norway AS  
Date: 28 June 2023



Neela M. Morrison  
Board Member  
Google Norway AS  
Date: 28 June 2023