Google

European Union NFRD Report

2024

Contents

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 2024, 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 2023 fiscal year (January 1 to December 31, 2023). When 2023 data is not yet available, data covers our 2022 fiscal year (January 1 to December 31, 2022). Additional information about environmental, social, and governance topics can be found on Alphabet's Investor Relations page.

For the purposes of this report, "we," "us," "our," 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 AI and, since 2016, an AI-first company.

Google Services' core products and platforms include ads, Android, Chrome, devices, Gmail, Google Drive, 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 increasingly 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 from the 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, collaboration tools, 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're continually innovating and building new products and features that will help our users, partners, customers, and communities.

For more information on Google's business model, see Alphabet's 2023 Annual Report.

Environmental initiatives

For the past 25 years, Google has been working hard to help build a more sustainable future. For both our operations and our product strategy, we've set ambitious near-term goals and aspirations, and use them to challenge us and ensure we continue to innovate.

Governance
Alphabet's Board of Directors has delegated to its Audit and Compliance Committee the primary responsibility for the oversight of many of the risks facing our businesses. The Audit and Compliance Committee reviews and discusses with management any major risk exposures, including environmental sustainability risks, and the steps that Alphabet takes to detect, monitor, and actively manage such exposures.

Our Sustainability Focus Area, an internal management team led by our SVP of 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 the company's environmental impacts from its operations and value chain, and by improving climate resilience.

Google continues to build on qualitative and quantitative risk assessments to identify climate-related risks and opportunities and understand their associated impact. We've increased our efforts to align our climate risk assessment process more closely with the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), leveraging the TCFD categories of risks and opportunities and conducting climate scenario analyses.

Beginning in 2022, we endeavored to assess 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, Google annually undertakes a water risk assessment of our data centers and offices to identify potential water-related risks that may present opportunities for water stewardship action and risk mitigation.

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 to mitigate and adapt to climate change—focusing on sectors like energy and transportation.
- **Our operations:** We're working to drive environmental sustainability across our operations in four key ways: accelerating the transition to a net-zero carbon future, advancing water stewardship, building a circular economy, and restoring nature and biodiversity.

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 more transportation options in Search, such as train routes.

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 individuals and organizations achieve their goals and maximize impact.

Net-zero carbon

We're working to accelerate the transition to a net-zero future, and we've taken significant steps over the past two decades to minimize our greenhouse gas (GHG) emissions.

In 2021, we set an ambitious goal to reach net-zero emissions across all of our operations and value chain by 2030. To meet this goal, we aim to reduce 50% of our combined Scope 1, Scope 2 (market-based), and Scope 3 absolute emissions (compared to our 2019 base year) by 2030, and we plan to invest in nature-based and technology-based carbon removal solutions to neutralize our remaining emissions.

We continue working to optimize energy consumption at our data centers. In 2023, the average annual power usage effectiveness (PUE)[1] for our global fleet of data centers was 1.10, compared with the industry average of 1.58[2]— meaning that Google data centers used about 5.8 times less overhead energy for every unit of IT equipment energy. Since 2012, our average annual fleet-wide PUE has stayed at or below 1.12.

[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 2023 Global Data Center Survey, the global average PUE of respondents' data centers was around 1.58. The Institute noted that the primary contributor to the flatlining of the industry average PUE is a richer geographical mix of surveyed data centers, with an increasing number of data centers in the Asia, Middle East, Africa, and Latin America regions. Facilities in these regions tend to be smaller in capacity and located in warmer climates—both factors which typically require greater energy consumption.

Our primary approach to reducing our Scope 2 emissions is through the procurement of carbon-free energy (CFE).[3] In 2020, we set a goal to run on 24/7 CFE—every hour of every day on every grid where we operate—by 2030.

2023 marks the first year of implementation of our carbon removals strategy, and while we have a long way to go to meet our 2030 target, we've begun establishing impactful partnerships and have started contracting for carbon removal credits. As of the end of 2023, we signed three carbon credit offtake deals representing a total purchase of approximately 62,500 tCO_2e of removal credits, which are contracted for delivery by 2030.

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. Our water stewardship strategy is centered on enhancing responsible water resource management across our data centers and offices, sharing tools and technology that can help address water challenges, and improving watershed health and ecosystems in water-stressed communities. In 2021, we announced our goal to replenish 120% of the freshwater[4] volume we consume, on average, across our offices and data centers by 2030, and help restore and improve the quality of water and health of ecosystems in the communities where we operate.

Circular economy

We aim to maximize the reuse of finite resources across our operations, products, and supply chains. Our circularity principles focus on designing out waste and pollution from the start, keeping products and materials in use, and promoting healthy materials and safer chemistry. To this end, we're pursuing innovative strategies—from adaptive reuse building projects to recycled materials in our consumer hardware devices.

Nature and biodiversity

We strive to restore and enhance nature and biodiversity through a four-pillar 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.

Conclusion

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

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[3] Carbon-free energy is any type of electricity generation that doesn't directly emit carbon dioxide, including (but not limited to) solar, wind, geothermal, hydropower, and nuclear. Sustainable biomass and carbon capture and storage (CCS) are special cases considered on a case-by-case basis, but are often also considered carbon-free energy sources.
[4] 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.

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 be happy, healthy, and productive. 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 diverse 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 mothers rooms in every office for nursing parents, equipped with breast pumps and refrigerators. 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. Parents and caregivers are also able to use 20 days of backup care (refreshed each year) when their regular care isn't available.

Our competitive compensation programs help us to attract and retain top candidates, and we'll continue to invest in recruiting talented people to technical and non-technical roles, and rewarding them well. We provide a variety of high-quality training and support to managers to build and strengthen their capabilities—ranging from courses for new managers, to learning resources that help them provide feedback and manage performance, to coaching and individual support. Additionally, 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 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.

To build technology that benefits everyone, Googlers need to feel comfortable innovating, creating, and doing their best work. We're continuing our efforts to build a workforce that reflects our users, including through hiring and retaining from underrepresented communities. For example, since we began reporting, representation of women in tech roles at Google has grown from 16.7% in 2014 to 25.9% of our global tech workforce in 2023. In 2023, we remained committed to prioritizing a sense of belonging across every team at Google, and expanded one of our most impactful employee retention initiatives, Stay and Thrive, to select markets in Europe, the Middle East, and Africa, with plans to expand to more regions in 2024. Launched in the U.S. in 2019, Stay and Thrive is a formal, structured coaching and advocacy program focused on retaining Googlers from a range of backgrounds. The program provides direct 1:1 coaching and support to help them thrive at Google. In EMEA, we held Turning Point 2023, a flagship summit for Black+ Googlers and interns. Logging 200-plus registrations, the event fostered empowerment, connection, and dialogue, and nearly 80% of respondents expressed increased pride in working at Google, a strong endorsement of the program's impact.

For more information on our diversity efforts, see Google's Diversity Annual Report.

Culture and development

We remain steadfast in our efforts to embed fairness and belonging deeply into our company and our communities. We're focusing on continuing this work responsibly to create systems and lasting change for Google and the communities we serve. When we get this right, we ensure that everyone feels like they belong at Google and beyond.

We're proud to support the Employee Resource Groups (ERGs) that provide meaningful communities for employees. Collectively, more than 35,000 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, invest in professional development, and build community. They organize year-round mentorship programs, talks, and workshops that help advance women into leadership. These Googler-initiated networks are passionate about helping all employees feel like they belong at Google.

When managers and leaders feel equipped with the necessary skills to hire and retain talent, our entire organization is strengthened. In 2022 Google's Inclusive Learning & Development Team launched the Multiplier Moments workshop in the US. The output of our collaboration was rich: a Google-specific framework designed to enable managers and leaders to recognize,

assess, and respond to key moments that can promote a positive and welcoming culture. The program, which is expanding to the APAC and EMEA regions, will reach approximately 10,000 managers and leaders in 2024.

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 curriculums 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 annually. The results are used to identify ways to improve the employee experience, drive leader-led actions, and inform business priorities.

Working conditions

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's free of harassment, intimidation, bias, 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, and we offer unconscious bias training.

In an effort to accelerate our commitments to be a representative, equitable, and respectful workplace, we provide transparency around 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 as well as 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 as well as 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.

In 2020, we announced 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 guiding 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 reviews the effectiveness of our sexual harassment and retaliation prevention programs and proposed changes.

The core workplace enhancements all went into effect in the first quarter of 2022, but our work continues. Under the guidance of the DEI Advisory Council, we conduct reviews annually to make sure our workplace commitments are operating effectively and as intended. As our underlying processes change—like our performance management and promotions processes—we've ensured ongoing adherence to our workplace commitments, making adjustments as appropriate and necessary. Additionally, we continue to assess whether there are any other enhancements we should make as part of maintaining a healthy and effective program.

Our guiding principles remain foundational to our work, and we remain committed to always making progress in this area.

Social impact

In 2023, we celebrated our 25th anniversary. Over this extraordinary quarter century, we've learned that a range of perspectives and experiences spurs creativity and innovation. 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. We do a better job for our users when we keep that mission front and center.

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. For example, since 2019, we've consistently demonstrated a strong commitment to disability inclusion, as evidenced by perfect scores each year in the Disability Equality Index, a comprehensive benchmarking tool for such practices. This achievement underscores our ongoing dedication to fostering a welcoming and inclusive environment for all Googlers. Women have also historically been underrepresented in tech careers, including here at Google. With that in mind, we expanded Mind the Gap, our global outreach program that encourages girls and women

to pursue tech careers. The program now reaches 23 countries, helping to demystify the work and life of a software engineer for young women interested in STEM careers.

To help ensure that everyone is able to participate in the digital economy, we work with external partners to provide digital skills training for everyone. For example, our Grow with Google workshops are aimed at helping people find jobs and grow their business and career. We also offer training programs on topics ranging from basic online and AI skills, like how to get your business online and 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, IT support, project management, digital marketing, and UX design within three to six months, with no degree or experience required. Based on U.S. survey responses, 75% of program graduates report an improvement in their career within six months of certificate completion.

We rely on thousands of suppliers to help us run our business—from marketing agencies and construction, to food and professional services. We've learned that more diversity in our supply base helps us create better products and services for Googlers and our users. In 2022, we set a public commitment of spending $2.5 billion with diverse-owned suppliers, while expanding our program beyond the U.S. to include suppliers from historically underrepresented groups around the world. We exceeded that goal in 2022 by spending $2.8 billion with diverse-owned suppliers.

Our dedication to inclusion also extends to our approach to AI development. We believe AI can positively impact the world if developed responsibly. Our research and products, focused on addressing AI's risks while maximizing its benefits, 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 autocomplete suggestions in Google Search; translation across 133 languages in Google Translate; and organization, searching, and editing in Google Photos.

We believe AI can solve some of the hardest societal, scientific and engineering challenges of our time. For example, in 2020, Google DeepMind's AlphaFold system solved a 50-year-old protein folding challenge. Since then, we've open-sourced to the scientific community

200 million of AlphaFold's protein structures, which are used to work on everything from accelerating new malaria vaccines to advancing cancer drug discovery and developing plastic-eating enzymes. As another example, AI can also have a transformative effect on climate progress by providing helpful information, predicting climate-related events, and optimizing climate action. Using advanced AI and geospatial analysis, Google Research has developed flood forecasting models that can provide early warning and real-time flooding information to communities and individuals.

Google.org—Google's philanthropy—supports nonprofits, civic entities, and other organizations that address humanitarian issues worldwide. We empower these organizations with a unique blend of funding, in-kind donations, and technical expertise from Google employees—supporting scalable, data-driven solutions to global challenges with the potential to produce meaningful change.

We do this by leveraging technology and data, especially AI and machine learning, to support the creation of free, open-sourced tools and datasets for the global community. In 2023, we granted more than $67 million to social impact organizations for projects that leverage AI to build a more sustainable world, including through two open-call funding programs launched in 2022— the Google.org Impact Challenge on Climate Innovation and AI for the Global Goals. The Google.org Impact Challenge on Climate Innovation provided $30 million to support breakthrough projects that use information, innovation, and AI to accelerate climate action.

Furthermore, in 2023, Google.org launched the €10 million Social Innovation Fund on AI in Europe. The fund provides mentoring and support to entrepreneurs from underserved backgrounds to help them develop transformative AI solutions and apply them to the issues they're tackling on a daily basis. From advancing climate solutions, providing upskilling and access to employment, to fighting disinformation, these entrepreneurs will have the goal of making the benefits of AI available to everyone. To help more social impact organizations take advantage of AI-powered tools, in 2023, the Google for Nonprofits program donated more than $2 billion in Google Ad Grants and Google Workspace to nonprofits. This gave more than 300,000 nonprofits around the world the opportunity to use AI-powered features in Ads and Workspace at no cost. Finally, we continue to support organizations in the fight for racial justice and since 2015, Google.org has directed more than $40 million in cash grants and 50,000 pro bono hours through the Google.org Fellowship.

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. Provides relevant updates to the members of the Audit and Compliance Committee of Alphabet's Board of Directors 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.

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 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.

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 are made to implement the GNI Principles. In 2022, we underwent our fourth assessment, and the GNI determined that we're making good-faith efforts to implement the GNI Principles with improvement over time.

More information on our human rights commitments can be found at Google Human Rights.

Human rights and emerging technology

Frameworks such as Google's AI Principles, which we announced in June 2018, help to guide the assessment of emerging risks and the ethical development of our AI work. In addition to seven objectives for AI applications, we've identified four AI applications we won't pursue, including designing or deploying AI in technologies whose purpose contravenes widely accepted principles of international law and human rights. The principles serve as an ethical charter to guide our research, product development, and business decisions. We established a formal review structure to assess new projects, products, and deals for alignment with the principles. This diverse and inclusive structure 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. In December 2023, we published our 5th annual AI Principles Progress Update – our review of our commitment to responsibly develop AI. The report provides a comprehensive look at how we put the AI Principles into practice as we develop emerging technologies. We continue to publish updates, which can be found at g.co/AI/ProgressUpdates.

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. Separately, the Code 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's 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. 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.

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, as well as relevant laws and regulations.

The foundation for our supplier responsibility efforts is our Supplier Code of Conduct, which sets forth supplier expectations designed to protect the health, safety, and treatment of workers, including the prohibition of any form of modern slavery. The Supplier Code of Conduct is based on the Responsible Business Alliance Code of Conduct; international standards, such as the UNGPs, ILO International Labour Standards, and the Universal Declaration of Human Rights; and our own values. Our Policy Against Modern Slavery defines modern slavery, gives a concrete list of prohibited actions, and provides guidance on how to address suspected instances of modern slavery. Our annual Statement Against Modern Slavery, which provides more detail on our efforts to ensure that modern slavery isn't taking place in our supply chains and business operations, can be found on our Supplier Responsibility page.

We believe that certain risk factors contribute to modern slavery risk in electronics supply chains. These factors include, but are not limited to, working with suppliers that: operate in countries where modern slavery risks are prevalent, subcontract work, hire foreign migrant workers, and are associated with raw material extraction, hardware manufacturing, and certain indirect services (e.g., food services, janitorial services, and security providers). We regularly 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.

In 2023, we continued work on a product-level risk assessment, which identified Google products that could be associated with modern slavery. We began working with product teams to develop risk mitigation and management solutions for the products identified. We plan to complete this work in 2024. For more information on our ongoing risk assessments and remediations in our supply chain, please refer to our 2023 Supplier Responsibility Report.

We conduct due diligence on suppliers identified as having higher risk based on the assessments described above. Our due diligence process is conducted on a continuous basis; it involves assessing suppliers for social, environmental, and ethical risks, including modern slavery risks. If we discover red flags, we conduct extensive and documented follow-ups to address these issues. In certain cases, we may decide to no longer pursue a relationship or to terminate our current relationship with a supplier.

We work with independent parties to conduct periodic audits of our higher-risk suppliers' facilities. Our audits include in-depth facility review, meetings with management, on-site 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 isn't 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 supplier will resolve the issue, and what steps will be taken to prevent recurrence. In 2023 our suppliers underwent 207 on-site audits. Please refer to our Supplier Responsibility Reports for more information on the audit process, common findings, corrective actions, and more.

We have a dedicated global lead who manages our Supplier Responsibility and Anti-Modern-Slavery programs. 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 Supplier Code of Conduct, as well as relevant laws and regulations. Our Anti-Modern-Slavery program addresses modern slavery risks in the company's supply chains and business operations. Our Chief Compliance Officer maintains oversight of both programs. In 2023, our Chief Compliance Officer provided 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 2023, 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 risk— to the Supplier Responsibility Steering Committee, which comprises our Chief Compliance Officer and leaders from our data center, hardware, and extended workforce business areas. 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 update our online modern slavery training for supplier managers in business units identified as having higher risk in our 2021 modern slavery risk assessment, and continue to educate suppliers on modern slavery risks.

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 2023, we published our seventh annual Supplier Responsibility Report. This report provides detailed information about our above-mentioned efforts.

Finally, 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 we 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.

Data ethics

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

We're committed to promoting transparency and provide detailed reporting at the company level and, where applicable, individual business level regarding our policies, programs, and performance, including:

- Our Transparency Report, which shares data on how we handle content that violates our policies, as well as how we handle government requests for removal of content.
- Our Ads Safety Report, where we explain how we're using evolving policies and better technology to find and remove policy-violating ads.
- Our YouTube enforcement report, which we release on a quarterly basis, with information on channel removals, removal of comments, the policy reasons for removals, and data on appeals.

We outline how we safeguard privacy and security on our safety site and give users control over their information through 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.

In 2019, we introduced auto-delete controls, which give users the choice to have Google automatically and continuously delete their 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. 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 users see. In 2021, we rolled out end-to-end encrypted calling between Android phones on Google Fi and new and stronger safe browsing for Android Messages and Chat. In 2023, we announced changes to Location History and updates to user controls, including, for the users who have opted into Location History, timelines that will be saved directly on a user's device, giving them even more control over their data. For our Gemini models, we've made available an FAQ page, linked from the Gemini Privacy Notice and from Gemini's user interface, that gives more information on how Gemini works, how it collects data, users' rights, how users can exercise these rights, and more. Finally, we published a new Gemini Privacy Help Hub, which gives users centralized access to relevant privacy-related disclosures.

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; strictly upholding responsible data practices that emphasize privacy by design; and building easy-to-use settings that put people in control. We're continually enhancing these efforts over time, 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 as referenced above. 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 legal team dedicated to preventing corruption in the company's business operations and supply chain. The Chief Compliance Officer provides quarterly updates to the Trust & Compliance Council, and relevant updates to 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.

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 2023, Google had a Code of Conduct training compliance rate of 99.18% and an anti-corruption training compliance rate of 98.97%.

- 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 also maintain policies and procedures to implement a risk-based Anti-Money Laundering ("AML") and Counter-Terrorist Financing Program that are reasonably 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, and other related legal obligations. Program requirements include training applicable employees on the BSA/AML program. In 2023, the AML training completion rate was 99.95%.

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.