



Germany GmbH's Policy Statement

pursuant to the German Act on Corporate
Due Diligence in Supply Chains (LkSG)

1. Introduction

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

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

Google Germany GmbH maintains offices in Berlin, Frankfurt, Hamburg, and Munich. Google Germany GmbH primarily provides marketing and sales support services to Google entities in the region. We are issuing this statement pursuant to the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG), which requires Google Germany GmbH to issue a policy statement on its human rights strategy. Google's Human Rights Program advises product teams on potential civil and human rights impacts, conducts human rights due diligence, and engages external experts and stakeholders. As such, this statement is prepared based on activities at the Google level, including specific efforts for Google Germany GmbH as required, and covers our 2023 financial year (January 1 - December 31, 2023).

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

2. Our Commitment to Human Rights

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

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

We expect everyone who works with us—employees, suppliers, and business partners—to conduct business ethically. We have embedded our commitment to international human rights standards and principles in numerous policies and procedures.

- Our [Human Rights Statement](#) provides detail on executive oversight and governance of our Human Rights Program, which includes due diligence, risk management, and engagement with external experts and affected stakeholders.
- Our [Code of Conduct](#) sets forth our expectations for employees regarding privacy, security, freedom of expression, discrimination, harassment, and compliance with all laws, including human rights and 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.
- 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.
- Our third party managed helpline gives our employees and members of our extended workforce an option to report concerns anonymously, including human rights and environmental concerns.
- Alphabet's [Environmental, Health and Safety Policy](#) sets forth our commitment to provide and maintain a safe workplace, while minimizing harm to our people, partners, and planet.
- Alphabet's [Conflict Minerals Policy](#) directs suppliers to perform due diligence on the source and chain of custody of minerals used to manufacture products for Google. We expect our suppliers to source only from conflict-free smelters, such as those that are compliant with Conflict-Free Smelter Program assessment protocols, and work with suppliers to achieve conflict-free sourcing.

3. Governance

The UNGPs emphasize the importance of embedding a commitment to human rights across a company's relevant business functions, policies, and procedures. At Google, our Human Rights Program advises product teams on potential civil and human rights impacts, conducts human rights due diligence, and engages external experts and stakeholders. Furthermore, our Human Rights Program is a central function responsible for ensuring that we are meeting our commitment to the UNGPs, Global Network Initiative Principles, and other civil and human rights instruments across Google and its products.

The Human Rights Program works in close collaboration with the Supplier Responsibility and Anti-Modern-Slavery teams. The Supplier Responsibility team is committed to working with suppliers that treat 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 and relevant laws and regulations. Our Anti-Modern-Slavery team addresses modern slavery risks in our operations and supply chain, and is responsible for Google's compliance with anti-modern-slavery and other relevant human rights due diligence laws.

In 2021, we established a Human Rights Executive 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.

Our Chief Compliance Officer, who leads the Office of Compliance and Integrity (OCI), maintains oversight of the Supplier Responsibility and Anti-Modern-Slavery 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 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. Due Diligence

Our Operations

Google's Code of Conduct sets forth our foundational expectations for employees and members of our extended workforce regarding privacy, security, freedom of expression, discrimination, harassment, corruption, and compliance with all laws, including anti-modern-slavery and human rights legislation. The Code encourages employees to raise questions or concerns and to report suspected violations. We are committed to maintaining a culture that encourages employees and others to report concerns related to violations of our Code of Conduct, policies, or laws, including our human rights commitments. That is why we have adopted and promoted policies that strictly prohibit retaliation of any kind for raising such concerns or for participating in an investigation relating to such concerns.

Our employees and members of our extended workforce are trained on our Code of Conduct. The training covers topics such as how to conduct due diligence to identify and avoid working with third parties that engage in modern slavery or other illegal practices.

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

We educate our employees about the company's human rights expectations and commitments. For example, the Human Rights Program leads training initiatives within Google to educate employees about human rights, and how they can escalate concerns via the correct channels for further review. In addition, employees who manage relationships with our extended workforce and hardware suppliers are trained on our Supplier Code of Conduct and Supplier Responsibility program. Further, the Anti-Modern-Slavery team has developed an anti-modern-slavery training specifically for employees who oversee vendors that a 2021 modern slavery assessment identified as high risk. The training covers modern slavery indicators prevalent in industries pertinent to our supplier base, worker populations most vulnerable to modern slavery, and sample risk scenarios involving modern slavery indicators. The training also explained how supplier managers can better understand the risk profile of the suppliers they manage and how to report concerns.

As part of our risk assessment of Google Germany GmbH's operations under LkSG, we interviewed internal stakeholders and reviewed and assessed company policies, processes, and controls against the LkSG risks. We did not identify any LkSG-specific risk in our Google Germany GmbH's operations.

Our Supply Chain

We conduct due diligence in our supply chain through our global [Supplier Responsibility](#) program. The program is focused on working with suppliers that treat 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 and relevant laws and regulations.

We continually assess human rights risk in our supply chain based on external reports and standards, country and sector risk profiles, previous assessments, and input from experts in this area. In addition, to assess supplier-specific risk, we consider the industry, work type, geography, and supplier performance against our Supplier Code of Conduct, among other factors. We conduct due diligence on suppliers identified as having higher risk based on the assessments described above (collectively, "higher-risk suppliers"). Our due diligence process is conducted 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 work with independent third parties to conduct periodic audits of our higher-risk suppliers' facilities. Our audits include in-depth facility reviews, meetings with management, on-site worker interviews, document reviews, and assessments of related areas, such as dormitories, cafeterias, wastewater treatment facilities, and warehouses. Our audit protocol is designed to assess suppliers' performance in the areas covered by our Supplier Code of Conduct. We also conduct on-site chemical management assessments at suppliers' facilities to verify the efficacy of chemical hazard controls and help suppliers redesign their processes with safer alternatives.

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

We investigate any problems identified during audits, and if a supplier is not meeting our expectations, they must provide a corrective action plan that outlines the root cause of the finding, how and when they will resolve the issue, and what steps will be taken to prevent recurrence. We determine whether the plan is acceptable based on our Supplier Code of Conduct requirements. Lastly, we monitor and verify that all corrective actions are completed in the agreed upon time frame, with a process for escalation to the Supplier Responsibility Steering Team (chaired by our Chief Compliance Officer) if necessary. We also assess the effectiveness of our actions through ongoing monitoring of suppliers whose audit findings reveal potential human rights risks, regularly reviewing and updating our supply chain implementation guidance, and developing tools to better identify populations at risk of human rights abuses within our supply chain.

Our contracts with suppliers include language requiring compliance with our Supplier Code of Conduct, which is publicly available on our website. We also include extensive anti-modern-slavery contractual language in some supplier contracts. We also updated our Supplier Code of Conduct and [Restricted Substances Specifications](#) to better align with industry standards as well as legal and regulatory requirements, including the LkSG.

Pursuant to LkSG, we conducted an abstract risk assessment of Google Germany GmbH's supply chain to identify suppliers who may be most susceptible to potential or actual risks covered in the LkSG. The analysis considered factors such as geography, business models structured around high risk work practices, and sector and industry risks. Taking a risk-based approach, we prioritized this list by focusing on suppliers with whom we have considerable spend.

For the subset of the suppliers that we identified from the analysis above, we conducted a concrete risk assessment which required suppliers to complete an online questionnaire and submit documentation demonstrating policies, procedures, and controls to identify, prevent, and address violations of human rights or environmental risks related to the LkSG. The assessment also included background checks against publicly available databases and media sources for potential human rights, environmental or other serious violations. No violations or concrete risks were identified through these analyses.

5. Addressing Complaints

We have grievance mechanisms at the company and program level. For example, our third-party managed Helpline enables employees and members of our extended workforce to report actual or suspected incidents of misconduct or violations of our policies or Code of Conduct, including human rights concerns. Individuals who raise concerns or participate in an investigation relating to such concerns are protected against retaliation, and individuals have the option of submitting their concerns anonymously. When we learn about a potential violation of our policies or Code of Conduct involving our employees, we carefully investigate 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.

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

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

6. Documentation and Reporting

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

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

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

We will regularly review and adapt this policy statement, as necessary. We will also report in accordance with Section 10 of LkSG.

7. Conclusion

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

A handwritten signature in black ink, reading "Paul Manicle", positioned above a horizontal line.

Paul Manicle, Managing Director, Google Germany GmbH

April 2024