

Google's Policy Against Modern Slavery

Alphabet, Google and its subsidiaries ("Google") are committed to eliminating slavery, servitude, forced or compulsory labor, human trafficking, and child labor (collectively, "modern slavery") in our supply chains and business operations.

Who Must Comply with This Policy

All employees, temporary workers, vendors, contractors of Google and their agents, and businesses who provide goods and services to Google and their suppliers must comply with this policy. This policy is aligned with [Google's Supplier Code of Conduct](#), which establishes expectations for how companies with whom we do business should operate.

Definitions of Forced Labor, Human Trafficking, and Child Labor

The following definitions are derived from the International Labor Organization and the Responsible Business Alliance.

- **"Forced labor"**¹ involves obtaining labor or services through coercion by either direct threats of violence or more subtle means of compulsion, such as accumulated debt or debt bondage, retention of identity papers, threats of denunciation to immigration authorities, or by other abuses or threatened abuses of legal process. Forced labor can occur through any scheme, plan, or pattern intended to cause someone to believe that they or others would suffer serious harm or physical restraint if they did not perform such labor services. The key element of forced labor is a work or service that is exacted from any person under the menace of penalty for which the person has not offered himself or herself voluntarily.
- **"Human trafficking"**² involves the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion, for the purpose of subjecting a person to involuntary servitude, peonage, debt bondage, the removing of organs, sexual exploitation, or other forms of exploitation or slavery. In essence, "human trafficking" means

¹ [ILO CO 29](#)

² [UN Protocol to Prevent, Suppress and Punish Trafficking in Persons](#)

arranging or facilitating the movement of someone with an intention to exploit them. This is true even when the victim initially consents to travel. For instance, a victim may give consent because they are deceived by the promise of a better life or job, or the victim may be a child who is influenced to travel by an adult. Children under 18 involved in commercial sexual exploitation are legally considered victims of trafficking even when there is no demonstration of force, fraud, or coercion. “Human trafficking” also encompasses “sex trafficking,” which includes the recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of a commercial sex act.

- **“Child labor”**³ means work conducted by any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever has the highest age requirement. In addition, “Child labor” includes any work conducted by anyone under the age of 18 which is likely to jeopardize that person’s health, safety, or well-being, including night shifts and overtime.
- **“Foreign Migrant Worker”**⁴ is a person that is recruited and migrates from his or her home country to another country where the person is not a permanent resident for the specific purposes of employment.
- **“Professional Employees”**⁵ are those engaged in work that is predominantly intellectual as opposed to routine mental, manual, mechanical, or physical work; such work involves the consistent exercise of discretion and judgment and the output or result cannot be standardized in relation to a specific period of time.

What Is Prohibited

Knowingly engaging in or supporting modern slavery in our business operations or supply chain is grounds for disciplinary action up to and including termination of employment or business relationship.

More specifically, this policy prohibits doing any of the following in the course of working for or doing business with Google:

- Coercing workers to perform work or activities under the threat of penalty;
- Using forced labor, which includes any practice or conduct which unreasonably restricts a worker’s freedom of movement or right to leave their job;

³ [ILO C138](#); [ILO C182](#)

⁴ [Responsible Business Alliance’s](#) Definition of Fees

⁵ [Responsible Business Alliance’s](#) Definition of Fees

- Using child labor, which is any person under the age of 15, under the age for completing compulsory education, or under the minimum age for employment in the country, whichever has the highest age requirement. Workers under the age of 18 should not perform work that is likely to jeopardize their health, safety or well-being, including night shifts and overtime;
- Using misleading or fraudulent practices during the recruitment of workers, which includes failing to disclose or making material misrepresentations as to the basic details and terms or conditions of employment, such as wages and benefits, work location, living conditions, costs charged to the worker, or the hazardous nature of work;
- Using recruiters who do not comply with applicable laws or [Google's Supplier Code of Conduct](#);
- Making workers pay recruitment fees or other fees for their employment, as described in the "Recruitment Fees" section below;
- Failing to provide workers with an accurate written agreement (i) describing the worker's terms of employment, including the nature of the work, wages, and working hours in a language understood by the worker and (ii) failing to provide at least five days written notice prior to relocating a worker;
- Changing material terms in the agreement upon arrival in the receiving country, unless these changes are made to comply with local law and provide equal or better terms for the worker;
- Destroying, concealing, confiscating, or otherwise denying workers' access to workers' own identity, immigration, or work permit documents, such as a passport or driver's license (regardless of the issuing authority);
- Having direct control of or access to workers' bank accounts other than to make direct deposits of compensation;
- Unreasonably restricting workers' freedom to move into, out of, or within any supplier-controlled facility or workspace;
- Providing housing to workers that violates local housing or safety laws;
- Preventing workers from terminating their employment without financial reprisal or penalty if reasonable notice is given;
- Failing to pay inbound and return transportation costs upon the end of employment for foreign migrant workers, with the exception of Professional Employees (defined above) on assignment and workers with permanent residency;
- Doing business with a vendor, supplier, or customer that you know engages in modern slavery, including any of the practices described above; and

- Procuring commercial sex acts (any sex act for which anything of value is given or received).

Recruitment Fees

A “Recruitment Fee” is a required cost or fee (including service fees) charged to an individual related to their application, hiring, recruitment, or placement. Google prohibits the collection of recruitment fees. For more details, see the Responsible Business Alliance’s [Definition of Fees](#).

If an employee, temporary worker, vendor, or contractor of Google or their agents becomes aware that a Recruitment Fee was charged to a candidate or worker, then a plan for repayment of the fee must be developed immediately and reported to Google.

Child Labor Remediation

Google does not tolerate work that deprives children of their childhood, their potential and dignity, or that is harmful to their physical and mental development. Any instance of child labor should be addressed in accordance with the ILO-IOE [Child Labour Guidance Tool for Business](#). This tool provides direction and refers to further resources on remediating child labor.

Reporting Concerns

If an employee, temporary worker, vendor, or contractor of Google or their agents becomes aware of or suspects behavior that constitutes modern slavery, including child labor, in connection with Google’s business operations or supply chain, they must report it immediately to their designated Google representative.

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