

# Policy Against Modern Slavery

Google Inc. is 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, temps, vendors, and contractors of Google and their agents must comply with this policy.

## Definitions of Forced Labor, Human Trafficking, and Child Labor

“Forced labor” 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. It can be by means of any scheme, plan, or pattern intended to cause the person to believe that, if the person did not perform such labor services, that person or another person would suffer serious harm or physical restraint. The key elements are work or service that is exacted from any person under the menace of any penalty for which the person has not offered himself or herself voluntarily.

“Human trafficking” 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 that the arranging or facilitating of the movement of the individual was with a view to exploit them. This is true even when the victim initially consents to the 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. Indeed children under 18 involved in commercial sexual exploitation are legally contemplated as victims of trafficking, without a 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” means work conducted by any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. 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, that is involuntary,

that is provided under a penalty for nonperformance, or that is performed under an unlawful contract that permits penalties or a process of enforcement.

## What Is Prohibited

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

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

- Using child labor in the performance of contracts, which includes any person under the age of 15 or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 will not perform work that is likely to jeopardize their health, safety, or well-being;
- Procuring commercial sex acts (any sex act for which anything of value is given or received);
- Using forced labor in the performance of contracts, which includes any practice or conduct which materially restricts a worker's or contractor's freedom to leave their job;
- Destroying, concealing, confiscating, or otherwise denying access to an individual's identity or immigration documents, such as a passport or driver's license (regardless of the issuing authority);
- Making workers pay for recruiting fees;
- Using recruiters who do not comply with local laws;
- 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 or costs (if provided or arranged by Google), costs charged to the worker, or the hazardous nature of work;
- Failing to provide a worker with an employment contract or contract for services in writing if required by law or contract, including (i) failing to disclose, in a format and language accessible to the worker, basic employment information and (ii) failing to provide at least five days written notice prior to relocating a worker;
- Failing to provide return transportation or cover the cost of return transportation upon the end of employment, for a worker who is not a United States national and who was brought into the US for the purpose of working on a US government contract or subcontract under certain circumstances;
- Providing housing to workers that violates local housing or safety laws;
- Doing business with a vendor or supplier that you know engages in modern slavery, including any of the practices described above; and
- Establishing or maintaining a commercial business relationship with a customer that you know engages in modern slavery, including any of the practices described above.

In addition to the above, Google's [Supplier Code of Conduct](#) sets forth specific requirements that we expect all of our suppliers and vendors to follow.

## Reporting Concerns

If an employee, temp, vendor, or contractor of Google or their agents becomes aware of or suspects behavior that constitutes modern slavery in connection with Google's business operations or supply chain, they must report it immediately to the Ethics & Compliance team. Remember, Google has a strict policy against retaliation for raising a concern.