

Google

Supplier Responsibility Report 2023



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Supplier responsibility at Google

It's never been more important to promote responsible business conduct within our operations and throughout our supply chain. Increasing climate-related natural disasters, economic pressures, and government and consumer demands continue to raise the bar for corporate responsibility. We remain steadfast in our commitments to ensuring a responsible and sustainable supply chain as part of our larger efforts to foster a culture of responsible business.

As the foundation of our Supplier Responsibility program, Google requires suppliers to abide by our [Supplier Code of Conduct](#). And we conduct audits of our suppliers to make sure they are living up to the expectations we set. We've also invested in ongoing supplier training and education and have equipped suppliers with resources to promote ethical business practices, respect human rights, and uphold safe and healthy workplaces.

While program changes have impeded our ability to achieve some of our stated goals from last year, we've taken this as an opportunity to evaluate our priorities and strategies. As we conduct this in-depth review of our program, we're developing our roadmap for achieving and maintaining a best-in-class supplier responsibility program.

This year, we've also made a few changes to streamline our reporting. In this report, you'll find details of supplier responsibility achievements across our workplaces and communities, centering on the people integral to our work. To see how we're driving positive environmental outcomes, our dedicated [Environmental Report](#) dives into the details—including our goal to achieve net-zero emissions across all of our operations and value chain by 2030 and our work with suppliers on reducing waste, sourcing recycled materials, and responsible water usage.

Our detailed data, analysis, and insights exemplify our hard work, shared commitment, and dedication to being catalysts for positive change across global supply chains. The future holds immense promise, and we're determined to do our part in shaping it.

Spyro Karetzos

Chief Compliance Officer

Ana Corrales

Chief Operating Officer, Devices & Services

Monique Picou

VP, Cloud Supply Chain & Operations

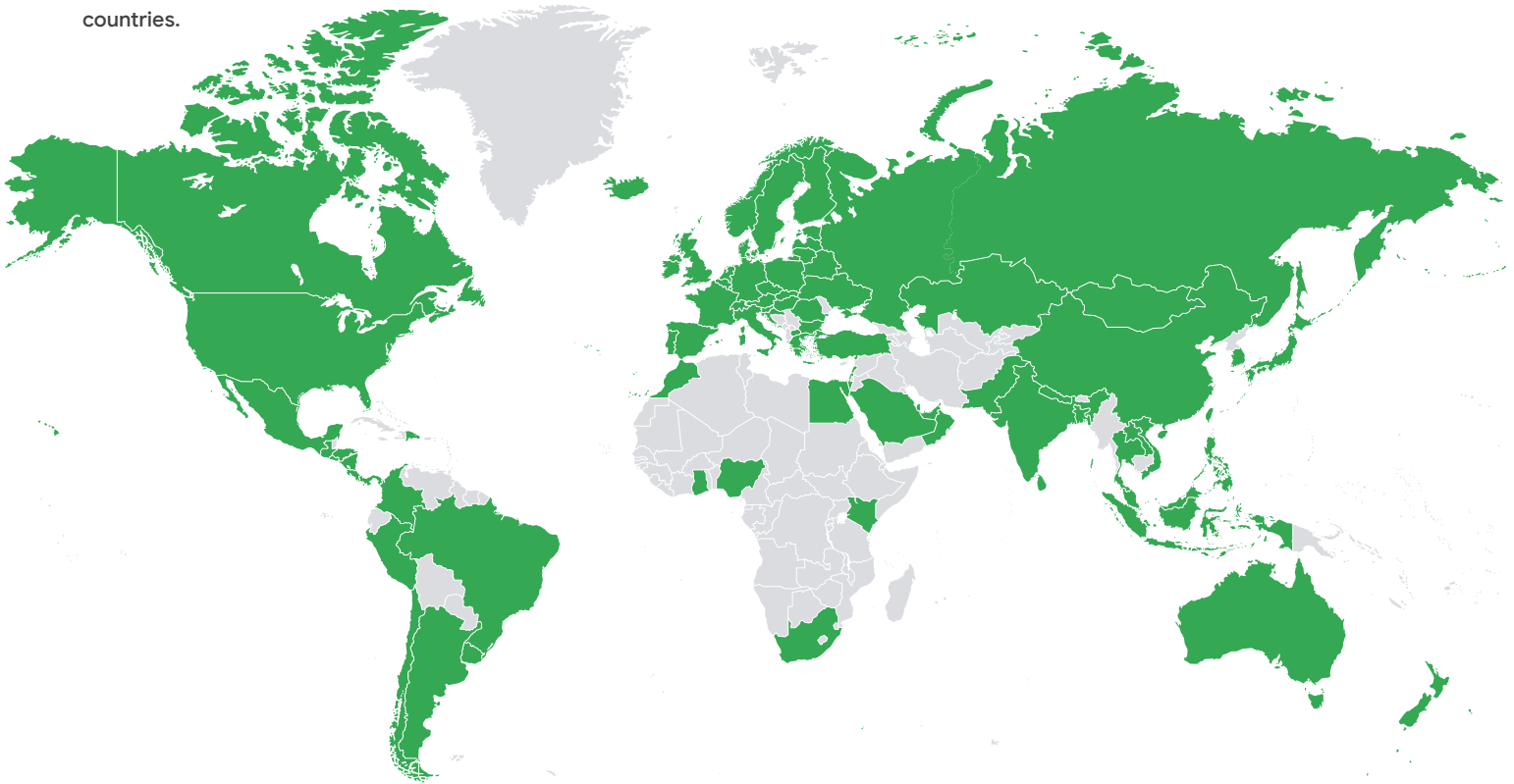
About our suppliers

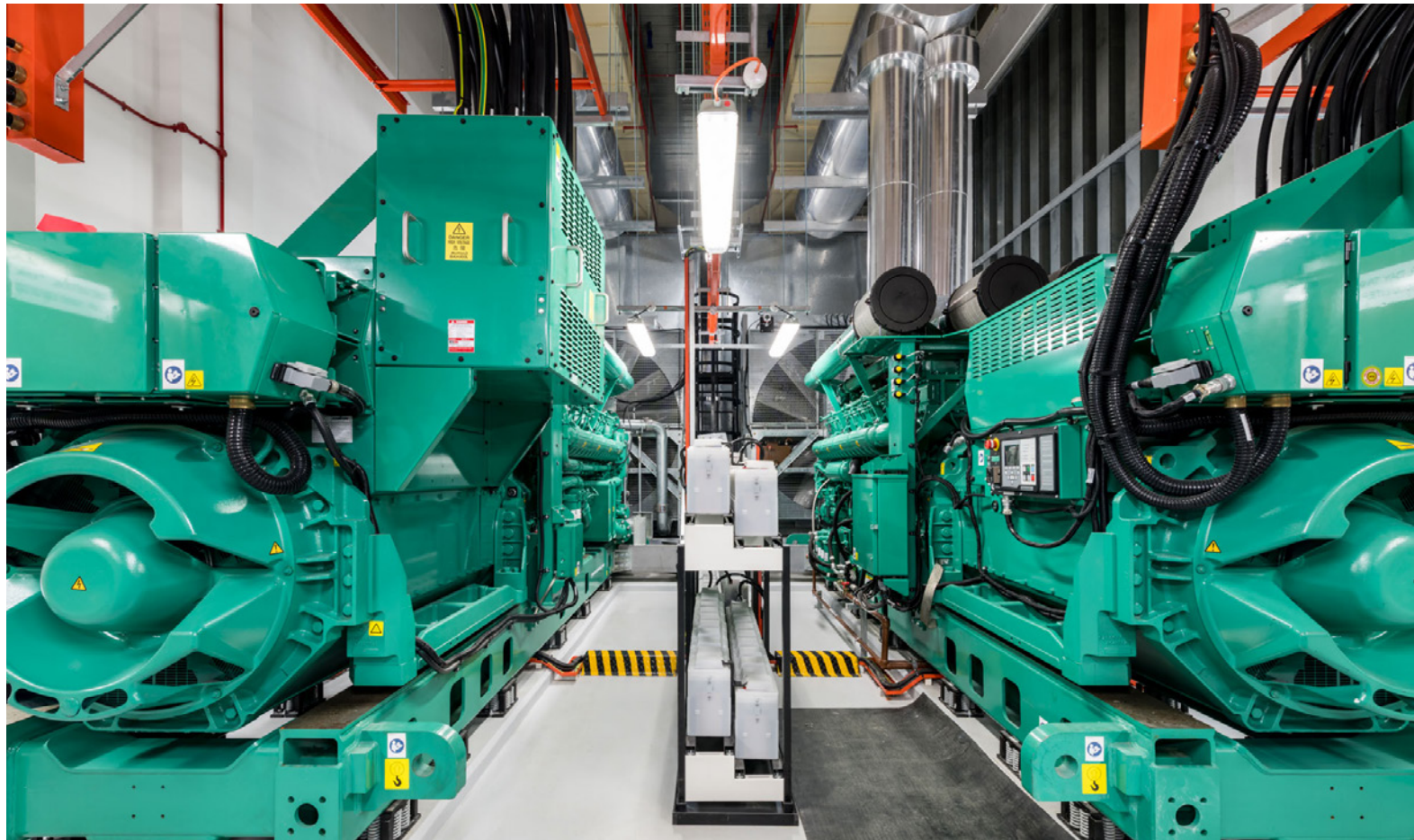
We work worldwide with suppliers that support our business and operations, including hardware manufacturing and indirect services. With the support of our suppliers, Google is able to offer our core products and platforms—[Android](#), [Chrome](#), [Gmail](#), [Google Drive](#), [Google Maps](#), [Google Play](#), [Search](#), and [YouTube](#)—each with broad and growing adoption by users around the world. The hardware in our data centers helps power all of those products as well as a broader set of cloud-based products and services, including Google Workspace collaboration tools and satellite mapping and analysis platforms like [Google Earth](#). Our consumer hardware devices include [Pixel](#), [Nest](#), and [Fitbit](#) products, and other devices.

We work with suppliers in over

80

countries.





About this report

Google formally launched our Supplier Responsibility program in 2012. In 2017, we published our first report, which outlined our framework, tools, and key performance metrics.

This year's report centers on our commitment to support the people and communities within our supply chain. It highlights several key 2022 projects across our supplier network that help illustrate our program's successes, challenges, and aspirations.

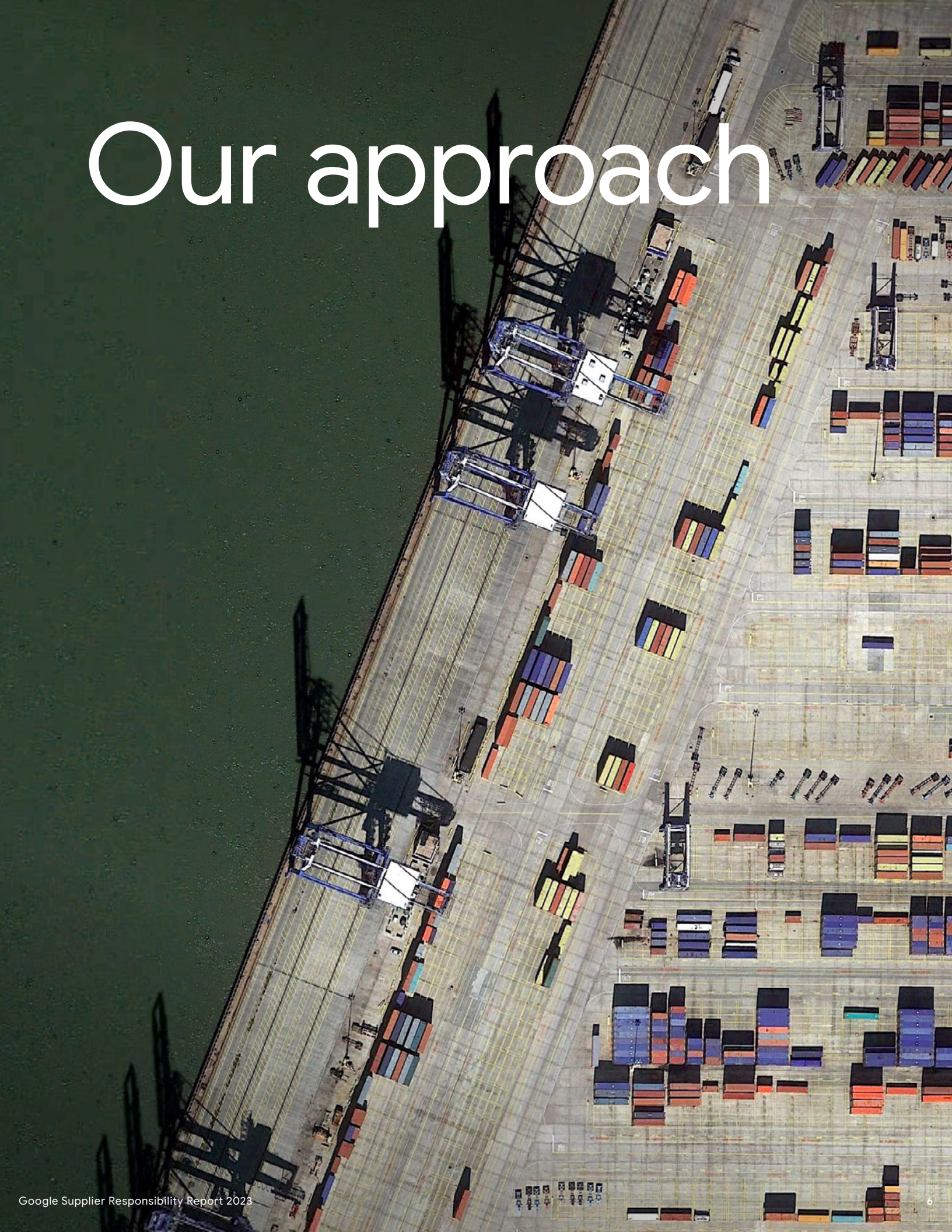
Information about our environmental supplier initiatives and engagement efforts has been consolidated into Google's 2023 Environmental Report.

Read our [2023 Environmental Report](#).

The data in this report covers our 2022 fiscal year (January 1 through December 31, 2022). The majority of the data in this report covers Alphabet Inc. and its subsidiaries, including Google LLC. All reported data is global and annual unless otherwise specified. Our Supplier Responsibility program includes suppliers providing a wide range of products and services. By signing our contracts, suppliers commit to adhering to our [Supplier Code of Conduct](#). Our supplier site assessment program includes primarily hardware, logistics, and extended workforce suppliers.

For more information about our Supplier Responsibility program—including case studies, white papers, and blogs—please see our [Supplier Responsibility website](#).

Our approach





Building the inclusive, tech-forward supply chain of the future

We aspire to create a supply chain model for the future that accomplishes the following:

- **Includes everyone.** We want to collaborate with suppliers and peers across industries and service sectors to create a safer, fairer, and more equitable supply chain.
- **Makes things better.** We want to leave every supplier's workplace, community, and ecosystem that we touch better than we found it.
- **Transforms with technology.** We want to invest in and build technologies to create the world's most trusted supply chain.

Meeting today's urgent global needs

The global COVID-19 pandemic compelled us to adapt swiftly and rise to new challenges to protect the health and safety of every person in our supply chain. Upholding our collective well-being remains our top priority.

In 2022, we continued to support our suppliers in adhering to both local and global COVID-19 guidelines in accordance with our [Supplier Code of Conduct](#), and we enhanced our safety measures in response to evolving recommendations.

Now, as we shift our focus to ongoing safety management, we harness the momentum generated during the initial pandemic to tackle today's most pressing issues: the well-being of people and ecosystems, resource scarcity, and climate change. Our goal is to drive meaningful and positive change across all our value chains. In response to the current challenges, we seek to be highly strategic in how we engage with suppliers, their communities, and the people and ecosystems that are integral to both.

Every decision we make has the potential to affect people, communities, and ecosystems in countless ways. So, at every stage, we strive to understand the interconnected impacts of our supply chain and to be inclusive and restorative across all areas of our work.

This work requires collaboration, both internally and with partners, to determine where we can have the most influence and make the biggest impact. It also requires ongoing transparency, dialogue, and accountability from everyone in our supply chain, along with a willingness to adjust our strategies and continually improve as we learn.

We work across industries to set expectations for ourselves and our suppliers on both social and environmental performance. By investing in areas like worker engagement, renewable energy, transparency in the mineral supply chain, and materials reuse, we're working to create stronger and more resilient communities. By partnering with nongovernmental organizations (NGOs), industry groups, peers, and suppliers, we'll continue our efforts to have a more positive impact on our suppliers and their communities.

Focusing on our people, communities, and planet

Our Supplier Responsibility program spans eight priority areas, which we've organized into three categories: putting people first, strengthening communities, and protecting the planet. This report emphasizes our commitment to the people and communities integral to our work. (Our 2023 Environmental Report addresses the sustainability aspects of our work.)

Putting people first

We're committed to a fair and inclusive supply chain that creates shared value everywhere we operate.

- Treating the people in our supply chain fairly
 - Creating safe and healthy workplaces
 - Operating ethically
-

Strengthening communities

We aspire to strengthen communities everywhere we do business. This includes sourcing minerals responsibly, empowering residents of mining communities to pursue alternative economic opportunities, and ensuring that we support diverse businesses throughout our supply chain.

- Sourcing minerals responsibly
 - Increasing community resilience
 - Advancing supplier diversity
-

Protecting the planet

We're working to build an energy-efficient, low-carbon, circular supply chain that makes smart use of the earth's resources, protects ecosystems, and supports decarbonization. Please see our [2023 Environmental Report](#) for specific insights into our environmental priorities.

- Addressing the climate crisis
- Working to increase resource efficiency and circularity
- Expanding access to clean energy

These areas are interwoven and mutually reinforcing. For example, treating the people who work in our supply chain with dignity and respect creates stronger, more empowered communities. Investing in infrastructure in supplier communities generates more social and economic opportunities and helps reduce reliance on extractive industries such as mining. Replacing dirty energy sources with renewable options reduces greenhouse gas emissions and increases community and global well-being.

How we make it happen

Our program strategy is built on four major pillars that help mitigate risk and benefit people and places through responsible sourcing.

- 1. Supplier Code of Conduct.** Our [Supplier Code of Conduct](#) sets expectations designed to protect the health, safety, and treatment of the people who work in our supply chain. This includes the prohibition of any form of modern slavery, including slavery, servitude, forced or compulsory labor, and human trafficking. Our Supplier Code of Conduct is included in our supplier contract templates, and we expect suppliers to actively drive adherence to the Code.
- 2. Supplier engagement.** Through mechanisms such as supplier self-assessments, risk assessments, and on-site third-party audits, we gauge how suppliers are performing relative to our standards, identify potential risks, and address concerns. We also work closely with manufacturing suppliers to build capabilities in areas like improving environmental performance, providing healthy and safe workplaces, and increasing transparency in the mineral supply chain.
- 3. Community investment.** We work with supplier and upstream communities to minimize the negative impacts of manufacturing, improve lives, and protect the local environment. This includes collaborating with a range of local and global partners, stakeholders, and researchers to ensure community access to clean energy and related economic opportunities. We also work with communities and authorities to support conflict-free mining, including investing in programs that create economic alternatives to mining for local citizens.
- 4. Partnerships.** We partner with NGOs, industry groups, suppliers, and peers to tackle issues bigger than any company could address alone. Our partners bring a wide range of expertise and creative thinking to issues like improving worker well-being, advancing impact sourcing, increasing transparency in minerals mining, reducing reliance on raw materials, bringing electricity to mining communities, and expanding renewable energy markets.



2022 highlights

Putting people first

85

We performed on-site or remote assessments at 85 supplier sites, giving us a cumulative total of 479 site assessments since launching our program.¹

4,500+

Through third-party surveys and interviews, we engaged more than 4,500 people who work in our supply chain, giving us important insights into priorities.

789

At our annual Supplier Responsibility Summit, 789 participants from 234 unique supplier organizations gathered to advance our commitment to supplier responsibility, foster collaboration, and promote ethical practices across our supply chain.

Strengthening communities

100%

For the fifth year in a row, 100% of the smelters or refiners we used for four conflict minerals—tantalum, tin, tungsten, and gold—were Compliant.²

15,000

The 12 projects completed by the Congo Power program between 2018 and 2022 have provided renewable energy access to nearly 15,000 people in the Democratic Republic of Congo.



Putting people first



Overview

We're committed to building a healthy, inclusive supply chain. In practice, this means honoring and respecting everyone who engages with the Google supply chain and striving to ensure that their workplaces promote worker well-being. Our baseline is to ensure that Google treats every person working in our facilities with dignity and respect, maintains safe and healthy workplaces, and holds suppliers to high ethical standards. But our long-term goal is more ambitious: We aim to unlock the power of partnerships and change the dynamic between companies, suppliers, and users so that together we can create a safer, fairer, and more equitable supply chain.

Laying a foundation for fairness

We believe every person working in our supply chain should be treated fairly and with dignity and respect. We accomplish this by deploying policies and processes that are designed to protect the people who make our products and provide valuable services to our company.

The foundation of this work is our [Supplier Code of Conduct](#), which includes our expectations for labor and human rights, health and safety, environmental responsibility, and ethics and compliance. We expect all suppliers in our operations and supply chain—and their suppliers—to ensure that employment is freely chosen and that their employees pay zero recruitment fees. Our suppliers also must prohibit the use of child labor, guard against sexual harassment and verbal abuse, prevent discrimination, and support freedom of association and collective bargaining rights.

We hold suppliers accountable to our Supplier Code of Conduct through a multi-step assessment process, which includes self-assessments, risk assessments, and independent third-party audits that allow us to detect areas of nonconformance. See [page 21](#) for more detail on our site assessment processes and performance.

Engaging the people in our supply chain

The employees working for our suppliers often provide some of the most valuable insights into what's working and what needs improvement. That's why hearing directly from them is a crucial component of our audits and broader supplier engagement. In 2022, our worker engagement program centered on understanding employees' challenges and concerns, particularly regarding our Supplier Code of Conduct. We seek to promote positive and healthy workplaces that support personal and professional growth. As we gather feedback, we plan to prioritize the areas of highest importance to supply chain workers and address their concerns, ensuring that our supplier engagement program accurately reflects their needs. By offering continued support, we can help our suppliers create and maintain healthy organizational cultures and work environments.

Empowering the voices in our supply chain

To hear directly from the people in our supply chain, we gather feedback through anonymous worker surveys and face-to-face interviews. A comprehensive survey, customizable to each supplier, invites workers and supervisors to share their anonymized concerns and satisfaction in areas such as working conditions, health and safety, wages and benefits, working hours, and communication with management. We also release a standardized questionnaire to gauge general sentiments of the people in our supply chain.

In addition, we encourage suppliers to participate in the Responsible Business Alliance (RBA) Voices worker surveys. We coordinate with suppliers and deploy the worker surveys via QR codes, a method that is widely accessible to workers and easily scalable globally. The collective results increase transparency, provide detailed insight into working conditions within our suppliers' facilities, and inform concrete actions we can take to improve them.

We heard directly from more than 4,500 people throughout our supply chain via our third-party audit process or worker surveys in 2022.

Advancing opportunities for the people in our supply chain

In 2021, we developed a worker capacity-building initiative, which launched in 2022, to support the personal and professional development of the people who work in our supply chain. We partnered with suppliers to provide a digital and interactive learning experience to production workers and frontline supervisors via the RBA Voices app, specifically designed to bolster engagement. Within the app, Google creates custom learning maps that aim to improve workers' health awareness and leadership and communication skills to promote healthy team dynamics.

We're continuing to design our holistic, long-term approach to advancing workplace well-being. In partnership with our suppliers, we're working to improve health equity for vulnerable groups and to integrate healthy workplace practices that promote individuals' mental and physical well-being.

Creating safe and healthy workplaces

Workplace safety is a top priority, now more than ever. We remain committed to ensuring that everyone who makes our products or provides us with services works in a healthy and safe environment. In accordance with our Supplier Code of Conduct, our suppliers are expected to maintain safe and healthful workplaces that comply with all applicable laws and to implement a management system for identifying and resolving related issues.

Suppliers and their health and safety management systems must identify, evaluate, and control worker exposure to all safety and health hazards—including chemical, biological, physical, and ergonomic stressors—and suppliers must provide proper design, controls, procedures, and guidance in factory production and other work environments. We also expect suppliers to plan for potential emergencies and provide the people in our supply chain with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. If provided, housing facilities must be clean, safe, and fair and include adequate personal space and hot water for bathing and showering.

In 2022, we continued to require suppliers to maintain their commitment to evolving COVID-19 management practices in accordance with local guidance. These requirements include the ongoing implementation of safety measures, such as having a preparedness and response plan for infectious diseases, enforcing infection prevention protocols, establishing procedures for identifying and isolating individuals showing symptoms, advocating for workplace flexibility and protective measures, and continuously monitoring and evaluating their strategies and plans.



Driving healthier manufacturing processes

We're committed to helping our suppliers protect their people and promote environmental health and safety in their communities. We continue to work with our suppliers and industry partners to identify and eliminate harmful substances from our manufacturing process by giving our suppliers the knowledge and support they need to transition to safer alternatives.

In 2017, we began incorporating substances from our Manufacturing Restricted Substances List (MRSL) into our [Restricted Substances Specification](#) for consumer hardware. To further support this initiative, in 2018, we launched an MRSL assessment and declaration program, along with comprehensive training, to request information from our suppliers on their use of manufacturing restricted substances (MRS). In addition, we started conducting on-site chemical management assessments (CMAs) at suppliers' facilities to verify the efficacy of chemical hazard controls and provide consultation to help suppliers successfully redesign their processes with safer alternatives. For any supplier that fails to meet the minimum requirements of Google's safety standards, we create corrective action plans (CAPs) that outline specific action items for resolution. Our Responsible Chemical Management team monitors supplier CAP progress to ensure that all findings are thoroughly addressed.

SPOTLIGHT

A proactive approach to safer product materials

Making safe electronics requires a comprehensive understanding of potential chemical hazards—beyond those currently regulated. However, the assessments needed to find safer options have historically been costly and limited in scope. By creating a repository of hazard assessment data, we can share critical information across the industry, accelerating innovation and fostering a safer chemistry landscape for the entire sector.

Learn how our [recent work with ChemForward](#) is improving access to essential assessment data and tools to develop safer products.

In 2022, we conducted five on-site CMAs at supplier sites. Across the sites, we noted 30 findings, all of which have since been fully resolved. Since the launch of our CMAs, we have guided suppliers to resolve a total of 226 issues, strengthening their overall chemical management systems and practices.

In 2020, we expanded our Responsible Chemicals Management program by developing and implementing the Process Chemicals Full Material Disclosure (FMD) Data Collection and Assessment program for key suppliers. This program gives us an in-depth understanding of what and how process chemicals are used during manufacturing or maintenance. The FMD program collects data on chemical use during manufacturing and evaluates occupational exposure risks from hazardous chemicals so we can help suppliers minimize the risks of and phase out restricted substances.

After completing FMD training and data collection for 21 key contract manufacturing facilities in the first year, we expanded the program to new final assembly manufacturing sites. In 2022, we evaluated 23 additional facilities and broadened our evaluation to include 156 chemical processes that we assess for their applications and exposure control measures. Based on follow-up investigations with suppliers, we've provided consultation and facilitated safer substitutes for chemicals of higher toxicity. This effort has helped create safer working conditions for the nearly 2,800 people who work directly with the chemicals.

In addition to performing ongoing assessments, maintaining safe chemical management also hinges on comprehensive supplier education. In 2021, we issued two new guidance and specification documents aimed at helping suppliers identify, assess, and mitigate occupational risks related to chemicals used in the manufacturing process. The new guidelines require suppliers to comply with Google's MRS specifications for all products and components they manufacture or provide to Google. Manufacturing sites must establish and implement a chemical management program to evaluate the purchase, use, transportation, and disposal of all hazardous chemicals. In addition to training and engaging the people who work with chemicals, suppliers must also perform job hazard assessments to ensure control mechanisms protect their people and the environment.

Building on this foundation, we made significant strides in supplier education during 2022. We enhanced our online training on responsible chemical management (RCM), incorporating it into the RBA platform in both English and simplified Chinese versions. Since the program's inception, nearly 250 suppliers have successfully completed our RCM training, with 45 completing it in 2022 alone. These trainings are mandatory for selected suppliers, which we determine based on MRS responses and RCM guidance.

In 2022, we also began identifying strategic suppliers to promote RCM practices throughout their own supply chains.

Setting a high bar for ethics

We expect our suppliers to uphold high ethical standards, including not engaging—directly or indirectly—in corruption, bribery, extortion, embezzlement, or other illegal practices. To meet these standards, we encourage companies to disclose information about their business activities, financial situations, and performance in line with regulations and industry practices. We also expect our suppliers to protect Google’s intellectual property and confidential information from attacks by third parties.

Addressing ethical conduct and preventing modern slavery

In 2021, we established a Human Rights Executive Council, composed of senior leaders across relevant product areas and functions, and headed by our president of global affairs and chief legal officer. The Council oversees the implementation of our civil and human rights work, including the prevention of modern slavery.

Forced labor, indentured labor, debt bondage, and other forms of modern slavery can occur in industries with many workers and few regulations. We have zero tolerance for any form of modern slavery in our supply chain.

Our contracts require Google suppliers to comply with laws against international human trafficking, forced labor, and modern slavery. We reserve the right to audit any facility where modern slavery is reported and to terminate our agreements for any violation of these policies.



Each year, we hold a Supplier Responsibility Summit to exchange insights, align on sustainability objectives, and reinforce our shared commitment to responsible sourcing. We cover how to advance healthy, fair workplaces; accelerate affordable, accessible clean energy; and drive circular, waste-free operations.

During our Summit in April 2022, we conducted two sessions specifically focused on educating our suppliers about forced labor. Both were designed to empower our high-risk suppliers with the knowledge and tools they need to proactively identify and mitigate potential risks within their own operations and supply chains. In total, 789 participants from 234 unique suppliers met at the Summit—a 165% increase in unique suppliers from the prior year. This growth in attendance showcases our supply network’s shared commitment to addressing critical social and environmental issues.

We also train our vendors, temporary staff, and independent contractors to report concerns of illegal or unethical activity and to avoid working with parties that engage in modern slavery or other illegal practices. In addition, we have an online training course that includes anti-modern slavery education for people who work in roles related to hardware supplier management.

Our anti-modern slavery program maintains our commitment to supply chain integrity. For more information, please see our [Policy Against Modern Slavery](#), which defines modern slavery, lists prohibited actions, and provides channels for reporting suspected instances.

Read our [2022 Statement Against Modern Slavery](#).

Assessing conformance with our Supplier Code of Conduct requirements

We follow a multi-step process for evaluating our suppliers. Performing regular assessments helps us address potential issues early on and support our suppliers in taking corrective actions.

Supplier self-assessment process

Self-assessments kick-start the evaluation and risk assessment process. We ask all new suppliers to complete a detailed self-assessment that helps gauge their understanding of and commitment to our expectations. The companies' responses help us identify potential risks of nonconformance with the requirements in our Supplier Code of Conduct (SCOC) and provide a launching point for suppliers to critically consider their own social and environmental impacts.

Many suppliers already have strong programs to address our requirements. When a self-assessment indicates that a supplier does not meet our expectations, we work with the supplier to ensure it develops programs to address our concerns.



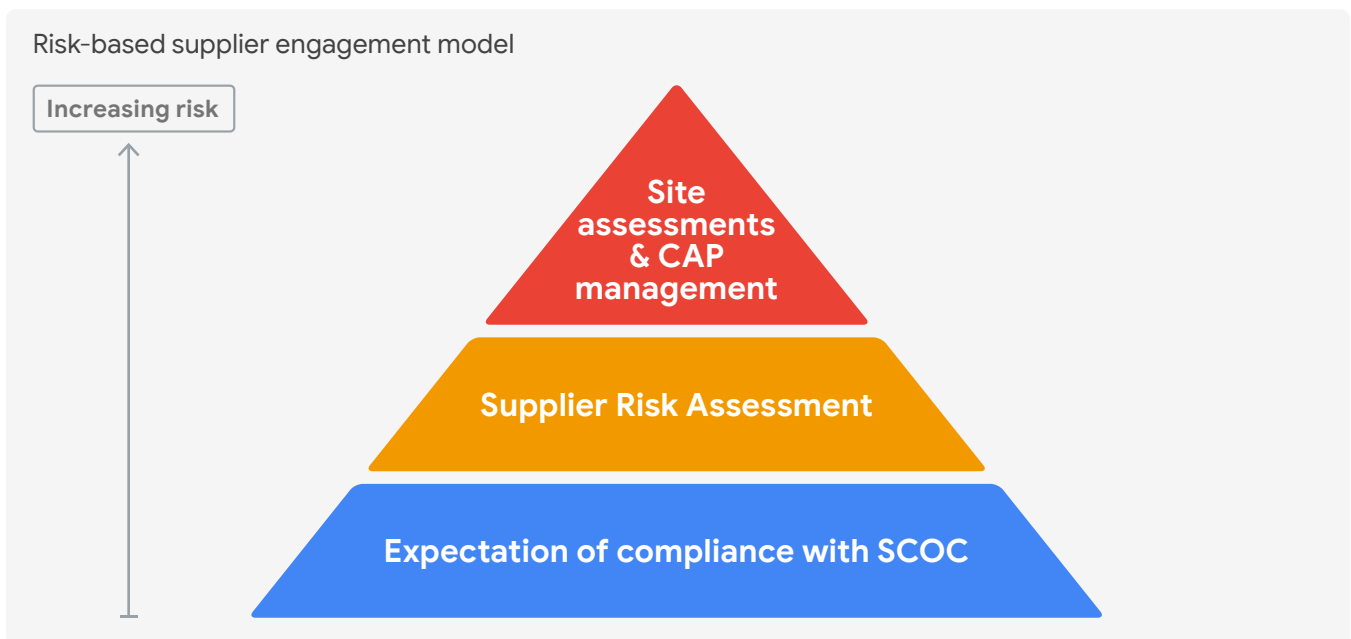
Understanding and evaluating risks in our supply chains

Along with having suppliers evaluate their operations, we perform our own ongoing due diligence to verify compliance and understand our supply chain's current and potential risks.

Our extensive Supplier Risk Assessment process evaluates the social, environmental, and ethical risks of working with individual suppliers or groups of suppliers. The results give our supplier managers insights to help them make better-informed sourcing decisions and proactively manage their supplier relationships.

When performing a Supplier Risk Assessment, we look at a variety of factors, such as:

- **Country-level risks.** Are certain countries at higher risk for certain types of social or environmental risks?
- **Product- and service-specific risks.** Do suppliers use chemically intensive manufacturing processes? How physically demanding is the work involved?
- **Supplier fines or convictions.** Has the supplier previously been fined for human rights, environmental, or corruption violations?
- **Google's supplier-engagement efforts.** Has the supplier submitted a self-assessment? If problems were found during an audit, has the supplier taken steps to resolve them?
- **Supplier relationship.** How strategic is the supplier to our business? Do we influence the design of the product or the selection of the components?



2022 audit overview³

85

Supplier site assessments

1,111

Nonconformance issues identified

Managing supplier adherence to our SCOC: Site assessments

Findings from the self-evaluation and initial Supplier Risk Assessment determine whether we need to conduct additional assessments at the suppliers' facilities. We prioritize on-site audits for our contract manufacturers, original equipment manufacturers, and suppliers identified as high risk.

Every SCOC audit is conducted by an approved third-party audit firm to assess conformance with Google's SCOC and applicable laws and regulations. We also encourage our suppliers to participate in RBA [Validated Assessment Program](#) (VAP) audits. The audits include in-depth factory, facility, and dormitory tours; management meetings; on-site worker interviews; and reviews of the supplier's documents and records.

In 2020, we implemented remote assessments that have since allowed us to continue evaluating high-risk suppliers in locations where COVID-19 made it difficult for our third-party assessment teams to visit sites. Our Targeted Desktop Assessments (TDAs) focus on a remote desktop review of a supplier's management system to assess whether that supplier has policies and procedures to address our SCOC requirements.

These assessments of our suppliers' facilities allow us to determine whether the supplier is meeting our standards, hear directly from the people in our supply chain (in the case of on-site assessments), and identify opportunities for our suppliers to address issues. Our audits also provide valuable opportunities to raise suppliers' awareness of their social and environmental responsibilities, promote accountability, understand leading practices, and encourage greater transparency.

Since the inception of our program in 2013, we have performed 479 on-site and remote assessments.⁴

Our supplier site assessment types

SCOC audit

On-site assessment performed by a third-party audit firm and managed by Google.

RBA VAP audit

Validated Assessment Program (VAP) audit conducted by an RBA-approved, third-party auditor.

TDA

Remote desktop assessment performed by a third-party audit firm and managed by Google.

Using audits to identify—and correct—noncompliance

When we find that a supplier is not conforming, we expect that supplier to provide a corrective action plan (CAP) that outlines the root cause of the finding, how and when that company will resolve the issue, and what steps it will take to prevent recurrence. We determine whether the plan is acceptable based on the severity of the nonconformance and the effort and time required to resolve the issue.

We expect suppliers to demonstrate improvements to continue working with us. Our goal is to resolve the most severe issues immediately. We expect all other findings to be resolved in accordance with our guidelines as quickly as is practical. While we work with our suppliers to help them address our findings, in some instances, we may decide to no longer pursue a relationship or to terminate our current relationship with a supplier.

Once a CAP is approved, we expect the supplier to provide evidence of resolution and commit to maintaining those improvements over time, which may require follow-up verification. Once the supplier is able to demonstrate that it has successfully implemented the approved CAP, we change the plan's status to "closed" and continue to monitor for risks at the supplier site.

Guidelines for corrective action plans (CAPs)

1 Create

Google: Provides an audit report to the supplier with identified nonconformance issues

Supplier: Provides a root-cause analysis and proposed CAP within applicable deadline (within 30 days of receiving finding or sooner for Zero Tolerance and Priority findings)

Google: Reviews the completed CAP and signs off on acceptability

2 Implement

Supplier: Begins to implement the CAP in accordance with the agreed-upon timelines, depending on the severity of the nonconformance issue

Google: Monitors CAP implementation and provides guidance as needed

3 Monitor

Supplier

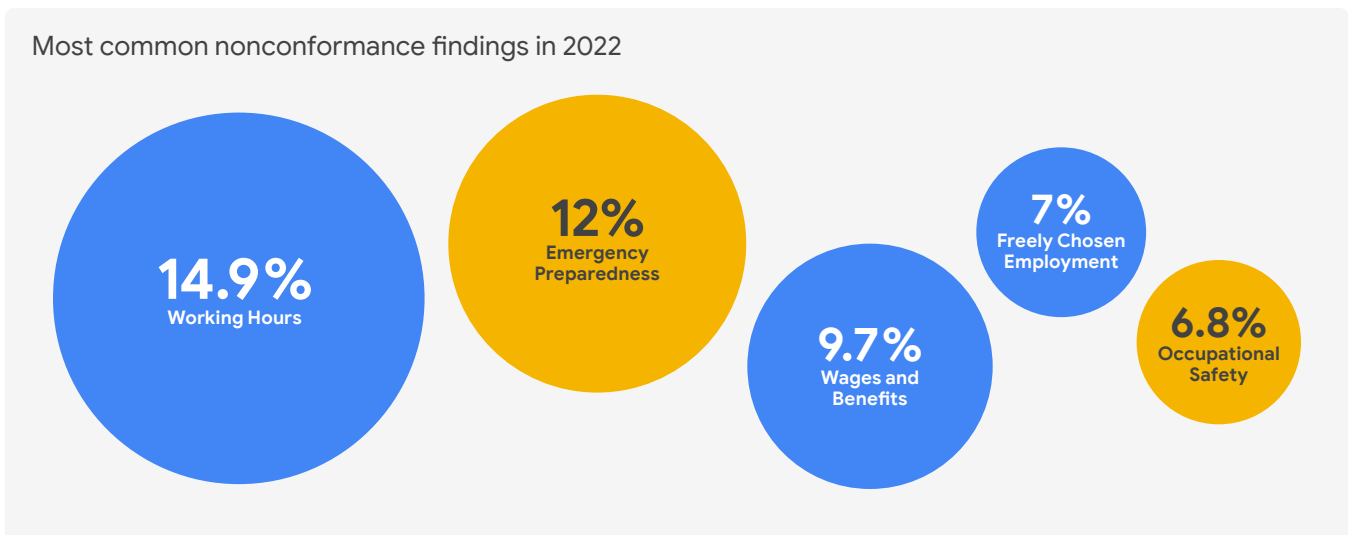
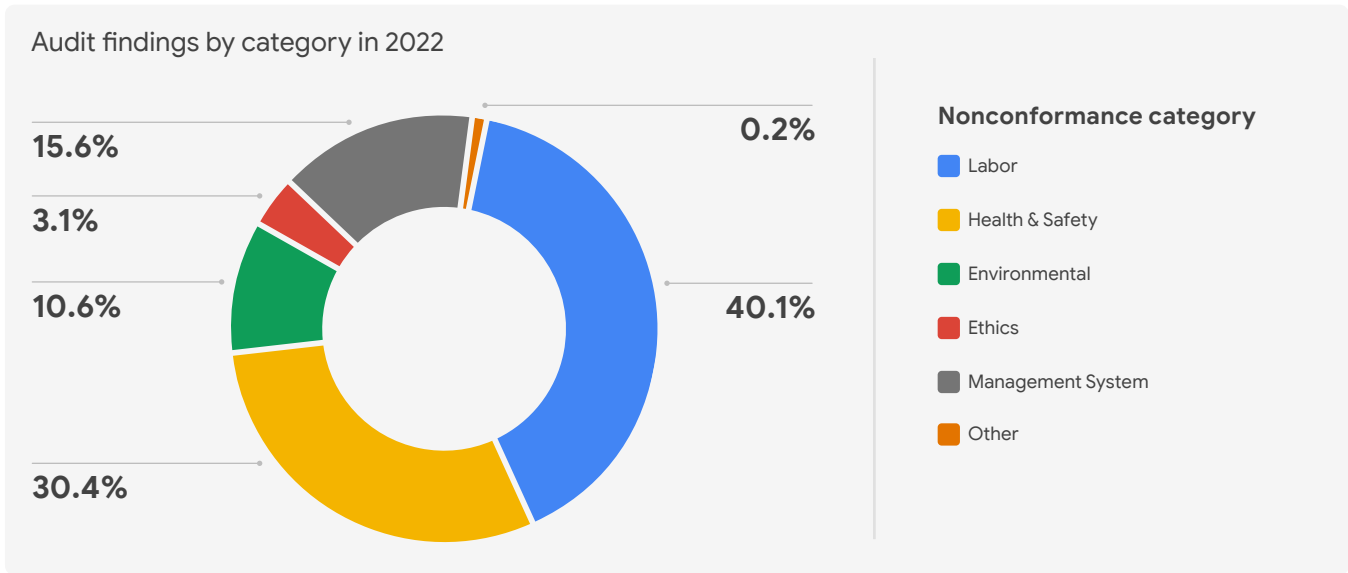
- Monitors and reports the status until closure
- Continuously monitors and corrects any issue

Google

- Provides guidance as needed
- Reviews final evidence of implementation and notifies the supplier if the CAP has been accepted or requires follow-up
- Escalates overdue findings
- Audits again, as needed, for Zero Tolerance, Priority, and Major findings

Most common nonconformance findings in 2022

Because we frequently add and audit new supplier sites, the percentage of findings within each category and the most common types of findings tend to be similar from year to year. While we actively work to reach 100% conformance, the remaining nonconformance findings may include ongoing, overdue CAPs due to delays caused by the pandemic or other challenges in working with the supplier to address the nonconformance findings.



Working Hours

In 2022, we found the most instances of nonconformance within the category of Working Hours—an area of continued focus within the industry. Working excessive hours strains employees' physical and mental health, increasing stress levels and risk of injury and accidents, while also impairing personal relationships. In order to ensure the people in our supply chain rest enough between shifts, workweeks should not exceed 60 hours (including overtime) or should comply with the maximum set by local law, whichever is the stricter standard. Employees must also be allowed at least one day off every seven days. As we continued to see pressures on working hours from the pandemic and related labor shortages, we found an overall conformance rate of 80%. This result was driven by a 57% increase in conformance after implementing CAPs at supplier facilities to address findings related to Working Hours.

Emergency Preparedness

Our audits aim to protect the people in our supply chain from threats to workplace health and safety wherever possible—including those beyond our control. Emergency Preparedness was the second most common area where we found nonconformance issues in 2022. We require supplier facilities to adhere to fire codes, maintain adequate fire alarm systems, and practice emergency-response drills. Facility managers must train their employees to sufficiently detect potential emergency situations and follow response plans and procedures that focus on minimizing harm to people, property, and the environment. After CAP implementation, we found 91% of audited suppliers in conformance with these standards.

Wages and Benefits

We expect that everyone who works in our supply chain receives fair compensation and require our suppliers to pay their employees all legally required wages and benefits; this includes laws related to minimum wage and overtime compensation. The most common Wages and Benefits nonconformance findings related to lack of compliance with providing all required social benefits. After CAP implementation, over 89% of audited suppliers were in conformance with the expectations outlined in Google's SCOC.

Freely Chosen Employment

In addition to ensuring that workers are not subjected to unreasonable overtime expectations, we require that their conditions of employment are freely chosen: Workers' employment must be their decision—and theirs alone. Freely Chosen Employment continues to be an important focus area. Our findings included issues related to inadequate communication of critical employment terms in workers' native languages, especially for migrant workers, and insufficient policies to prevent forced labor in the manufacturing process at any stage. After successful CAP implementation, we saw a 41% increase in the number of supplier facilities meeting our standards, resulting in 91% of audited suppliers being in conformance.

Occupational Safety

To prevent injury and illness from workplace hazards—chemical, electrical, fire, vehicular, and others—suppliers must provide employees with appropriate protective equipment and procedures in compliance with our Occupational Safety requirements. When supplier facility managers cannot eliminate hazards or control them with procedural redesigns or substitutions, suppliers must provide all employees working directly with the hazards with sufficient protection, such as personal protective equipment and ongoing training. More than 95% of audited suppliers were in conformance with our Occupational Safety requirements.

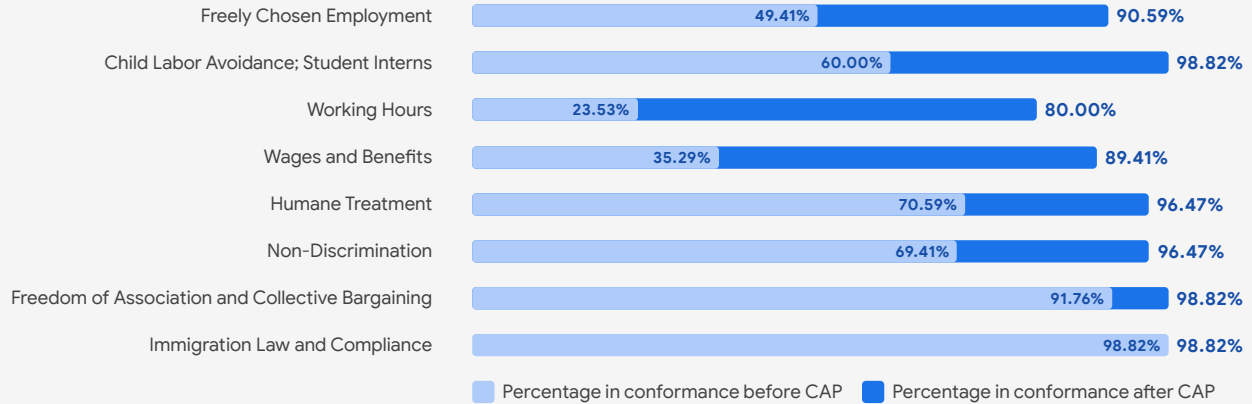
The more we equip suppliers' employees with the necessary tools to identify, mitigate, and manage workplace risks, the safer their jobs—and the better their overall well-being.



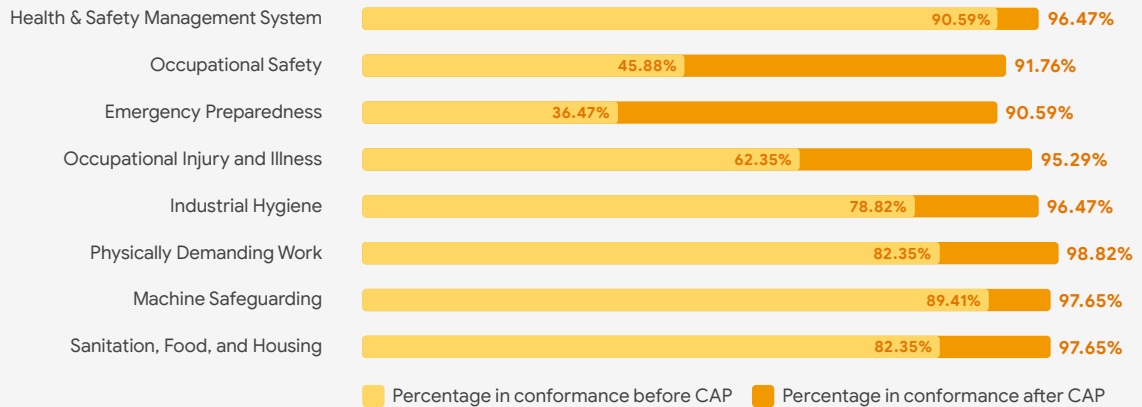
2022 audit conformance data

In the table below, the lighter bars show the percentage of unique audited supplier facilities that had no findings for the listed criteria after their audit. The darker bars show the percentage that had no findings after the corrective action plan (CAP) process was completed.

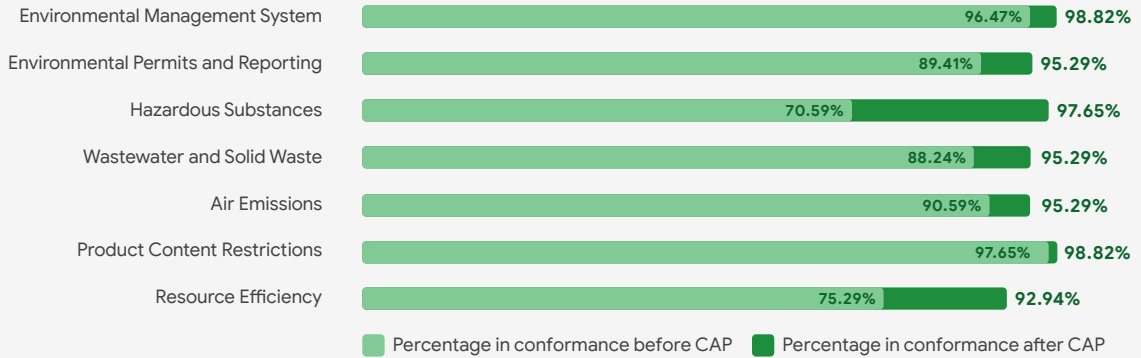
Labor



Health & Safety



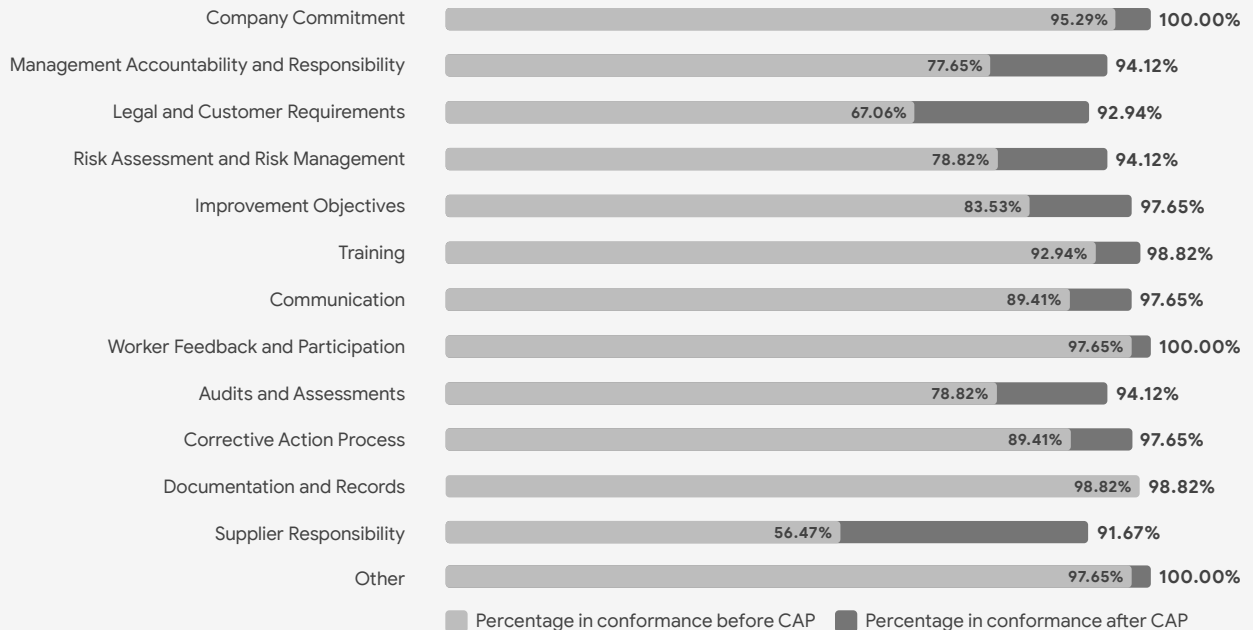
Environmental



Ethics



Management System





Strengthening communities



Overview

We aspire to create stronger, more resilient communities everywhere we do business. We're taking action on more responsible sourcing of raw materials, including making broad, multi-industry commitments to ensure that minerals are mined responsibly. We're also working on strategies to responsibly transition into and out of supplier communities, including investing in local infrastructure and vital services so that people have access to economic opportunities beyond mining and manufacturing. As we work to end our reliance on raw materials altogether, these investments may prove critical to helping these communities persist and adapt in the face of change. Our supply chain should do no harm. Beyond that, we strive to leave communities better than we found them.

Sourcing minerals responsibly

We take proactive measures to manage the social and environmental impacts associated with the sourcing and extraction of raw materials for our consumer hardware devices and data center equipment. This includes sourcing minerals for our electronics—specifically tin, tantalum, tungsten, and gold—exclusively from mines that aren't financing armed conflicts in the Democratic Republic of Congo (DRC) and other high-risk locations. We are also working to ensure the responsible sourcing of cobalt for all batteries incorporated into our products.

We launched our Conflict Minerals program in 2012 to improve transparency and develop conflict-free sources of these materials. From the beginning, our strategy has been to work collaboratively with governmental organizations and NGOs across the electronics industry and others to enable conflict-free sourcing for everyone. We're one of more than 400 members of the Responsible Minerals Initiative (RMI), which provides independent third-party audits to ensure that smelters and refiners meet current conflict-free standards.



Five straight years
of working with

100%

Compliant⁵ smelters or
refiners of tin, tungsten,
tantalum, and gold

As noted in [Alphabet's Conflict Minerals Report covering 2022](#), for the fifth year in a row, 100% of the smelters or refiners we used were conformant, active,⁶ or verified by a third party as sourced from countries other than those covered in the 2010 Dodd-Frank Act (collectively referred to as "Compliant" smelters or refiners for the purposes of this report).

We are committed to zero child labor in our supply chain, including in mining. In addition to focusing on tin, tantalum, tungsten, and gold, we are working with peer companies and partners to help ensure zero child labor in cobalt mining and to strengthen cobalt tracing. In 2022, we joined the Fair Cobalt Alliance (FCA), a multi-stakeholder initiative that seeks to drive the development and supply of fair cobalt by remediating the root causes of its highly hazardous working conditions: widespread poverty. By mobilizing the resources of the whole supply chain, the FCA is driving the development of the DRC to create sustainable livelihoods for as many community members as possible.

Empowering minerals transparency

To continue to build visibility into the source of every mineral used in the electronics industry, we invest in ways to make the minerals-tracking process more transparent for everyone along the supply chain. In 2020, we built on the success of our 2018 blockchain technology pilot with a phase two blockchain pilot in Rwanda. In 2021, we focused on expanding this blockchain traceability work to connect more upstream and downstream suppliers that build Google products. In 2022, we began Phase 3 of our blockchain traceability project to pilot tracing tin from products to smelters. The team also added additional focus on tracking other impacts associated with mining, beyond conflict: social impacts, such as gender inequality, and environmental impacts, such as carbon emissions.

As a global team, our focus remains on furthering an open collaboration model that any industry player can join, one that inspires greater traceability across the mining and minerals industry and better connects our value chain and handoffs—mine to supplier to consumer device.

Increasing community resilience

Roughly 44.7 million people work in artisanal and small-scale mining,⁷ and many have few options outside the minerals trade. Reducing our reliance on mining will have many potential impacts on mining communities and the people who work in the extractives industry. As we begin to understand these consequences more fully, we're investing in select communities to enhance local infrastructure and empower people to pursue alternative livelihoods.

In collaboration with nonprofit, academic, technical, and community partners, our initial investments have focused on solar energy projects in the DRC, where only 9% of the nation has access to electricity.⁸

In 2022, we continued to support the Panzi Foundation, specifically its Mulamba Hospital, which provides a lifeline for women in need. The hospital offers vital services, including gynecology and care for survivors of gender-based violence. Congo Power financed the deployment of a 20-kilowatt energy system to power vital electrical medical supplies, such as incubators in the maternity ward and refrigerators for vaccine storage.

Additionally, we supported the Forgotten Parks Foundation's initiative to empower women living near conserved parks disrupted by artisanal mining. The foundation is working to establish local fish trading businesses, which provide sustainable sources of income and improve livelihoods in the communities surrounding Lake Upemba within Upemba National Park.

Since the Congo Power program began in 2018, our team has launched 14 community power projects and completed 12,⁹ delivering power to nearly 15,000 people in the DRC as well as conservation areas and national parks that are of critical importance to the Congolese and the planet. Access to renewable energy has sparked social, economic, and environmental growth throughout the region. Energy distribution from the power grids has improved nighttime safety and security, health care access, and cross-town collaboration that together are creating new entrepreneurial opportunities and strengthening community resilience.

“Google is very excited to support the delivery of renewable energy solutions for many people who live in conflict-affected and high-risk areas through the Congo Power program. We believe that energy unlocks opportunity and distributed electrical energy solutions are critical in enhancing access to energy for people who have never had access to electricity. Congo Power is committed to supporting the learning journey so that responsible solutions that are contextually relevant are competitive in the marketplace.”

Baraka, Program Manager,
Social Impact, Supply Chain

We ended up spending

\$2.8 billion

with suppliers from diverse backgrounds, exceeding our 2022 goal.

These pilot projects play a pivotal role in shaping our approach to scaling the Congo Power initiative. As we continue to explore new solutions and approaches to strengthening the resilience of communities that source minerals responsibly, Congo Power has set an example that informs others’ journeys in our collective work to catalyze positive change within the minerals trade.

To continue to advance this work, in 2022, we transitioned the leadership of the Congo Power program to the Public-Private Alliance for Responsible Minerals Trade (PPA)—a multi-sector initiative between leaders in civil society, industry, and government that supports projects in the DRC and the surrounding Great Lakes Region of Central Africa to improve the due diligence and governance systems needed for ethical supply chains. Transitioning Congo Power from a Google-owned initiative to a Google-sponsored project of the PPA enables us to collaborate with our peers on projects that strengthen the resilience of communities in areas affected by the minerals trade.

Together, we’ll continue to support community-led efforts and to deepen our collaborations with RMI and the Panzi Foundation to address the nexus of conflict, minerals mining, and women’s empowerment and livelihoods in the DRC. We’ll continue to expand real-time impact and data dashboards on key metrics. Looking ahead, we are actively seeking new opportunities to amplify our impact and further harness the potential of the industry.

Advancing supplier diversity

Google is committed to advancing supplier diversity, equity, and inclusion in how we conduct business globally. We want to help build an inclusive economy that works for everyone. This extends throughout our company and accounts for the economic impact we create when we buy goods and services. That’s why we’re providing access, development, and investment in diverse-owned companies through our [Supplier Diversity program](#).

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 by spending \$2.8 billion with diverse-owned suppliers.

For more detailed information on our specific commitments, please see our most recent [Diversity Annual Report](#).

Progress and commitments



Creating a more inclusive, resilient, transparent, and connected supply chain is a long-term process. We've set a number of goals for our own operations and those of our suppliers to help accelerate our progress.

We are working to better understand and act on the topics that are most impactful to our stakeholders, including our supply chain workers and the communities with which we interact. This work requires significant stakeholder engagement and analysis of our supply chain, which takes time and investment. We want to make sure we do this work right. That's why we are not committing to any additional goals at this time, and we plan to reassess our supply chain engagement strategy at a later date.

Here's a look at some of the commitments and progress we made last year. Each of these targets represents our ongoing, year-to-year commitment to make significant progress toward a specific priority.

Progress against targets

Putting people first

Target	2022 progress	Status
Continue to integrate our Supplier Code of Conduct expectations into all contractual agreements with our suppliers.	In 2022, we successfully incorporated Google's SCOC into our contractual agreements, so we will no longer be tracking this target moving forward.	●
Conduct assessments of our higher-risk supplier sites to identify and improve conformance with our Supplier Code of Conduct expectations. Build capabilities with our suppliers by providing training and tools to address higher-risk topics and common nonconformance issues.	In 2022, we completed 85 SCOC assessments to continue to work with our suppliers on providing fair, healthy, and safe conditions for their workers.	●
Empower the voices of the people in our supply chain using various tools to gather anonymous feedback and identify improvement opportunities; promote worker capacity building by enabling digital and direct worker training for personal and career development.	In 2022, we conducted worker surveys at 10 supplier sites. The information we gathered is helping suppliers maintain healthy working conditions and address workers' concerns. Although we covered fewer sites than in the previous year, we reached the same number of workers, enabling us to provide more comprehensive feedback to supplier management. While we prioritized identifying areas for improvement over launching new supplier training, we continue to explore opportunities to enhance worker capacity within our existing supplier initiatives.	●
Conduct a Supplier Sustainability Summit covering topics such as Google's Supplier Code of Conduct, anti-modern slavery, and human rights.	In April 2022, 789 participants attended our Supplier Sustainability Summit. During the Summit, we conducted two sessions about supplier responsibility to support our higher-risk suppliers in developing the knowledge and building the capability to mitigate the potential risks in their own operations and supply chains.	●
Scale our Process Chemicals FMD Data Collection and Assessment to additional strategic suppliers to improve safe chemistry through verifying their conformance with the MRSL requirements, using safer alternatives, and controlling chemical hazards to eliminate exposures.	In 2022, our program expanded to evaluate 156 chemical processes and extended training to more suppliers, encouraging Tier 1 suppliers to disseminate their knowledge to Tier 2 suppliers.	●
Grow our spending with diverse suppliers to \$2.5 billion, while expanding our Supplier Diversity program beyond the United States to include suppliers from historically underrepresented groups around the world.	We spent \$2.8 billion with suppliers from diverse backgrounds, exceeding our 2022 goal. In 2022, we also piloted extending our supplier diversity programs beyond the United States. For more detailed information on our specific commitments, please see our most recent Diversity Annual Report .	●

● Achieved ● In progress ● Missed

Progress against targets (continued)

Strengthening communities

Target	2022 progress	Status
Ensure that our suppliers source from smelters that are 100% conformant with the Responsible Minerals Assurance Process assessment protocols for tantalum, tin, tungsten, and gold.	For the fifth year in a row, 100% of the smelters or refiners we used were conformant, active, ¹⁰ or verified by a third party as sourced from countries other than those covered in the 2010 Dodd-Frank Act.	●
Expand the Congo Power program to focus on conservation and community health partnerships that improve alternative livelihoods and gender outcomes and that reinforce responsible supply chains of conflict minerals.	In 2022, we successfully reached our 2023 goal by concluding three Congo Power projects that had been initiated in late 2021. We also transitioned responsibility of oversight of the Congo Power program to the Public-Private Alliance for Responsible Minerals Trade, which will be in charge of managing the program going forward.	●
Implement collaboration framework with the Responsible Minerals Initiative to increase transparency and accountability between upstream and downstream partners that depend on responsible cobalt supply chains.	We have made strides in enhancing cobalt traceability within our own supply chains, but we have yet to establish a collaboration framework with RMI.	●
Complete third phase of digital traceability project and expand supplier campaign to increase smelters and downstream partners using end-to-end data monitoring tools.	Blockchain testing remains an ongoing initiative, and suppliers that participated in Phases 1 and 2 continue to successfully generate traceable QR codes. In 2022, we began Phase 3 of our blockchain traceability project to pilot tracing tin from products to smelters.	●

● Achieved ● In progress ● Missed

Protecting the planet

For a review of progress toward our environmental targets, please see our [2023 Environmental Report](#).

Endnotes

1. These figures do not include findings from third-party audits conducted through the [RBA VAP](#). However, Google also monitors the results of these third-party audits, and trends in findings are similar to those shown here for Google-managed audits.
2. For the purposes of this report, “Compliant” smelters or refiners are those that are conformant, active, or verified by a third party to source from countries other than those covered in the 2010 Dodd-Frank Act. See [Alphabet’s Conflict Minerals Policy and Report](#) for more information.
3. See note 1 above.
4. See note 1 above.
5. See note 2 above.
6. Smelters and refiners are defined as “conformant” or “active” by the Responsible Minerals Initiative. Conformant smelters or refiners are those that have been audited and meet the criteria for not directly or indirectly supporting the conflict; active smelters or refiners are those in the process of being audited.
7. [Delve \(website\)](#), accessed September 27, 2023.
8. [“Democratic Republic of the Congo,” Power Africa fact sheet, USAID](#), accessed September 27, 2023.
9. We’ve adjusted our project counting method. Previously, we counted any project with deployed resources as completed. Now, we count only fully executed projects and the people they have impacted. While this may result in smaller reported numbers compared to previous years, please note that the total number of people impacted by our projects is expected to remain consistent with past figures once all projects are completed.
10. See note 6 above.



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Additional resources

[Statements Against Modern Slavery \(2022, 2021, 2020, 2019, 2018, 2017\)](#)

[Supplier Code of Conduct](#)

[SEC filings \(2022, 2021, 2020, 2019, 2018, 2017\)](#)

[Supplier Responsibility Reports \(2022, 2021, 2020, 2019, 2018, 2017\)](#)

[Sustainability Reports](#)