



September 16, 2022

Dear BHRRC Asia :

Thank you for your correspondence. We take the human rights of workers very seriously and would like to outline our commitments on this issue and our efforts to deliver on those commitments in this letter. Part of our efforts to deliver on our commitments involves continuously engaging with stakeholders like BHRRC around our work to address potential human rights risks in our operations, supply chains, and communities. This engagement informs how our approach evolves, and we are constantly making improvements.

Google is committed to upholding the human rights of workers and treating them with dignity and respect. This commitment applies to all workers, including temporary, migrant, student, contract, direct employee, and any other type of worker. We are pleased to outline those commitments, and our continuing efforts to track and comply with our legal obligations and our own expectations on human rights obligations.

We expect our suppliers to fulfill this same commitment and have embodied this expectation in our [Supplier Code of Conduct](#). In addition, our publicly posted [Policy Against Modern Slavery](#) defines modern slavery, gives a concrete list of prohibited actions, and provides reporting channels for suspected instances of modern slavery.

We continually assess modern slavery 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 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.

Additional information about our anti-modern-slavery program can be found in our annual [Modern Slavery Act Statement](#). Additional information about our Supplier Code of Conduct program, including our supplier assessments, can be found in our most recent [Supplier Responsibility Report](#).

In addition to the programs above, we have joined other companies through the [Responsible Business Alliance](#) ("RBA") to drive ethical labor practices throughout our collective supply chains. We are also working directly with our suppliers to reinforce our Supplier Code of Conduct, which strictly prohibits forced labor and requires workers to be treated fairly with dignity and respect.

We will continue to work alongside our industry partners and our suppliers to respect human rights across our global supply chains. Thank you for giving us the opportunity to engage with you on this important issue.

Sincerely,
Human Rights Team
Google, Inc.