

Building on our Workplace Commitments

25 September 2020

Today we're committing to five guiding principles and a list of detailed changes to our workplace policies and practices.

Guiding Principles

Commitment: We will double down on our commitment to a respectful, safe, and inclusive working environment for all employees and members of our extended workforce.

Care: We will continue to create an environment that emphasizes respect for each individual at all levels of the organization.

Transparency: We will be open and transparent as an organization regarding the frequency of complaints of misconduct and our approach to investigating and responding to those allegations.

Fairness & Consistency: We will make sure that everyone is treated respectfully, fairly, and compassionately, and we'll apply our employment policies consistently.

Accountability: We will hold everyone responsible for their actions.

General

- Set up a new DEI Advisory Council to advise on and oversee the below efforts, with experts Judge Nancy Gertner (retired), Grace Speights, and Fred Alvarez joining CEO Sundar Pichai, Chief Diversity Officer Melonie Parker, SVP of Global Affairs Kent Walker, and SVP of Core Jen Fitzpatrick
- Update Alphabet's and Google's codes of conduct to include the new Guiding Principles

Policies

- Annually review Google's and Other Bets' sexual harassment and retaliation policies and practices to ensure they are consistent with guiding principles
- Make arbitration optional for all employees, temporary staff, vendors, and independent contractors for individual harassment, discrimination, and retaliation disputes with Alphabet
- Address manager obligations, off-site conduct, conduct during hiring, and resources for Googlers via our anti-discrimination, harassment, and retaliation policy
- Clarify personal relationship reporting obligations, and prohibit—instead of just strongly discourage—relationships (romantic, physical, familial) in reporting lines and in which a Googler exercises authority over another Googler or extended workforce member, via personal relationships at work policy
- Clarify how we expect our suppliers to conduct investigations, encourage reporting of concerns, and prohibit retaliation via the Supplier Code of Conduct and continue to audit suppliers to support compliance
- Continue to discourage excessive alcohol consumption via drugs and alcohol policy

Investigations

- Assign a specialist team to cases involving senior leaders and report case results to the Board's Audit Committee
- Continue to enhance investigations processes, including how we escalate concerns, how quickly we respond, how we reopen cases, and more
- Offer four follow-up meetings over two years to complainants involved in harassment, discrimination, or retaliation investigations following an investigation
- Continue to enhance investigations processes for cases involving extended workforce members, including how quickly we respond, how we reopen cases, and more
- Continue to analyze investigations data to ensure that lessons learned are captured and relied upon to further improve our policies, training and investigation outcomes
- Provide Googlers with information about how sexual harassment and other allegations are investigated through the annual Internal Investigations Report and Investigations Practice Guide

- Continue to allow Googlers who settle claims of sexual harassment and related retaliation to disclose the facts and circumstances underlying such claims
- Remind Google suppliers of the prohibition on retaliation when an extended workforce member raises concerns to Google
- Offer report templates as best practices for Google's suppliers to use in their investigations
- Enhance case management tools to better track and support Googler interactions with Human Resources and investigations teams and guard against potential retaliatory actions
- Continue to annually assess resource needs of Google's investigations teams

Awareness and Training

- Emphasize that senior leaders and managers are held to a higher standard and that they're responsible for fostering an environment where people are comfortable raising concerns and where misconduct is not permitted
- Enhance training for managers with respect to helping Googlers: understand retaliation, report sexual harassment, interact with prospective employees, understand alcohol usage policies, etc.
- Enhance training and awareness for all employees with respect to helping them: understand retaliation, limit unconscious bias, and understand alcohol usage policies
- Continue to require employees to take sexual harassment and retaliation training
- Enhance existing training for investigators and Human Resource personnel, in areas like handling off-site concerns, engaging with empathy, responding to new information and appeal requests
- Continue to promote ways employees can raise concerns
- Update Noogler orientation to highlight ways employees can raise concerns
- Continue to spotlight sexual harassment concerns in the annual Internal Investigations Report
- Enhance extended workforce orientation materials to increase awareness on how to raise concerns and our policy prohibiting retaliation
- · Annually review sexual harassment and retaliation training materials

Disciplines and Incentives

- Build on our current practice of prohibiting severance for anyone terminated for any form of misconduct and expand the prohibition to anyone who is the subject of a pending investigation for sexual misconduct or retaliation
- Codify consideration of sexual harassment, sexual misconduct and retaliation in severance decisions
- Provide managers with guidance instructing them on how misconduct should impact an employee's performance evaluation, compensation decisions, and promotion outcomes
- Continue to communicate that sexual harassment training noncompliance will impact performance and pay decisions
- Require employees to certify that they know misconduct can impact compensation and can result in termination
- · Provide examples to employees of how misconduct can impact compensation
- · Clarify and expand use of coaching as a disciplinary action
- Provide training or coaching to employees who receive final written warnings
- Include demonstration of Google values in compensation programs
- Create an Employee Disciplinary Committee to review disciplinary recommendations for cases involving senior leaders and certain kinds of misconduct
- Create a Corrective Action Committee to make final determinations for disciplinary actions in certain cases where the business disagrees with the corrective action recommended by the investigative team and the Employee Disciplinary Committee
- Report to the Corrective Action Committee aggregated cases in which the investigative team and the business did not agree

Diversity, Equity and Inclusion

- Ensure that \$310 million in funding goes toward DEI initiatives and programs
 focused on increasing access to computer science education and careers;
 continuing to build a more representative workforce; fostering a respectful,
 equitable and inclusive workplace culture; and helping businesses from
 underrepresented groups to succeed in the digital economy and tech industry
- Formalize Chief Diversity Officer's quarterly report to the Board's Leadership,
 Development, and Compensation Committee on culture and DEI issues
- Continue to provide organizational diversity data to directors and VPs
- Continue to include underrepresented talent in calibration meetings with hiring managers
- Maintain practice of not considering prior salaries in negotiating starting salaries
- Maintain work to engage Board candidates from underrepresented groups

Governance

- Amend the charter of the Board's Leadership, Development, and Compensation Committee (LDCC) to make explicit its mandate to oversee our efforts to promote a respectful workplace free from employment discrimination, harassment and retaliation
 - Provide investigations data on sexual harassment, discrimination, and retaliation to the LDCC
 - Present to the LDCC on sexual harassment and retaliation training content for employees at individual, manager, and executive levels
 - Have the LDCC report to the Board on workplace issues, including compensation decisions for senior executives found to have engaged in sexual harassment, sexual misconduct, or retaliation
- Rename the Board's Audit Committee to the Audit and Compliance Committee and update its charter accordingly
 - Establish Audit and Compliance Committee mid-quarterly meetings on legal and regulatory compliance matters
 - Continue to provide quarterly report to Audit and Compliance Committee on compliance efforts and investigations
 - Continue to provide a formal reporting mechanism from heads of compliance / investigations to Audit and Compliance Committee
 - Establish an Audit and Compliance Committee quarterly report to the Board on legal and regulatory compliance issues
 - Update incident management process with hypothetical scenarios on when to escalate to Audit and Compliance Committee

Governance

- Report annually to Board on effectiveness of Google's and Bets' sexual harassment and retaliation compliance programs and proposed changes
- Track compliance with employees' sexual harassment and retaliation training requirements and report deficiencies to the Board
- Mandate sexual harassment and fiduciary duty training for the Board
- $\bullet\,$ Continue to review Board committee memberships and chairs on a regular basis