

Report On Google Civil Rights Audit

March 3, 2023

WILMERHALE® ®

I. Introduction

In September 2021, Alphabet retained Wilmer Cutler Pickering Hale and Dorr LLP (“WilmerHale”) to conduct a voluntary civil rights audit of Google (“the Company”) policies, practices, and products.¹ The audit focused on three key areas:

People – how Google seeks to foster a diverse, equitable, and inclusive workplace for employees and members of its extended workforce;

Markets – how key Google products and services seek to safeguard civil rights, including through content moderation practices, advertising platforms and services, the use of artificial intelligence (“AI”), and product inclusion; and

Society – how Google seeks to support civil rights principles through economic opportunity programs, supplier partnerships, and philanthropic efforts.

The audit was led by Debo P. Adegbile, Chair of WilmerHale’s Anti-Discrimination practice and an experienced civil rights lawyer, and Michelle Nicole Diamond, a partner in the Anti-Discrimination practice with substantial experience conducting civil rights audits. Prior to joining WilmerHale, Debo had significant experience in the government and non-profit sectors, including senior roles at the NAACP Legal Defense and Educational Fund and the U.S. Senate Judiciary Committee. Appointed by President Obama in 2016, Debo also served as a commissioner on the U.S. Commission on Civil Rights until completion of his term in 2022. WilmerHale assembled a diverse team of attorneys with experience working on civil rights and diversity, equity, and inclusion (“DEI”) issues. We worked closely with Google’s Head of Civil Rights and in-house attorneys who represent Google and Alphabet. Our review also benefited substantially from engagement and regular dialogue with Google’s Chief Diversity Officer and other senior leaders.

The audit has identified significant strengths as well as opportunities for Google to further advance civil rights, equity, and inclusion. WilmerHale made a series of recommendations about ways in which Google could strengthen its efforts in the review areas, examples of which are detailed below.²

¹ Alphabet is the parent company of Google and several other companies.

² WilmerHale’s assessment and recommendations considered applicable laws and regulations, including relevant anti-discrimination laws. We also advised Google on how to enhance its existing civil rights program such that it is designed to safeguard civil rights across the Company and address evolving civil rights issues over the long term, consistent with the Alphabet’s new guiding principles on civil rights, described in Section II.

This report describes our methodology as well as a number of key, non-privileged observations and recommendations. In this report, we omit proprietary, confidential, and privileged information.

II. Scope and Methodology

The audit was broad and deep. We defined civil rights as the rights of all people to participate equally in society, economy, culture, and politics, regardless of race, ethnicity, sex, sexual orientation, disability, or another protected characteristic.³ Rather than limit its audit to workplace issues, Google specifically asked us to assess critical product areas and practices—including content moderation across YouTube, Search, Google Play, and ads; ad platforms and services; product inclusion; and the governance of AI technologies—as well as Google’s broader impact on society through economic opportunity programs, supplier partnerships, and philanthropic efforts. We conducted over 200 interviews with Google employees (“Googlers”) from different teams, functions, and levels of seniority, including representatives from employee resource groups (“ERGs”). We also reviewed extensive written materials, including internal policies, procedures, reports, and guidance documents.

We assessed Google’s practices and products with respect to the core components of a civil rights program: (1) risk identification and analysis processes; (2) policies and procedures addressing conduct that is unlawful or may undermine civil rights; (3) confidential reporting and investigation processes for addressing civil rights complaints from internal and external stakeholders; (4) remediation processes for addressing and preventing identified civil rights risks; (5) training and education on bias, inclusion, and civil rights principles; and (6) civil rights governance, expertise, and oversight.

Although legal compliance was a core focus of the audit, Alphabet did not limit our charge to those questions; rather, it sought to use the audit to support its efforts to build a sustainable and enduring civil rights program. In a demonstration of its commitment to civil rights, including ensuring that new policies, practices, and products incorporate such considerations, Alphabet has developed a series of principles to guide its approach to civil rights now and in the future:

Respect: Alphabet fosters an environment that recognizes the right of our people, users, and stakeholders to be free from discrimination, harassment, and prejudice, including through our products, practices, or platforms. We are at our best when everyone feels seen, heard, recognized, and valued for who they are and has a sense of belonging.

³ This definition is based on U.S. anti-discrimination statutes, regulatory guidance, and academic literature, among other sources. In developing the list of protected characteristics, we consulted guidance from the U.S. Department of Justice and the Equal Employment Opportunity Commission.

Equity: Alphabet advances fairness, accessibility, and opportunity for all individuals regardless of any social or cultural factors. Our ability to harness our creativity and create true innovation can only come from a culture that invests in people and removes obstacles to growth and progression.

Transparency: Alphabet and our products do our part to guard civil rights, foster equity and inclusion, and address risks of bias, hate, and misinformation. We recognize the importance of sharing information on our efforts to build trust and promote accountability.

Accountability: Alphabet holds itself and its people to high ethical standards. We know that our people and our partners expect this of us, and that's a good thing because we grow and evolve on the basis of their feedback.

These concepts were in mind during the audit process and the recommended enhancements described below are entirely consistent with these principles.

Although the audit focused primarily on Google's activities in the United States, we considered certain global practices and international activities. Specifically, we conducted a limited review of workplace DEI initiatives in each region where Google operates: Asia-Pacific ("APAC"), Europe, Middle East, and Africa ("EMEA"), and Latin America ("LatAm"). We also reviewed practices for enforcing content moderation policies internationally, including training, coverage, and capabilities in non-English languages and markets, and, in some cases, considered additional applicable legal frameworks.

WilmerHale drew on its civil rights expertise and experience advising companies on civil rights and DEI issues, including deep knowledge of anti-discrimination laws and laws governing corporate efforts to advance equity and opportunity beyond what is legally required. Where appropriate, we considered global practices, legal frameworks, and international activities. We benchmarked several topics related to DEI in the workplace, AI, content moderation, and advertising. We considered academic and social science literature as well as materials from government entities, civil rights organizations, think tanks, policy centers, and peer companies.

Finally, we received valuable feedback from over a dozen civil rights organizations and external stakeholders, several of which we met with multiple times, both in group and individual settings. These meetings built on the Company's ongoing engagement with leading civil rights groups and stakeholders, which predated our review. The civil rights groups shared their constituencies' top priorities and offered suggestions on how Google could better advance civil rights, equity, and opportunity. We are grateful for their input.

III. Observations and Recommendations

Google undertook this audit voluntarily. Prior to commencing this review and continuing during the course of it, Alphabet and Google made a series of investments related to civil rights. For example, Google previously established two company-wide positions dedicated to civil and human rights, a Head of Civil Rights and a Head of Human Rights; launched the Human Rights Executive Council to provide oversight and guidance on U.S. civil rights and global human rights issues; provided for oversight of civil and human rights work by the Audit and Compliance Committee of Alphabet’s Board of Directors; and incorporated civil rights considerations into many aspects of its business, often informed by its ongoing dialogue with civil rights organizations.

The scale, diversity, and complexity of Google’s businesses and products make its reach with respect to civil rights and economic opportunity significant. Responding effectively to civil rights considerations requires an iterative, multifaceted approach including effective governance structures, policies, and expertise. For this reason, one of the most important opportunities we identified relates to Google’s civil rights infrastructure. Building on the existing in-house expertise of the Head of Civil Rights, Head of Human Rights, Chief Diversity Officer, and their teams, we recommend a civil rights infrastructure that can review and provide expertise on policies, processes, and product changes across the business—including in critical areas like AI, content moderation, and ads. In collaboration with the Head of Civil Rights, the program should advise internal stakeholders on civil rights risks and impacts, design data-driven risk assessment processes and initiatives to address those risks, develop relevant policies and procedures, ensure that accountability mechanisms are in place with systems for reporting compliance concerns, and provide updates to the Alphabet Board.

A. People

We evaluated Google’s efforts to foster a diverse, equitable, and inclusive workplace across the employee lifecycle. We examined how Google attracts talent; recruits, hires, and levels candidates; trains and develops talent; compensates, evaluates, and promotes Googlers; strives to retain Googlers; implements DEI initiatives; and investigates and resolves complaints. For each topic, we analyzed relevant policies, procedures, and accountability mechanisms.

Our assessment benefitted from numerous conversations with Google’s Chief Diversity Officer and members of her team, who are deeply engaged in this work. We interviewed internal stakeholders in functions such as recruiting, retention, DEI strategy and initiatives, performance management, pay equity, and investigations as well as members of Google’s ERGs. Beyond the United States, we also spoke with internal stakeholders in APAC, EMEA, and LatAm.

Our review was also informed by Google’s [Workplace Commitments](#). In 2018 and 2020, Google announced an extensive set of changes to its workplace policies and practices, focused on sexual harassment and retaliation. We reviewed those commitments and learned from internal stakeholders that many had already been expanded to address discrimination more broadly. We also met on multiple occasions with Google’s DEI Advisory Council, which oversees the implementation and ongoing operation of Google’s Workplace Commitments and includes standing members independent of the Company who have expertise in this area.

Observations

Google has invested considerable thought and resources to advance diversity, equity, and inclusion at each stage of the employee lifecycle—and it has continued to do so throughout our audit. As described below, Google has recently made changes to its performance evaluation process and manager training program. In some instances, Google has iterated on and made changes in response to conversations with the WilmerHale team. Many of our recommendations build on existing work.

In response to the murder of George Floyd and the push for greater equity that followed, Google launched the [Racial Equity Commitments](#), which aim to build sustainable equity for Black Googlers and to make its “products and programs helpful in the moments that matter most to Black users.” Google committed to increase representation of underrepresented groups across the Company and in leadership by enhancing efforts related to hiring, retention, and promotion. Among other goals, the Racial Equity Commitments aim to create a stronger sense of inclusion and belonging for all Googlers. As it continues to make progress on the Racial Equity Commitments and expand their multicultural scope, Google should continue its work to embed the Racial Equity Commitments into its standard processes. As Google itself has recognized, incorporating DEI considerations into its day-to-day operations is critical to accomplishing DEI goals.

Hiring and Recruiting. In 2021, Google embedded DEI expertise within the recruiting function by creating dedicated teams focused on cultivating, recruiting, and hiring a broad range of talent. The function is charged with designing and deploying equitable hiring strategies, developing a diverse talent pipeline, and building partnerships with educational institutions serving historically underrepresented communities, such as Historically Black Colleges and Universities (“HBCUs”) and Hispanic Serving Institutions (“HSIs”). Google could enhance its education programs, which foster pathways to tech for historically underrepresented communities, by deepening partnerships with HBCU and HSI partner organizations and by ensuring candidates from other historically excluded communities, such as Tribal Colleges and Universities, are included.

Google has also developed a set of best practices for inclusive hiring. These best practices, however, are recommended rather than mandatory, which can result in uneven utilization across

the Company. Regular training on the inclusive hiring best practices for individuals involved in hiring decisions (including recruiters, sourcers, and hiring managers) and ensuring leaders are accountable for following those practices would represent meaningful steps in reinforcing Google's priority of equitable hiring.

As part of the onboarding process for new hires, New Googler ("Noogler") Orientation includes sessions describing the various ERGs employees can join, DEI programming and initiatives, and the importance of considering equity and inclusion in the product development process. In 2022, Google began offering an optional Black Noogler onboarding program that we understand has been received favorably by participants. We recommend Google offer tailored onboarding programs—or similar support structures—to Nooglers from other underrepresented groups to further promote a sense of belonging early in Googlers' tenure. We understand expanded offerings are underway.

Retention and Inclusion. Retention of underrepresented Googlers is also a key priority for the Company. In 2018, Google launched the Stay and Thrive team, which focuses on retaining underrepresented employees at risk of departure. This team provides individualized consultations and resources to employees at risk of attrition, particularly when the employee identifies lack of inclusion as a reason for their potential departure. The Stay and Thrive team also engages in targeted interventions and analyzes retention data to identify emerging trends. In addition, Google has developed DEI programming and resources to enhance belonging among underrepresented groups with higher rates of attrition. According to the 2022 Diversity Annual Report, Google has improved retention for women globally and for Black and Latino employees in the United States over the past year. The attrition rate for Native Googlers, however, increased in 2021, and the Company still has progress to make with respect to the representation of Black, Latino, and Native employees, especially in leadership. We offer several recommendations for a multi-faceted approach to enhancing Google's ongoing representation efforts.

One of the largest areas of opportunity is improving managers' ability to lead a diverse workforce. Managers can significantly impact the day-to-day experiences of employees, including those from underrepresented groups. Google recently revised its manager training and performance review processes to emphasize expectations that managers foster inclusive teams and develop all talent. The Company also developed additional resources—including one-on-one coaching sessions—to help managers build skills necessary to manage across differences. Critically, Google has also taken steps to hold managers accountable for fostering equitable and inclusive environments through revisions to the performance review process. The new review process, known as Googler Reviews And Development (GRAD), sets expectations for employees, provides guidance on promotion readiness, and establishes accountability structures. Google should continue to prioritize efforts to equip managers with the skills they

need to lead a diverse workforce and hold them accountable for fostering environments where all Googlers can thrive.

Google could expand its efforts to understand the experiences of underrepresented Googlers—and support them—by recognizing and analyzing disaggregated employee data. For example, Google currently analyzes and reports representation data for the “Asian” community, which can mask the varying experiences of the diverse and distinct Asian American and Pacific Islander (“AAPI”) communities. Disaggregating Googler self-ID data would similarly benefit the communities of people with disabilities and non-binary genders. This data should inform how Google sets DEI-related goals and initiatives as well as how Google evaluates the employee experience.

Finally, Google should further its efforts to identify product areas and teams that would benefit from additional guidance and support. Google leverages in-house experts in equity and data analytics to assess and develop interventions aimed at addressing potential disparities, consistent with the law. Some interventions are targeted and others involve process improvements. Google should continue to assess representation data across the Company, including by conducting targeted assessments of teams that play a key role in addressing civil rights. Based on the results of those assessments, Google should consider ways to enhance recruiting methods and/or training for these teams. We also recommend that the Company continue to analyze employee lifecycle data—including performance, promotion, compensation, and leveling outcomes—at an aggregated level. Google could bolster that work by analyzing more granular data, including for additional underrepresented groups, as appropriate, and across new talent management processes, such as GRAD. We also recommend Google expand the ways in which People team members with DEI expertise support individual product areas. In addition to providing advice and consultation, they could tailor and effectuate DEI initiatives for product areas and share successful initiatives and lessons learned across product areas. More broadly, we recommend Google identify more effective ways to communicate with Googlers about the good work that is undertaken and increase transparency regarding its efforts.

B. Markets

As noted above, the audit went beyond Google’s workplace. We also assessed the impact of certain Google products and practices on civil rights, equity, and inclusion. Informed by dialogue with civil rights groups, as well as industry analysis and regulatory considerations, we focused on core practices and products related to content moderation, ads platforms and services, and AI, which we describe in turn below.

We also looked more broadly at Google’s product inclusion initiatives, which Google defines as the practice of applying an inclusive lens to product development and design processes. Given the vast reach of its products and their impact on society, Google seeks to incorporate equity and

inclusion principles into product design. For example, in 2014, Google began working to expand equity and inclusion through imaging. The Company partnered with historically marginalized Googlers and professional image makers to make photo algorithms more accurately capture people of color in photos. It launched face detection and editing products called Real Tone to improve image brightness, depth, and detail across all skin tones. And in 2021, Google launched the Pixel 6 phone equipped with a camera and software that more accurately capture a range of complexions.

In 2022, Google combined its existing Product Inclusion & Equity workstream with its Accessibility workstream to create a central Product Inclusion, Equity and Accessibility team, which is dedicated to creating products that reflect all users. The team has established infrastructure, created resources such as tooling and product inclusion checklists, and developed Google-wide and product-area specific objectives and metrics. As Google works toward integrating product inclusion throughout the product development process, it should leverage its product inclusion infrastructure and provide tailored product inclusion expertise across the Company to advance the impact of its commitment in these areas.

1. Content Moderation

Content moderation is a vast and complex topic. Product areas at Google must necessarily tailor their policies and enforcement practices to the relevant products. We did not evaluate the practices of every product area; rather, we focused on platforms with greater potential to affect the civil rights of users—YouTube (Google’s main platform for user-generated content) and Google’s ad platforms and services (which sometimes rely upon information inferred about or provided by users).⁴ We also reviewed certain content moderation practices related to Google Search and Google Play.

We focused on policies and practices related to hate speech and harassment on YouTube, dangerous and derogatory content on Google’s ads platforms and services, and the potential for misinformation on both platforms—including political and election-related misinformation. We conducted an end-to-end review of the policies and practices governing YouTube’s content moderation process, including policy development; machine learning detection tools; the role of human review; enforcement actions and content removal; and appeals practices. We also discussed algorithmic ranking and filtering, as well as programs and tools for promoting safety on the YouTube platform. Similarly, for ads, we focused on policies and practices governing content-related policy development, implementation, and enforcement mechanisms. For Google Search and Google Play, we explored the policy development and enforcement processes.

⁴ Google acquired YouTube in 2006; YouTube is now part of the Company.

As part of our review, we spoke with key internal stakeholders, including those involved in policy development, policy enforcement, product design and development, and engineering.

Observations

Moderating content on online platforms in ways that minimize societal harm is both important and challenging. Google should—and does—dedicate substantial resources and attention to fairly and equitably moderating content on its platforms, and it has established infrastructures to enforce prohibitions on hate speech, harassment, and certain types of misinformation. The scope, dynamism, and context of content moderation on these platforms adds layers of complexity and nuance that require vigilance. This is, in part, because the types of speech that fall within these policies evolve across cultures and geography. We begin with observations about relevant policies, which set the foundation for what is permissible on Google’s platforms, and then turn to enforcement practices.

Policy Prohibitions. Google has several content-focused policies that aim to address potential civil rights impacts. For example, YouTube’s hate speech policy prohibits content promoting violence or hatred against individuals or groups based on attributes such as race, nationality, sex, gender, sexual orientation, religion, caste, disability, immigration status, and veteran status, among other attributes. YouTube also has harassment and cyberbullying policies, which prohibit targeting individuals with prolonged or malicious insults or slurs based on intrinsic attributes, including protected group status and physical traits.

Relevant to its ad platforms, Google policies prohibit harmful content in ads and on the properties of publishers that are part of its ads network. For instance, the Dangerous and Derogatory Content policy prohibits content that incites hatred against, promotes discrimination of, or disparages an individual or group based on protected class status or any other characteristic that is associated with systemic discrimination or marginalization. The Dangerous and Derogatory Content policy also prohibits content that harasses, intimidates, bullies, or seeks to exploit others. This policy covers not only the most explicit examples of discriminatory or hateful speech but also speech that relies on stereotyping or other harmful assumptions about groups of people.

Although Google has developed policies to address hate and harassment that are strong and well-considered, there are opportunities for improvement. For example, unless violative content is covered within its existing hate speech, harassment, and cyberbullying policies, YouTube’s policies do not on their face prohibit intentional misgendering or deadnaming of individuals. Both acts have the potential to create an unsafe environment for users and real-world harm. We recommend Google review its policies to ensure it is appropriately addressing issues such as the intentional misgendering or deadnaming of individuals and continue to regularly review its hate and harassment policies to adapt to changing norms regarding protected groups.

Policy Development. Several Google product areas take steps to incorporate equity considerations into their policy development process. For instance, Google has instituted policy equity assessments during the development of certain content-based Search, Google Play, and ads policies. New YouTube policies and substantive policy changes undergo a multi-stage, cross-functional review process. As of 2022, this process includes input from ERG delegates to ensure that underrepresented voices are included in the policy approval process. ERG members offer valuable perspectives, but employees join ERGs for many reasons, including the opportunity to develop a sense of community with others. ERG members typically volunteer their time beyond what is required by their jobs, which may or may not include backgrounds in DEI issues or policy and product development.

We recommend the Company enhance its content moderation policy approval processes in two ways: First, we recommend expanding equity assessments for relevant policies across product areas. Second, the content moderation policy approval processes would benefit from formal input from in-house civil rights and equity experts—in addition to those ERG delegates who volunteer to share their perspectives—where such consultation is not already part of the process. Engaging in-house expertise will fortify product areas’ ability to identify equity or civil rights-related risks and decrease the reliance on ERG members to inform policy and product decisions, some of whom welcome the invitation, and others who would prefer to not bear this responsibility. Formalizing the structure around its existing engagement with external experts could strengthen equity assessments by helping Google identify new developments and potential risks that may impact civil rights.

In addition to policies prohibiting hate speech and other forms of harassment, YouTube convenes a cross-functional working group with the goal of reducing hate, harassment, and other forms of harm to creators on the platform. YouTube has made efforts to expand this working group, including with full-time employees focused on making the platform safe and equitable. In 2021, in consultation with civil and human rights experts, YouTube created a mechanism for creators in the United States to voluntarily share information about their gender identity, race and ethnicity, and sexual orientation with YouTube. The initiative seeks to evaluate how YouTube’s products and policies are working for creators and artist communities of different races, ethnicities, gender identities, and sexual orientations, in order for YouTube to better examine how its systems treat content from various communities and identify potential patterns of abuse. The Company should continue to analyze creator data to inform improvements to the platform and, more broadly, assess potential equity and inclusion-related risks in its content moderation processes.

Likewise, there is recognition among relevant ads teams that it is important to pursue equity-focused policy initiatives beyond what is required or prohibited by law to create positive social impacts. For example, Google updated its policies to ban ads promoting certain skin lightening products and cash bail loans. Google could expand on these positive initiatives by

further embedding equity and inclusion considerations throughout the policy (and product) development processes, to ensure these are considered from initial idea to implementation.

Enforcement. Content moderation policies are nuanced, and enforcement mechanisms must be iterative, nimble, and scalable. Google has invested significantly in enforcement: YouTube reported that it spent nearly \$1.2 billion on content moderation efforts in 2020, the most recent year for which data is available. While enforcement practices necessarily differ between product areas, teams generally rely on a combination of machine learning and human review to enforce their content policies. At YouTube, for example, content is flagged by machine learning as potentially violative of the hate speech policy and then routed to human reviewers. Reviewers receive extensive training to promote consistent, accurate enforcement. YouTube contract reviewers undergo mandatory unconscious bias and LGBTQ cultural sensitivity training, and many of YouTube’s vendors provide market-specific training (e.g., training that identifies negative stereotypes or slurs from different markets). The Company should set the expectation that *all* vendors provide training to contract reviewers relevant to the countries for which they are reviewing content and require that full-time employees involved in enforcement receive implicit bias and market-specific context training tailored to their roles.

On its ads platforms, Google takes action against ads that violate relevant policies (such as the Dangerous and Derogatory Content policy) and retains discretion to take account-level actions, including suspensions, against advertisers. There are opportunities to enhance Google’s ads enforcement infrastructure, including by exploring ways to increase the efficiency and speed with which it enforces nuanced policies, like the Unreliable Claims policy, that necessitate human review. Moreover, as it continues to identify ways to ensure that repeat bad actors are identified on, removed from, and kept off its platforms, Google should also consider whether violations of the Dangerous and Derogatory Content policy and Unreliable Claims policy could be included in the set of “egregious” policies, violations of which result in account-level suspensions. Another way to further these efforts would be to develop additional mechanisms to prevent advertisers suspended for policy violations from accessing Google platforms by creating new accounts.

Misinformation. Google recognizes that misinformation can pose serious risk of real-world harm, including to communities of color, and Google’s policies seek to strike a balance between prohibiting harmful misinformation and allowing for robust public discourse. For example, “[c]ertain types of misleading or deceptive content with serious risk of egregious harm” are not allowed on YouTube, and the Community Guidelines include specific policies prohibiting election misinformation, COVID-19 medical misinformation, and vaccine misinformation. YouTube’s election-specific policies target verifiably false claims and misinformation about certain electoral outcomes. Similarly, for ads, the Unreliable Claims policy prohibits “making claims that are demonstrably false and could significantly undermine participation or trust in an

electoral or democratic process,” including information about voting procedures and candidate eligibility.

As described above, YouTube relies on both trained human content reviewers and multiple machine learning systems to enforce its policies, including policies against misinformation in multiple languages. In 2022, a majority of the content removed from YouTube was created by users outside the United States, and in nine of the top 10 countries where videos were removed, English is not the primary language. Addressing misinformation requires training and knowledge-building in non-English languages and markets, which are critical priorities for Google. Regularly assessing human and automated language expertise and capabilities, as Google does from time to time, would help the Company more swiftly and accurately enforce policies for content in all languages. Indeed, the Company is actively working to incorporate AI into its abuse detection and policy enforcement operations to achieve scale and effectiveness with respect to language capabilities. This is particularly important for safeguarding civil rights, as non-English markets (including communities in the United States who speak other languages) are often targets for misinformation. Extensive non-English language expertise is critical to understanding the local context and nuance of certain content and to equitable enforcement.

In addition to taking enforcement action against policy-violating misinformation, YouTube relies on various mechanisms to raise authoritative content and reduce the spread of content identified as low quality or borderline, including certain types of misinformation. Such content is not widely recommended to users on YouTube, but YouTube does not label such content. For certain topics, YouTube automatically includes information panels that point to authoritative sources for information on the relevant topic. We recommend that Google platforms continue to explore additional ways to reduce the spread of harmful misinformation and disinformation as those challenges evolve.

With respect to ads, Google develops reviewer guidance related to its Unreliable Claims policy in English. Although the Company subsequently leverages native language speakers to build local language examples into the training, it sometimes relies on direct translation of the English-language guidance to other languages rather than including native speakers in the development process. We recommend that, for markets with heightened election misinformation concerns, Google ensure that employees with language fluency are involved when the enforcement guidance is developed for unreliable claims related to politics, social issues, or matters of public concern (in order to guard against translation-related errors) and expand that model to cover all Unreliable Claims policy enforcement.

2. Ads

Separate from the content moderation practices referenced above, we also sought to assess Google’s ad platforms and services as products from a civil rights perspective because

information about users informs how the Company serves advertisements. We assessed Google’s data collection and data privacy practices related to information provided by or inferred about users—including relevant user controls; personalized ads targeting policies and processes, restrictions, controls, and emerging challenges—and the development of privacy-focused replacements for the use of third-party cookies to serve ads.

We interviewed individuals from a variety of teams and with various expertise, including those who focus on privacy and user trust, ads policy development, implementation, and enforcement, and election ads.

Observations

As Google itself has recognized, without safeguards, platforms and tools used to buy, sell, manage, and distribute digital ads could be used to target users based on protected or sensitive personal characteristics or to disseminate discriminatory or hateful content.

Ads Generally. Preventing user harm, like improper targeting practices or the distribution of hateful or derogatory ad content, is a top priority within ads teams at Google. The Company has taken steps to prevent user harm and to advance equity, regardless of whether it is required by law. Google has always prohibited using information about users’ race, ethnicity, religion, or national origin for the purpose of serving ads, and it has consistently taken steps to empower users by giving them control over their personal information. Moreover, the Company is exploring potential changes to user data and privacy practices relevant to its ads products and services—as well as Search—via its [Privacy Sandbox initiative](#). To maintain its position as a leader in privacy-focused and user-empowering advertising practices, Google should continue to prioritize equity-advancing initiatives and projects and ensure that such changes are effectuated even when there are competing demands. For example, Google should continue to assess the equity impact of ads policies before they are launched. To incentivize this important work, Google should also recognize equity-related product and policy efforts during the performance review process, including for ads personnel.

Personalized Ads. Google considers ads to be personalized when their selection is influenced or determined by previously collected or historical data, including a user’s previous search queries, activity, visits to sites or apps, demographic information, or location. When first building its ads platforms, Google recognized the importance of limiting the types of user-related information that may be relied upon to serve ads. The Company has never permitted advertisers to target users based on their race, ethnicity, national origin, or religion, and it has built upon that long-standing prohibition as its platforms and the larger ads ecosystem have evolved. For example, in 2020, Google updated its Personalized Ads policy to prohibit advertisers promoting employment, housing, or credit ads from targeting or excluding ads based on gender, age, parental status, marital status, or zip code. For ads that may consider gender for targeting

purposes, Google should prioritize implementation of inclusive gender identity options for users and ensure targeting features respect those declarations. Having such options should promote relevance and consistency in user ad experiences across genders.

Google recognizes that allowing advertisers to target users based on certain “sensitive interests” could negatively impact user experience. Therefore, the Company restricts targeting features for ads that relate to certain “sensitive interests” about users, including identity and belief, sexual interests, among others, and similarly restricts targeting capabilities for advertisers promoting products and services that relate to those categories (e.g., religious apparel). To ensure that these categories remain thoughtful and well-informed, Google should, as appropriate, consider external perspectives when determining whether subjects fall within these sensitive interest categories.

Election Ads. Google has implemented several important protections around election ads. For example, Google requires that election advertisers undergo a thorough verification process, which Google uses to confirm identities, disallow access from unlawful advertisers, and prevent foreign interference. Google uses the information provided in the verification process to generate a “paid for by” disclosure that identifies who paid for the ad. Google allows advertisers to use only general geographical location, age, and gender for non-contextual targeting, which is analogous to how political ads are placed on TV and radio. In addition, Google’s Unreliable Claims policy prohibits ads (election-related or otherwise) from “making claims that are demonstrably false and could significantly undermine participation or trust in an electoral or democratic process.” Candidates for office and political campaigns are not exempt from this policy. Google also maintains a [Political Ads Transparency Report](#), which provides a publicly available, searchable, and downloadable repository of all ads published by verified election advertisers on Google’s platforms, and is an important way that Google supports election integrity.

While Google has made meaningful progress in addressing issues around election ads, there are areas where Google can build on this work. For example, Google tracks the total number of ads taken down in violation of the Unreliable Claims policy as well as other policies related to elections and civil rights. The Company should consider developing additional metrics to track the speed and efficiency with which it removes those ads containing election-related misinformation. Google could increase the overall integrity of election-related content by expanding penalties for repeat offenders of the Unreliable Claims policy on claims related to politics, social issues, or matters of public concern. For instance, Google could permanently suspend such offenders from Google’s ads platforms.

3. Artificial Intelligence

As Google leadership has underscored, AI presents enormous potential benefits and considerable risks, both in general and for historically marginalized communities. The design and development of AI systems can advance fairness and equity or deepen existing inequalities. We reviewed the policies, practices, and procedures relating to Google’s product development and deployment of AI technologies, including Google’s AI Principles; AI governance structure, including the responsibilities, resourcing, and training of the teams that operationalize the AI Principles; processes for assessing and mitigating AI risks; training on the AI Principles; efforts to develop and scale qualitative and technical risk assessment and remediation measures; and responsible AI research policies and practices.

Observations

In June 2018, Google launched a series of values known as the “[AI Principles](#)” to guide its development and deployment of AI systems. One of those Principles is “Avoid creating or reinforcing unfair bias.” This Principle most closely embeds traditional civil rights considerations. Civil rights values are reflected in other AI Principles, as well.

The Principles serve as important guideposts and underscore Google’s recognition of the need for a well-considered assessment, governance and compliance structure. As Google continues to focus on the development of responsible AI, it has acknowledged opportunities to scale the system of enterprise risk management (including policies, processes, guidance, and technical infrastructure) across the Company, which will strengthen the culture of responsible AI development and compliance. Looking forward, we recommend that Google continue its focus on building a mature, sustainable governance framework for identifying, analyzing, and remediating civil rights issues arising from all AI products across the product areas. In particular, the central teams tasked with designing review and assessment processes and supervising adherence to the AI Principles should be positioned to scale their work across the Company.

In the long term, due to the breadth of Google’s AI products and the context-dependent nature of AI Principles questions, the central teams charged with ensuring compliance with the AI Principles and any AI regulations and directives should bring to bear deep product-area knowledge. Familiarity with and an understanding of Google’s myriad products, as well as strong working relationships with product and engineering teams on the ground, is critical to designing processes to identify and mitigate potential civil rights risks, providing tailored guidance and resources, ensuring centralized oversight, and promoting accountability. Product area partners, in turn, should be trained and equipped to identify potential AI Principles risks, escalate novel or complex issues to the central team, and implement mitigations on a technical level. Close partnership between central and product-area teams will enable Google to build

consideration of civil rights principles into the product design, launch, and modification processes. This multi-layered approach will allow Google to provide effective oversight of AI products at scale. Ensuring that Google’s AI Principles and compliance governance enhancements reach across the Company’s AI is integral to its goal of industry leadership on AI oversight.

C. Society

As one of the most successful companies in the world, it is appropriate that Alphabet invests in economic empowerment programs and supports underserved communities. It historically has done so through economic opportunity programs, investments, supplier partnerships, and philanthropic efforts. Alphabet and Google should continue and expand those efforts.

1. Economic Opportunity

We reviewed economic opportunity programs with respect to skills development, economic investments, and supplier diversity. On skills development and small business support, we focused on Google for Startups, which runs grant-based accelerator programs for startups and helps grow businesses in tech, and Grow with Google, which provides free training, tools, and resources to help individuals and small business owners develop their careers and businesses. On economic investments, we examined the impact of Alphabet’s three venture capital teams: GV (formerly Google Ventures), Gradient Ventures, and CapitalG. Finally, we engaged with Google’s Supplier Diversity team, which is responsible for driving opportunities for diverse-owned businesses in Google’s supplier base. We discussed programs and opportunities with internal stakeholders focused on digital skilling, procurement, seed and growth stage investing, and other economic opportunity mechanisms across Google and Alphabet, including with Alphabet’s Treasurer who oversees these programs.

Observations

Google and Alphabet engage in multifaceted and varied economic opportunity initiatives, including efforts to provide support for entrepreneurs, to offer jobs and digital skills training, and to establish partnerships with diverse suppliers.

Digital Skilling and Small Business Support. Google for Startups offers programs and support to help underrepresented startup founders grow their businesses. Since 2020, Google has invested \$34 million in grant-free capital, among other support, to Black and Latino entrepreneurs in the United States through the Google for Startups Black and Latino Founders Funds. Google also offers accelerators—programs that provide growth-stage startups with technical, product, and leadership training—designed to help underrepresented startup founders grow their businesses, including a Women Founders accelerator. Each accelerator provides

cohorts of 10-15 startups with products, professional networks, and technical expertise. Google for Startups also supports outside initiatives. For instance, in May 2022, Google for Startups announced a 20-week fellowship program, VHLX, to support early-stage Latino founders across the United States.

Grow with Google provides free training, tools, and resources to individuals and small businesses, including those from underrepresented communities. For instance, Grow with Google offers Career Certificates through online digital skills training programs for job seekers in high-growth fields like data analytics and IT support, including programs serving underserved communities. In February 2022, for example, Google launched a \$100 million fund to provide 20,000 jobseekers with digital skills training, with a goal of generating \$1 billion in wage gains. Google is partnering with Social Finance, Merit America, and Year Up to provide add-on resources such as childcare, rent assistance, and other tools to complete the Google Career Certificates courses.

Grow with Google also offers “Digital Coaches” who provide digital skills training and coaching to assist Black, Latino, and Indigenous-owned small business owners. In June 2022, Google committed more than \$7 million to support justice-impacted communities. As a part of this investment, Google launched the Grow with Google Fund for Justice-Impacted Communities to help nonprofits connect with job seekers who have some form of criminal record.

Building on this work, there may be more opportunities to better serve marginalized and historically under-resourced communities. For example, Google for Startups could build on its successful Founders Funds and accelerator programs by adding initiatives geared towards other historically marginalized groups, such as Indigenous founders.

Google could also add pilot programs in markets with more nascent startup ecosystems. Grow with Google could deepen its engagement with rural communities, which often face more difficulties than their urban counterparts in accessing competitive job skilling. By working with community organizations and partners focusing on rural communities, Grow with Google could reach additional underserved populations.

Venture Capital. Alphabet is home to several venture capital teams. Venture capital firms invest in new ideas, provide guidance and expertise to new companies, and, in turn, seek to generate a return on their investment. Typically, they are not philanthropic or social enterprise organizations, but in selecting ideas and entrepreneurs to support, venture capital firms can expand access to capital and opportunity for new founders. And in setting expectations for and providing guidance to portfolio companies, venture capital firms can promote economic opportunity for a new generation of companies.

In 2020, Alphabet committed to investing \$100 million in Black-led startups and venture capital firms in an effort to expand access to capital for Black founders and funders. By the end of 2022, a cross-functional group of Alphabet companies had deployed the entirety of those funds and provided training, technology, and advice to recipients.

Alphabet's venture capital firms also work to expand access to opportunity through their portfolio companies. Each of Alphabet's internal venture capital teams takes a different approach to selecting portfolio companies and engaging with them on DEI issues. GV, a multi-stage investment organization, has an expansive strategy for promoting DEI internally and for working with portfolio companies on DEI issues. In 2020, GV hired its first Equity, Diversity, and Inclusion (EDI) Partner, who is responsible for building inclusive strategies around hiring and employee engagement, broadening investor networks, and advising GV's portfolio companies. GV hired a second EDI partner to further support portfolio company leaders, including by providing one-on-one coaching; sharing best practices on DEI governance development and respectful and inclusive work environments; and encouraging portfolio companies to increase board and executive-level diversity. CapitalG has a committee that works on equity issues and provides DEI-focused training for the firm's leaders and those responsible for interviewing and hiring. And although Gradient Ventures is smaller and newer, and thus has less formal DEI infrastructure, it integrates DEI considerations into its investment approach and hosts town halls for portfolio companies to assist them with creating DEI infrastructure.

Going forward, Alphabet's venture capital teams could benefit from sharing strategies, programming, and lessons learned to enhance internal and portfolio company-focused DEI strategies. For example, GV's best practices on DEI governance could be adopted by CapitalG and Gradient Ventures so that all portfolio companies across Alphabet have access to materials to support DEI infrastructure development.

Supplier Diversity. Over the past few years, Google has accelerated its investment in supplier diversity by growing the supplier diversity team and investing in supplier diversity initiatives. In 2021, it committed to spending \$1 billion with certified diverse-owned suppliers in the United States, ultimately exceeding that commitment and spending \$1.5 billion. In 2022, it increased its annual goal to \$2.5 billion (ultimately spending \$2.8 billion) and committed to expanding relationships with historically underrepresented groups worldwide. The Supplier Diversity team also partners with Dartmouth's Tuck School of Business to host the Digital Excellence Program: a three-day program that trains diverse businesses and entrepreneurs to develop strategies to scale their businesses. More than 425 leaders of diverse-owned businesses have graduated from the program and received over \$800,000 in scholarships.

In addition, certain teams and departments in Google have set expectations with external suppliers, including professional service firms, to provide opportunities for women and employees of color staffed on Google projects. We recommend more teams set expectations that

their external vendors and suppliers make efforts to staff Google projects with diverse teams and provide leadership and growth opportunities for underrepresented talent.

Community Investment. Google has also allocated resources to community investments. In 2020, Google created a \$180 million fund to support community development financial institutions (CDFIs), in partnership with the Opportunity Finance Network. In 2021, they distributed funds to more than 130,000 small- and medium-sized businesses, of which 27% were Black-owned, 17% were Latino-owned, and 37% were women-owned businesses. Further, Google and Alphabet have made significant commitments and contributions to affordable housing in the Bay Area. In 2022, Google provided an additional \$11 million in grants dedicated to building capacity and technical assistance for CDFIs. The Company committed more than \$1 billion to Bay Area affordable housing, with a \$250 million investment fund incentivizing developers to build 20,000 housing units (including 5,000 affordable units). In July 2022, Google announced that \$128 million of the \$250 million investment fund had been allocated to 18 organizations supporting the development of nearly two dozen affordable housing projects across the Bay Area.

2. Philanthropy

We evaluated Google.org, the Company's philanthropic arm that provides funding and access to products, technology, and expertise. We reviewed Google.org's processes for grant making and in-kind donations, indirect forms of philanthropic giving, and initiatives geared towards underrepresented communities, focusing on how these efforts incorporate civil rights principles.

Our review was informed by interviews with individuals from across Google.org, including those responsible for philanthropic efforts focused on underrepresented communities and to racial justice initiatives broadly.

Observations

Google.org employs a variety of creative efforts to support underserved communities and increase opportunity. Google.org also works with Google and Alphabet's economic opportunity arms to deploy resources and support to maximum effect. Google.org donates approximately \$200 million annually to nonprofits and social enterprise organizations, many of which serve marginalized communities.

In recent years, Google.org committed over \$100 million to the COVID-19 pandemic response and engaged in significant grantmaking to racial justice causes following the murder of George Floyd and the rise in anti-Asian and Pacific Islander hate crimes. In 2022, Google.org provided a \$3 million grant, and a full-time team of Google.org Fellows who work pro-bono, to support

Code for America and its work to promote automatic record clearance for justice-impacted job seekers. Google.org also supports initiatives by Google and Alphabet, providing grants in support of job skilling, affordable housing, and economic opportunity programs.

To increase its impact, Google could enhance its informal workstreams with formal strategies for serving underrepresented communities and important causes—including racial justice and affordable housing, among others. Creating pathways for the relevant teams to coordinate their disparate efforts will also promote sustainable progress. Google could also communicate more with external stakeholders about Google.org’s goals and activities, providing increased transparency and promoting wider acknowledgement of the Company’s commitment to philanthropy.

IV. Conclusion

Google’s commitment to protecting and advancing civil rights is real and tangible. To enhance its commitment to civil rights and DEI efforts, the Company—with its large array of products and significant workforce—can scale and standardize its programs and policies. Attending to the civil rights issues that have emerged from new technologies is complex and challenging—but it is vital work. Opportunities to advance civil rights and inclusion will continue to evolve as civil rights concerns, demographics, and the workforce change over time. As the Company recognizes, it will need to continue to develop and expand its efforts, remain vigilant in identifying and responding to these new threats, and ensure that it has a civil rights infrastructure adequately scaled to reach across Google’s varied work and initiatives.

We hope that the areas of opportunity identified in this audit will help the Company build on the investments it has already made and advance civil rights, equity, inclusion, and opportunity, both within Google and for its users.