

Verily

2022 Statement Against Modern Slavery

Introduction

Verily Life Sciences LLC and its subsidiaries, Verily Ireland Limited and Verily UK Limited (together, “Verily”) is committed to treating all workers with respect and dignity, providing safe working conditions, and operating ethically. We stand against all forms of modern slavery and actively work to prevent it from taking place in our supply chains and business operations.

Verily is issuing this statement pursuant to the UK Modern Slavery Act and California Transparency in Supply Chains Act, which require Verily to disclose its efforts to ensure that modern slavery does not occur in its supply chains and business operations. This is our fourth statement, covering our 2022 financial year (January 1, 2022 - December 31, 2022).

Throughout this statement, we reference “modern slavery,” which includes slavery, servitude, forced or compulsory labor, and human trafficking. In addition, we reference “extended workforce suppliers” and “our extended workforce,” which includes suppliers and supplier employees.

Structure, business, and supply chain

Verily was launched from Google X as Google Life Sciences in 2015. Now Verily since 2016, we are an Alphabet health technology company focused on research, care and risk protection to deliver on the promise of precision health. Verily does not own or operate commercial manufacturing facilities. Because of this, its anti-slavery efforts require strong collaboration and engagement with suppliers that manufacture products on its behalf.

Internal management, accountability, and programs

Verily participates in Google’s Responsible Supply Chain programs and, as such, is subject to the policies and procedures associated with the program. Regular updates on the status of the Responsible Supply Chain Program—which includes addressing modern slavery risk—are provided to a Steering Committee composed of Google’s Chief Compliance Officer and leaders from Google’s and Verily’s product areas. While day-to-day compliance program management is operated by Google, Verily-specific supply chain sustainability or modern slavery compliance concerns are addressed in collaboration with Verily.

Policies addressing ethical conduct and prevention of modern slavery

Verily has adopted a [Code of Conduct](#) (the “Code”), which sets forth expectations regarding compliance with laws and regulations, such as the UK Modern Slavery Act and the California Transparency in Supply Chains Act. The Code encourages Verily employees to contact Verily’s anonymous Verily Ethics Hotline (“Hotline”) to raise questions or concerns about the Code and to report suspected violations. Employees failing to follow the Code can be subject to disciplinary action, including termination of employment. Failure of a Verily contractor, consultant or other covered service provider to follow the Code can result in termination of its relationship with Verily.

Verily has implemented a Policy Against Modern Slavery, which prohibits Verily employees from knowingly engaging in or supporting human trafficking or child labor practices in its business operations. A Verily employee, contractor, service provider, supplier, or vendor who knowingly engages in or otherwise takes action to support human trafficking or child labor practices will be disciplined up to and including termination of employment or business relationship.

Verily has implemented a [Supplier Code of Conduct](#) (the “Supplier Code”) for its product and research and development suppliers (collectively, “suppliers”). The Supplier Code is based on the Electronic Industry Citizenship Coalition Code of Conduct; international standards, such as the United Nations Guiding Principles on Business and Human Rights and the Universal Declaration of Human Rights; and Verily’s own values. Verily seeks to have all of its direct suppliers certify compliance with the Supplier Code either through direct acceptance of the Supplier Code during onboarding or the inclusion of a certification clause in an executed contract. The Supplier Code sets standards designed to protect the health, safety, and treatment of workers, including the prohibition of any form of forced, bonded (including debt bondage), or indentured labor; involuntary prison labor; sex trafficking; or slavery or trafficking of people.

Training

Training on the Code reinforces the expectation that Verily employees, temporary workers, and contractors (collectively, “Verily workers”) follow applicable laws and report concerns of illegal or unethical activity. Verily has in place an online training course that includes anti-modern slavery education for Verily workers in roles related to supplier management.

Risk assessment

Verily’s supply chain is assessed for risk associated with modern slavery. The factors considered in these assessments are based on international standards described by the Universal Declaration of Human Rights and the International Labour Organization, as well as industry standards. Verily works with Google’s Responsible Supply Chain team to evaluate and address modern slavery risks, among other risks, presented by its suppliers.

Due diligence and contracting

Verily’s contracting practices are managed by Verily’s legal team, in alignment with the policies and processes developed by Google regarding supplier conduct. Appropriate due diligence is conducted on Verily’s direct suppliers.

As part of the due diligence process, suppliers complete a self-assessment questionnaire about their management systems. The due diligence process includes company information, warehouse, acceptance activities, capabilities assessments, and certifications (if applicable). For higher-risk production suppliers, Verily performs comprehensive background checks, an examination of labor-related red flags that appear in publicly available databases and media sources, and a review of suppliers’ names against human trafficking watch lists.

If red flags are discovered, appropriate follow-up is conducted to remediate those issues. In certain cases, Verily may decide to no longer pursue a relationship or to terminate the current relationship with a supplier.

Assessing and reporting on effectiveness


Periodic, independent third-party or internal audits are performed at higher-risk Verily suppliers' facilities, as appropriate. The audits include factory tours, meetings with management, on-site worker interviews, document reviews, and assessments of related areas, such as dormitories, cafeterias, wastewater treatment facilities, and warehouses. The audit protocol is designed to assess suppliers' performance in the areas covered by the Supplier Code, including modern slavery risk. Any issues identified during the audit are investigated to determine root causes and develop corrective action plans. While audits are not unannounced, Verily supplier managers are trained to report any concerns they might observe on an ongoing basis. In addition to audits, if appropriate, risk would be assessed at Verily's suppliers via direct engagement with workers.

Reporting concerns or raising issues related to modern slavery

Issues related to modern slavery can be reported by Verily workers via their manager, Human Resources, Trust & Compliance or the Hotline. The Hotline gives callers an option to report concerns anonymously. The mechanisms for reporting are promoted through internal policies, communications, and training. In addition, Verily strictly prohibits retaliation for raising concerns.

If a modern slavery concern is raised through the Hotline or other reporting channels, Verily's Trust & Compliance team would coordinate with appropriate stakeholders at Verily and at Alphabet to investigate and address the issue. If a reported concern is substantiated, the corrective response may involve working with the supplier to ensure that the issue is addressed or, if that is not possible, terminating the supplier.

This statement was approved by Verily Life Sciences LLC Operating Board.


0E6E544C8E87428...

Stephen Gillett
Board Member, Verily Life Sciences LLC
June 2023