

Human Rights Impact Assessment - AI/Targeted Ads Alphabet

RESOLVED: Shareholders direct the board of directors of Alphabet Inc. to publish an independent third-party Human Rights Impact Assessment (the “Assessment”), examining the actual and potential human rights impacts of Google’s targeted advertising policies and practices throughout its business operations. This Assessment should be conducted at a reasonable cost; omit proprietary and confidential information, as well as information relevant to litigation or enforcement actions; and be published on the company’s website by June 1, 2024.

WHEREAS: Google advertising accounted for approximately 80% of Alphabet’s revenue in 2021. Alphabet’s ad business, including Google Search, YouTube Ads and Google Network, has grown significantly in recent years, reaching \$209 billion in 2021.¹

Algorithmic systems are deployed to enable the delivery of targeted advertisements, determining what users see. This often results in and exacerbates systemic discrimination and other human rights violations. Google’s current ad infrastructure is driven by third-party cookies, which enable other companies to track users across the internet by accumulating vast troves of personal and behavioral data on Google users. This further exposes Google to violating user privacy.

While Google has launched a series of projects that aim to address some privacy shortcomings of its current advertising system, it has not shown evidence of any human rights due diligence associated with these plans. In 2022, Google scrapped FLoC, its planned replacement for third-party cookies, due to widespread concern about privacy impacts. The Company has repeatedly delayed the deprecation of cookies, most recently to late 2025.² This means its adverse impacts will endure. Furthermore, Google does not disclose whether it plans to conduct a structured human rights review of FLoC’s successor projects, such as Topics API.

Google asserts that human rights are “integrated into processes and procedures across the company” and has established executive oversight of human rights issues.³ However, it provides no details on how this applies to its dominant source of revenue.⁴ Google has previously published a summary of a third-party HRIA of a celebrity facial recognition algorithm.⁵ Its targeted ad systems, which affect billions, merit at least the same due diligence and public disclosure, particularly as Google and its peers develop new approaches to targeting advertising.

Legislation in Europe⁶ and the United States⁷ is poised to severely restrict or even ban targeted ads largely due to concerns about the underlying algorithms. Given the predominance of advertising in Alphabet’s business model, the failure to implement effective human rights policies and processes may expose shareholders to material legal, regulatory and reputational risks.

A robust and transparent Assessment is essential to enable the company to better identify, address, mitigate and prevent adverse human rights impacts. It will also contribute to establishing an effective system of accountability for human rights for the industry as a whole. Lastly, such an Assessment will assure shareholders that its business model is well positioned in the face of increasing regulation.

1 https://abc.xyz/investor/static/pdf/2021_alphabet_annual_report.pdf?cache=3a96f54

2 <https://martech.org/google-delayed-third-party-cookie-deprecation-why-and-whats-next/>

3 <https://about.google/human-rights/>

4 <https://rankingdigitalrights.org/bts22/companies/Google>

5 <https://services.google.com/fh/files/blogs/bsr-google-cr-api-hria-executive-summary.pdf>

6 [https://ec.europa.eu/commission/presscorner/detail/en/ip_22_6423;](https://ec.europa.eu/commission/presscorner/detail/en/ip_22_6423)
<https://www.europarl.europa.eu/news/en/press-room/20220412IPR27111/digital-services-act-agreement-for-a-transparent-and-safe-online-environment>

7 shorturl.at/opsI4