

December 17, 2018

David Drummond
Corporate Secretary
Alphabet Inc.
1600 Amphitheatre Parkway
Mountain View, CA 94043

Via e-mail to corporatesecretary@abc.xyz

Re: Shareholder proposal for 2019 annual meeting

Dear Mr. Drummond,

I write to file the attached proposal to be included in the proxy statement of Alphabet, Inc., for its 2019 annual meeting of stockholders.

Azzad Asset Management has been a shareholder in Alphabet for many years. As a socially responsible asset manager, we integrate environmental, social, governance, and human rights factors into our stock selection process. We were therefore deeply concerned when we learned that Google is considering re-entering the search market in China.

In light of the Chinese government's repressive censorship and surveillance practices, we are concerned that a censored Google search product could further enable ongoing human rights violations.

China's government censorship and surveillance has seemingly intensified in recent years. For example, government intrusion into the lives of residents of the Xinjiang region in western China has expanded to what the Associated Press described as "[a]ll-encompassing, data-driven surveillance." We are concerned not only that the Chinese government is tracking everything its citizens do online, but that they are also using that information to commit grave human rights violations.

Of course, the Chinese government will track its people's online activities regardless of Google's participation, but Google's powerful technology could produce levels of information that China wouldn't be able to reach on its own.

We believe there are serious human rights implications inherent in a technology services company doing business in China. With that in mind, we are filing this shareholder resolution seeking a human rights impact assessment for a possible Google search product in China.

Please find the resolution attached, to be included in the proxy statement of Alphabet Inc., for its 2019 annual meeting of stockholders in accordance with Rule 14a-8 of the general rules and regulations of the Securities Exchange Act of 1934. We will have a representative at the company's annual meeting to move the resolution.



AZZAD

ASSET MANAGEMENT

Invest with faith

Azzad Asset Management is the beneficial owner of more than \$2,000 of GOOGL common stock; verification of ownership from our custodian Folio Institutional is attached. We have held the requisite amount of stock for more than a year and intend to maintain ownership beyond Alphabet's 2019 annual general meeting.

Azzad Asset Management is the lead filer of this proposal. We may be joined by one or more co-filers. Please direct any communications about this proposal to me at joshua@azzad.net or 703-207-7005 x109.

Respectfully yours,

Joshua Brockwell
Director of Investment Communications

Enclosures

Google Search in China

Whereas,

Google is considering introducing products that could enable censorship and potentially dangerous surveillance of citizens of China. This may pose significant legal, reputational, and financial risk for the Company.

In March 2010, Google announced it would stop censoring search services on its Chinese search site and would redirect users to a site offering uncensored search. Google's David Drummond said, "It is good for our business to push for free expression."

In August 2018, however, the Intercept reported that Google was developing a censored search engine — codenamed Dragonfly — for the Chinese market that would comply with China's repressive censorship laws and "blacklist websites and search terms about human rights, democracy, religion, and peaceful protest."

Google CEO Sundar Pichai subsequently confirmed the company is considering a censored search product. In congressional testimony, Pichai noted "internal efforts" but would not provide any detail.

Human rights organizations and lawmakers have called on Google to end work on Dragonfly. U.S. senators wrote to Pichai that Dragonfly "risks making Google complicit in human rights abuses related to China's rigorous censorship regime." Google employees have quit to avoid working on products that enable censorship; 1,400 current employees have signed a letter protesting Dragonfly. Employees said: "Currently we do not have the information required to make ethically-informed decisions about our work, our projects, and our employment." Some employees have threatened to strike. Dragonfly may also be inconsistent with Google's AI Principles.

Dragonfly could further enable surveillance by allowing the Chinese government to monitor individuals' Google searches by tying search results to phone numbers. Uighurs in China reportedly already face draconian measures, which require them to install tracking apps on their smartphones that monitor everything they do online. Similar practices could put Google users in China at risk of interrogation or detention. Patrick Poon, China expert for Amnesty International, has asked: "Would Google rollover and hand over personal data should the Chinese authorities request it?"

Former Google employees say senior management excluded the Company's security and privacy teams from key meetings about Dragonfly and "tried to sideline a privacy review of the plan that sought to address potential human rights abuses."

As a member of the Global Network Initiative, Google has committed to conduct "human rights due diligence to identify, prevent, evaluate, mitigate and account for risks to the freedom of expression and privacy rights that are implicated by the company's products, services, activities and operations."

Shareholders are concerned by a growing gap between Google's stated values and actions, generating global controversy and presenting significant risk.

Resolved, shareholders request the Company publish a Human Rights Impact Assessment (at reasonable cost, omitting proprietary or legally privileged information), by no later than October 30, 2019, examining the actual and potential impacts of censored Google search in China.

Supporting Statement: Proponents recommend the assessment refer to the United Nations Guiding Principles on Business and Human Rights.