

## **Lobbying Expenditures Disclosure - Climate 2018 – Alphabet, Inc.**

**WHEREAS**, we believe it is important that Alphabet's lobbying positions, and processes to influence public policy, are transparent. Public opinion is skeptical of corporate influence on Congress and public policy, and controversial lobbying activity may pose risks to our company's reputation.

Alphabet spent approximately \$83 million between 2012 and 2016 on federal lobbying, according to Senate reports. And this figure may not include grassroots lobbying to influence legislation by mobilizing public support or opposition and does not include lobbying expenditures to influence legislation in all states.

**RESOLVED**, the shareholders of Alphabet request the Board prepare a report, updated annually, and disclosing:

1. Company policy and procedures governing lobbying, both direct and indirect, and grassroots lobbying communications.
2. Payments by Alphabet used for (a) direct or indirect lobbying or (b) grassroots lobbying communications, in each case including the amount of the payment and the recipient.
3. Description of the decision making process and oversight by management and the Board for making payments described in sections 2 and 3 above.

For purposes of this proposal, a "grassroots lobbying communication" is a communication directed to the general public that (a) refers to specific legislation or regulation, (b) reflects a view on the legislation or regulation and (c) encourages the recipient of the communication to take action with respect to the legislation or regulation. "Indirect lobbying" is lobbying engaged in by a trade association or other organization of which Alphabet is a member.

"Direct and indirect lobbying" and "grassroots lobbying communications" include efforts at local, state and federal levels.

The report shall be presented to the Audit Committee or other relevant Board oversight committees and posted on Alphabet's website.

**Supporting Statement:** We commend Alphabet for disclosure on its website on political spending and lobbying but the website still does not disclose details about payments used for lobbying by trade associations.

For example, the Chamber of Commerce spent approximately \$1.4 billion in lobbying since 1998, yet Alphabet's level of funding of the Chamber is secret. The Chamber also aggressively attacked the EPA for its actions combatting climate change. We urge Alphabet to utilize its role as a prominent member to challenge the Chamber's climate policy.

In contrast, Alphabet's website publicly affirms its commitment to "protecting the environment", a message we strongly support.

And Alphabet has done an outstanding job in advocating forward looking policies on issues like climate change and sets an example for other companies in its use of renewable energy and support for public policy backing renewables.

In September 2014 Chair Eric Schmidt announced on NPR that Alphabet had ended membership in ALEC, an organization that assists legislators and companies to promote model legislation. One high ALEC priority aims to repeal State renewable energy legislation. Chair Schmidt argued ALEC was "literally lying" about climate. We commend Alphabet for this act of leadership.

It is a logical next step for Alphabet to expand its public disclosure about lobbying.