UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

DIVISION OF
CORPORATION FINANCE

April 15, 2025

Shuangjun Wang
Cleary Gottlieb Steen & Hamilton LLP

Re: Alphabet Inc. (the "Company")
Incoming letter dated February 4, 2025

Dear Shuangjun Wang:

This letter is in response to your correspondence concerning the shareholder proposal (the "Proposal") submitted to the Company by Tulipshare Fund 1 LP for inclusion in the Company's proxy materials for its upcoming annual meeting of security holders.

The Proposal requests that the board publish a publicly accessible report providing tangible, comprehensive transparency regarding the Company's efforts to improve the risks posed by its advertising practices and prevent data collection of children across its platforms, with a specific focus on improving disclosure of certain listed issues.

There appears to be some basis for your view that the Company may exclude the Proposal under Rule 14a-8(i)(11). We note that the Proposal is substantially duplicative of a previously submitted proposal that will be included in the Company's 2025 proxy materials. Accordingly, we will not recommend enforcement action to the Commission if the Company omits the Proposal from its proxy materials in reliance on Rule 14a-8(i)(11).

Copies of all of the correspondence on which this response is based will be made available on our website at https://www.sec.gov/corpfin/2024-2025-shareholder-proposals-no-action.

Sincerely,

Rule 14a-8 Review Team

cc: Constance Ricketts
Tulipshare Capital LLC

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February 4, 2025

VIA ONLINE SHAREHOLDER PROPOSAL FORM

U.S. Securities and Exchange Commission
Division of Corporation Finance
Office of Chief Counsel
100 F Street, N.E.
Washington, DC 20549

Re: Shareholder Proposal Submitted by Tulipshare Capital LLC on behalf of Tulipshare Fund 1 LP

Ladies and Gentlemen:

We are writing on behalf of our client, Alphabet Inc., a Delaware corporation ("Alphabet" or the "Company"), pursuant to Rule 14a-8(j) under the Securities Exchange Act of 1934, as amended (the "Exchange Act"), to notify the staff of the Division of Corporation Finance (the "Staff") of the Securities and Exchange Commission (the "Commission") of the Company's intention to exclude the shareholder proposal (the "Duplicate Proposal") and supporting statement (the "Duplicate Supporting Statement") submitted by Tulipshare Capital LLC on behalf of Tulipshare Fund 1 LP (the "Proponent"), by letter dated December 27, 2024, from the Company's proxy statement for its 2025 annual meeting of shareholders (the "Proxy Statement").

In accordance with SEC Staff Legal Bulletin No. 14D (Nov. 7, 2008) ("SLB 14D") and other related Staff guidance, we are submitting this letter and its attachments to the Staff electronically through the Staff's online Shareholder Proposal Form. In accordance with Rule 14a-8(j), we are simultaneously sending a copy of this letter and its attachments to the Proponent as notice of the Company's intent to omit the Duplicate Proposal from the Proxy Statement. The Company expects to file its definitive Proxy Statement on or about April 25, 2025. This letter is being filed with the Commission no later than 80 calendar days before the intended definitive Proxy Statement filing date in accordance with Rule 14a-8(j). Rule 14a-8(k) and Section E of SLB 14D provide that shareholder proponents are required to send companies a copy of any correspondence that the shareholder proponent elects to submit to the Commission or the Staff. Accordingly, we are taking this opportunity to remind the Proponent that if the Proponent submits correspondence to the Commission or the Staff with respect to the Duplicate Proposal, a copy of that correspondence should concurrently be furnished to the undersigned on behalf of the Company.

THE DUPLICATE PROPOSAL

The Duplicate Proposal and Duplicate Supporting Statement are attached hereto as Exhibit A. The Duplicate Proposal states:

RESOLVED: Shareholders request that the Board publish a publicly accessible report—prepared at reasonable expense, excluding proprietary information—providing tangible, comprehensive transparency regarding Alphabet's efforts to a) improve the risks posed by its advertising practices and b) prevent data collection of children across its platforms, with a specific focus on improving disclosure of the following issues:

1. Detailed Breakdown of Data Collection, Sharing, and Retention: including the actions Alphabet is taking across its platforms to ensure compliance with the Kids Online Safety Act and the Children and Teens' Online Privacy Protection Act 2.0 which aims to expand the age range covered by the original law to include teenagers, providing stricter online privacy protections for children and teens.
2. Improved User Consent Mechanisms
3. Use of Data for Ad Targeting and Impact Assessments/Audits on User Privacy and Business: including the improvements made to prevent data collection of and ad-targeting to children.
4. Details on Cross-Platform Data Integration: including the ways in which Alphabet prevents the use of cookies to target ads and potentially harmful content to children across its platforms, such as Google Chrome, YouTube, and YouTube Kids.
5. Explicit details on how Alphabet's platforms, including YouTube/YouTube Kids, assess and determine what content is permitted for child consumption, including which paid ads are approved as "family-friendly" and the qualifications of the content moderators.

BASIS FOR EXCLUSION

In accordance with Rule 14a-8(i)(11), we hereby respectfully request that the Staff confirm that no enforcement action will be recommended against the Company if the Duplicate Proposal and the Duplicate Supporting Statement are omitted from the Proxy Statement because the Duplicate Proposal substantially duplicates another proposal previously submitted to the Company that the Company intends to include in the Proxy Statement.

ANALYSIS

Under Rule 14a-8(i)(11), the Duplicate Proposal may be excluded because it substantially duplicates an earlier submitted proposal.

A. Background

On December 19, 2024, prior to receiving the Duplicate Proposal, Alphabet received a shareholder proposal (attached as Exhibit B to this letter) and supporting statement (the "Prior Supporting Statement," and together with the Duplicate Supporting Statement, the "Supporting Statement") from the Boston Common Asset Management (the "Prior Proposal," and together with the Duplicate Proposal, the "Proposals"). The Prior Proposal requests "that the Board of Directors publishes a report (prepared at reasonable expense, excluding proprietary information) that includes quantitative metrics appropriate to assessing whether and how Alphabet/YouTube has improved its performance globally regarding child safety impacts and actual harm reduction to children on its platforms." The Company intends to include the Prior Proposal in the Proxy Statement.

B. Overview of Rule 14a-8(i)(11)

Under Rule 14a-8(i)(11), a shareholder proposal may be excluded if it "substantially duplicates another proposal previously submitted to the company by another proponent that will be included in the company's proxy materials for the same meeting." The Commission has stated that "the purpose of [Rule 14a-8(i)(11)] is to eliminate the possibility of shareholders having to consider two or more substantially identical proposals submitted to an issuer by proponents acting independently of each other." Commission Release No. 12999 (November 22, 1976). When two substantially duplicative proposals are received by a company, the Staff has indicated that the company may exclude from its proxy materials the proposal it received later, unless the earlier proposal may otherwise be excluded. *See, e.g.,* Great Lakes Chemical Corp. (March 2, 1998) and Pacific Gas and Electric Co. (January 6, 1994).

A later proposal may be excluded as substantially duplicative of an earlier proposal despite differences in terms or breadth and despite the proposals requesting different actions. *See, e.g.,* The Walt Disney Company (January 31, 2024) (concurring in the exclusion of a proposal under Rule 14a-8(i)(11) requesting the board of directors consider listing on the company's website any recipient of $10,000 or more of direct contributions, excluding employee matching gifts, as duplicative of a prior proposal requesting a list of recipients of corporate charitable contributions of $5,000 or more); McDonald's Corporation (April 3, 2023) (concurring in the exclusion of a proposal under Rule 14a-8(i)(11) requesting a report detailing lobbying procedures including the company's payments to certain tax-exempt organizations as substantially duplicative of a proposal that did not request information about such payments); PepsiCo, Inc. (March 7, 2023) (concurring in exclusion under Rule 14a-8(i)(11) of a proposal relating to an independent board chair as substantially duplicative of a proposal despite the use of different words to phrase their shared request); Amazon.com, Inc. (April 6, 2022) (concurring in exclusion under Rule 14a-8(i)(11) of a proposal requesting the board commission an independent third-party audit on workplace health and safety, evaluating productivity quotas, surveillance practices, and the effects of these practices on injury rates and turnover as substantially duplicative of a proposal requesting the board commission an independent audit and report of the working conditions and treatment that warehouse workers face); Exxon Mobil Corporation (March 13, 2020) (concurring in exclusion under Rule 14a-8(i)(11) of a proposal as substantially duplicative where the Staff explained that "the two proposals share a concern for seeking additional transparency from the [c]ompany about its lobbying activities and how these activities align with the [c]ompany's expressed policy positions" despite the proposals requesting different actions); Exxon Mobil Corporation (March 9, 2017) (concurring in exclusion under Rule 14a-8(i)(11) of a proposal requesting a report on the company's political contributions as substantially duplicative of a proposal requesting a report on lobbying expenditures); and Wells Fargo & Company (February 8, 2011) (concurring in exclusion under Rule 14a-8(i)(11) of a proposal seeking a review and report on the company's loan modifications, foreclosures, and securitizations as substantially duplicative of a proposal seeking a report that would include "home preservation rates" and "loss mitigation outcomes," which would not necessarily be covered by the other proposal). The Staff has traditionally referred to Rule 14a-8(i)(11)'s substantial duplication standard as assessing whether the later proposal presents the same "principal thrust" or "principal focus" as a previously submitted proposal. *See* Pacific Gas and Electric Company (February 1, 1993).

The Staff has also permitted exclusion of proposals under Rule 14a-8(i)(11) where, despite sharing a common principal or thrust, the earlier- and later-received proposals contained different supporting statements. For example, in Pfizer Inc. (Dec. 20, 2018), the Staff concurred in the exclusion of an independent chair proposal where the supporting statement discussed the shortcomings of current board members based on experience and the ability for an independent director to strengthen the board's oversight process. The Staff agreed that the proposal was substantially duplicative of an earlier-received independent chair proposal in which the supporting statement noted a conflict of interest between the chief executive officer and an inside director and the ability of an independent director to mitigate such conflict.

C. The Duplicate Proposal Substantially Duplicates the Prior Proposal

The Proposals share the same principal thrust and have the same principal focus, which is to request a report identifying and addressing the Company's performance regarding child safety across its platforms, including its YouTube platform. A comparison of the Proposals demonstrates that they address the same subject matter and share the same objective:

Both Supporting Statements express concerns about disclosures on compliance with legislation relating to child safety.	
Prior Proposal	**Duplicate Proposal**
"The U.S. proposed Kids Online Safety Act requires companies to prevent or mitigate child risks including suicide, eating disorders and substance abuse. YouTube lists steps taken to improve child safety, but it has no publicly available child	"with a specific focus on improving disclosure of the following issues: … the actions Alphabet is taking across its platforms to ensure compliance with the Kids Online Safety Act and the Children and Teens' Online Privacy Protection Act

safety or harm reduction performance metrics for investors and stakeholders to judge the effectiveness of Alphabet's announced tools, policies and actions."	2.0 which aims to expand the age range covered by the original law to include teenagers, providing stricter online privacy protections for children and teens."

Children's safety is a priority topic in both Proposals, with both Proposals referencing the Kids Online Safety Act and requesting that the Company report on the actions and steps the Company has taken to ensure compliance with the legislation and to improve child safety and protections on its platforms.

Both Supporting Statements express concerns about children's data privacy.	
Prior Proposal	**Duplicate Proposal**
"YouTube paid a record $170 million fine to the Federal Trade Commission in response to allegations that YouTube illegally harvested children's data …"	"Google was fined $170 million by the FTC after finding YouTube illegally collected personal information from children without their parents' consent …"

More specifically than just child safety, both Proposals are focused on online safety with respect to children's data privacy. In addition to referencing the same legislation and requesting additional reporting on the Company's steps towards compliance under the new legislation, both Proposals also reference the same FTC fine in connection with an alleged child data privacy issue as an example of what the respective proponents want to see the Company address in the requested reports.

Both Supporting Statements express concerns about the impact the Company's products may have on children, and specifically, the impact of YouTube.	
Prior Proposal	**Duplicate Proposal**
"Social media impacts children's brains differently than adult brains. It poses physical and psychological risks that children and teens are unprepared for …" ". . . YouTube is intentionally addictive and harm kids' mental health." "YouTube is often noted as a primary online channel for grooming and coercion, livestreaming, and housing Child Sexual Abuse Exploitation material." "YouTube comment sections can be a place where cyberbully of content creators	"YouTube has emerged as the dominant platform for children's content consumption in the United States, . . ." "Researchers have found YouTube videos often miss some of the key characteristics that help children learn while they watch as compared to television, . . ." "[The report should include] the ways in which Alphabet prevents the use of cookies to target ads and potentially harmful content to Children across its platforms,

and their fans as well as youth users is common." "Children using YouTube may experience depression, anxiety and body dissatisfaction related to social comparisons on the platform." "In 2023, Fairplay raised concerns with the FTC about Google's ads targeted to children, reporting that YouTube placed its behavioral ads on children's channels 1,446 times."	such as Google Chrome, YouTube, and YouTube Kids. . ." "Numerous children's advocacy groups have filed complaints with the FTC alleging YouTube Kids exposes children to pernicious influences and violates children's privacy. . ." "In 2024, 53% of children aged two to 12 reported seeing ads on YouTube—significantly outpacing other platforms. . ." ". . . 16% of children in the same age group asking their parents to purchase products after seeing YouTube commercials."

Both Proposals are clearly focused on the impacts that the Company's products and services have on underage users. However, while the Company provides many different products and services to consumers (including children), both Proposals are focused solely on YouTube. The Prior Proposal and accompanying Prior Supporting Statement names YouTube fourteen times (excluding footnote references) and does not reference any other product or service that the Company provides. The Duplicate Proposal and accompanying Duplicate Supporting Statement names YouTube fifteen times (excluding footnote references) and only references one other service once in passing (excerpted above). And even more specifically, both Supporting Statements focus on the creator-made content and advertisements that children see on YouTube. Each of the Proposals cite various concerns about the quality and safety of the content uploaded by creators and the persuasiveness of the advertisements included on the service. In addition, both Supporting Statements express similar concerns about how YouTube has established prominence as a social media app for children. For example, the Proponent alleges in the Duplicate Supporting Statement that "YouTube has emerged as the dominant platform for children's content consumption in the United States, with 81% of children aged two to 12 indicating in surveys that they had recently watched content on the site and spent an average of one hour and 48 minutes per day dedicated to YouTube viewing," while the Prior Proposal alleges that "[a] Harvard study cited in 2022 YouTube generated the highest ad revenue out of all the platforms from users 12 and under – ($959.1 million) and derived 27 percent of its overall revenue from users under 18." Both Proposals clearly are focused on the same product/service (and the same key components of the service) with respect to the concerns the respective proponents raise in their Proposals, which means the reports requested in the Proposals would accordingly be of the same limited scope.

Both Proposals seek a report relating to child safety.	
Prior Proposal	**Duplicate Proposal**
"Shareholders request that the Board of Directors publishes a report … that includes quantitative metrics appropriate to assessing whether and how Alphabet/YouTube has improved its performance globally regarding child safety impacts and actual harm reduction to children on its platforms."	"Shareholders request that the Board publish a publicly accessible report … providing tangible, comprehensive transparency regarding Alphabet's efforts to a) improve the risks posed by its advertising practices and b) prevent data collection of children across its platforms …" "… including the actions Alphabet is taking across its platforms to ensure compliance with the Kids Online Safety Act and the Children and Teens' Online Privacy Protection Act 2.0…" "…including the improvements made to prevent data collection of and ad-targeting to children." "…including the ways in which Alphabet prevents the use of cookies to target ads and potentially harmful content to children…" "…Explicit details on how Alphabet's platforms, including YouTube/YouTube Kids, assess and determine what content is permitted for child consumption…"

Although the exact wording of these portions of the Duplicate Proposal and the Prior Proposal is not identical, they both seek a report on the same topic: child safety and harm/risk reduction for children on the Company's various platforms. Both Proposals request that the report discuss the Company's practices and the results of its initiatives with respect to child safety on the Company's platforms, even though the specific wording is different (e.g., "child safety impacts" in the Prior Proposal versus "compliance with the Kids Online Safety Act" in the Duplicate Proposal; "harm reduction to children" in the Prior Proposal versus "ways in which Alphabet prevents . . . potential harmful content to children" in the Duplicate Proposal). Both Proposals also include specific requests to disclose the Company's improvements to its platforms to protect children and prevent data collection of children (which reduces harm to children). Although the Duplicate Proposal includes more requested items to disclose, they all fall into the same category of requests: information that aims to clarify how Alphabet is performing in terms of protecting children's safety, protecting their privacy and personal data, and preventing harmful content from being accessible to children.

Based on these excerpts, the intended scope of coverage in both reports is clearly consistent between the Duplicate Proposal and the Prior Proposal. Although the specific language in the Proposals may differ, the Proposals both call for the same action – the issuance of a report identifying and addressing the Company's performance regarding child safety across its platforms, and more specifically, its YouTube platform. The fact that the Duplicate Proposal goes into more detail on the specific issues that they request to be included in the report does not change this analysis. The report that the Company would produce to implement the Prior Proposal would be substantively identical to the report the Company would produce to implement the Duplicate Proposal. If the voting outcome on the two proposals differed, the shareholder vote would not provide guidance on what actions shareholders want the Company to pursue, given that the same actions would be necessary to implement both Proposals. As such, the Company's shareholders should not be required to twice consider whether the Company should issue a report that addresses child safety. The Duplicate Proposal may thus be excluded under Rule 14a-8(i)(11) because it substantially duplicates the Prior Proposal, which the Company intends to include in the Proxy Statement.

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Conclusion

By copy of this letter, the Proponent is being notified that for the reasons set forth herein, the Company intends to omit the Duplicate Proposal and Duplicate Supporting Statement from its Proxy Statement. We respectfully request that the Staff confirm that it will not recommend any enforcement action if the Company omits the Duplicate Proposal and Duplicate Supporting Statement from its Proxy Statement. If we can be of assistance in this matter, please do not hesitate to call me.

Sincerely,

Shuangjun Wang

Cc: Constance Ricketts, Tulipshare Capital LLC on behalf of Tulipshare Fund 1 LP

Enclosures:

Exhibit A – The Duplicate Proposal and Duplicate Supporting Statement

Exhibit B – The Prior Proposal and Prior Supporting Statement

Exhibit A

The Duplicate Proposal and Duplicate Supporting Statement

RESOLVED: Shareholders request that the Board publish a publicly accessible report—prepared at reasonable expense, excluding proprietary information—providing tangible, comprehensive transparency regarding Alphabet's efforts to a) improve the risks posed by its advertising practices and b) prevent data collection of children across its platforms, with a specific focus on improving disclosure of the following issues:

1. Detailed Breakdown of Data Collection, Sharing, and Retention: including the actions Alphabet is taking across its platforms to ensure compliance with the Kids Online Safety Act and the Children and Teens' Online Privacy Protection Act 2.0 which aims to expand the age range covered by the original law to include teenagers, providing stricter online privacy protections for children and teens.
2. Improved User Consent Mechanisms
3. Use of Data for Ad Targeting and Impact Assessments/Audits on User Privacy and Business: including the improvements made to prevent data collection of and ad-targeting to children.
4. Details on Cross-Platform Data Integration: including the ways in which Alphabet prevents the use of cookies to target ads and potentially harmful content to children across its platforms, such as Google Chrome, YouTube, and YouTube Kids.
5. Explicit details on how Alphabet's platforms, including YouTube/YouTube Kids, assess and determine what content is permitted for child consumption, including which paid ads are approved as "family-friendly" and the qualifications of the content moderators.

Whereas: YouTube has emerged as the dominant platform for children's content consumption in the United States, with 81% of children aged two to 12 indicating in surveys that they had recently watched content on the site and spent an average of one hour and 48 minutes per day dedicated to YouTube viewing, surpassing TikTok.[1] Nine-in-ten teens report using YouTube, with 73% going on YouTube daily, including 15% who describe their use as "almost constant," according to a 2024 Pew Research Center report.[2] Research also shows that, as of 2020, kids under the age of six spend more time watching videos on YouTube than watching television.[3] Researchers have found YouTube videos often miss some of the key characteristics that help children learn while they watch as compared to television, and the content and quality of media shown on YouTube are influenced by the likelihood that the algorithm will recommend a video.[4]

Children are similarly influenced by the ads they see across Alphabet's platforms. In 2024, 53% of children aged two to 12 reported seeing ads on YouTube—significantly outpacing other platforms like TikTok and television—with 16% of children in the same age group asking their parents to purchase products after seeing YouTube commercials.[5] Numerous children's advocacy groups have filed complaints with the FTC alleging YouTube Kids exposes children to pernicious influences[6] and violates children's privacy.[7] Google was fined $170 million by the FTC after finding YouTube

[1] https://www.statista.com/topics/3980/children-and-media-in-the-us/#topicOverview
[2] https://www.pewresearch.org/internet/2024/12/12/teens-social-media-and-technology-2024/
[3] https://www.commonsensemedia.org/sites/default/files/research/report/2020_zero_to_eight_census_final_web.pdf
[4] https://www.sri.com/wp-content/uploads/2024/03/APPROVE_White-Paper_03072024.pdf
[5] https://www.statista.com/topics/3980/children-and-media-in-the-us/#topicOverview
[6] https://www.wired.com/2015/11/youtubes-kids-app-is-coming-under-fire-for-junk-food-ads/
[7] https://www.nytimes.com/2023/08/23/business/youtube-ads-kids-children-privacy.html#:~:text=children%2Dprivacy.html-,YouTube%20Improperly%20Used%20Targeted%20Ads%20on%20Children's%20Videos%2C%20Watchdogs%20Say,on%20videos%20made%20for%20children.

illegally collected personal information from children without their parents' consent, equating to the largest civil penalty ever obtained by the commission in a children's privacy case, dwarfing the previous record fine of $5.7 million.[8]

[8] https://www.nytimes.com/2019/09/04/technology/google-youtube-fine-ftc.html

Exhibit B

The Prior Proposal and Prior Supporting Statement

Social media impacts children's brains differently than adult brains.[1] It poses physical and psychological risks that children and teens are unprepared for, including sextortion, grooming, hate group recruitment, human trafficking, cyberbullying, harassment, invasion of privacy, financial scams, and exposure to sexual, violent or self-harm content, among others.

Alphabet/YouTube face significant regulatory, reputational, and legal risks due to these unabated issues.

Mental Health:
The United States (U.S.) Surgeon General called for social media warning labels due to its impact on kids' mental health.[2] Forty-two states have sued Alphabet as the parent company, claiming YouTube is intentionally addictive and harm kids' mental health.[3]

Plaintiffs claim YouTube caused a myriad of mental and physical harms, including:

- **Cyberbullying:** YouTube comment sections can be a place where cyberbullying of content creators and their fans as well as youth users is common.
- **Depression:** Social platforms like YouTube often serve up idealized images of body type or lifestyle. Children using YouTube may experience depression, anxiety and body dissatisfaction related to social comparisons on the platform.
- **Self-harm and suicide:** In some cases, YouTube has presented suicidal ideation concepts. This can result in suicide or other forms of self-harm.[4]

Sexual Exploitation:
YouTube is often noted as a primary online channel for grooming and coercion, livestreaming, and housing Child Sexual Abuse Exploitation material. Google's smartphone apps can allow parents and other abusers to connect with pedophiles who pay to watch — and direct — criminal behavior.[5]

Children's Data Privacy & Targeted Ads:
YouTube paid a record $170 million fine to the Federal Trade Commission in response to allegations that YouTube illegally harvested children's data. A Harvard study cited in 2022 YouTube generated the highest ad revenue out of all the platforms from users 12 and under – ($959.1 million) and derived 27 percent of its overall revenue from users under 18.[6] In 2023,

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[1] https://www.apa.org/news/apa/2022/social-media-children-teens
[2] 4 https://www.cnn.com/2024/06/17/media/surgeon-general-social-media-apps-warning-label/index.html
[3] https://www.motleyrice.com/social-media-lawsuits/youtube
[4] https://www.motleyrice.com/social-media-lawsuits/youtube
[5] https://www.nytimes.com/2024/12/07/us/child-abuse-apple-google-apps.html
[6] https://www.msn.com/en-us/money/news/harvard-study-reveals-underage-users-contribute-11b-to-social-media-platforms-including-youtube-and-instagram/ar-AA1m8pk5

Fairplay raised concerns with the FTC about Google's ads targeted to children, reporting that YouTube placed its behavioral ads on children's channels 1,446 times.[7]

Legislation:
The European Union's Digital Services Act requires identifying, reporting and removing child sexual abuse material. The United Kingdom's Online Safety bill aims to protect children from online fraud and harmful content. The U.S. proposed Kids Online Safety Act requires companies to prevent or mitigate child risks including suicide, eating disorders and substance abuse."[8][9]

YouTube lists steps taken to improve child safety, but it has no publicly available child safety or harm reduction performance metrics for investors and stakeholders to judge the effectiveness of Alphabet's announced tools, policies and actions.

Resolved: Shareholders request that the Board of Directors publishes a report (prepared at reasonable expense, excluding proprietary information) that includes quantitative metrics appropriate to assessing whether and how Alphabet/YouTube has improved its performance globally regarding child safety impacts and actual harm reduction to children on its platforms.

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[7] https://arstechnica.com/tech-policy/2023/08/youtube-may-face-billions-in-fines-if-ftc-confirms-child-privacy-violations/

[8] https://abcnews.go.com/Politics/protecting-kids-online-bipartisan-cause-senators/story?id=97195752

[9] https://www.nbcnews.com/tech/social-media/kosa-kids-online-safety-act-speech-censor-rcna128249