

Appendix

Section I:

Internal Platform Exhibits

Exhibit 1



September and October 2021 Report

EU Code of Practice on Disinformation / COVID-19

TikTok is the fastest growing destination for short-form video. Our mission is to inspire creativity and bring joy. TikTok has [a strict set of community guidelines](#) and our Trust & Safety centre in Dublin leads the development of our policies and the moderation of content for EMEA.

● Executive summary

TikTok presents its report for the months of September and October 2021, as a signatory to the EU Code of Practice on Disinformation. This report outlines our continued efforts to help tackle the spread of COVID-19 and vaccine disinformation online.

In this report, we provide quantitative statistics showing the volume of content that we have tagged or removed during this reporting period, as well as user engagement with authoritative content on COVID-19 and vaccines.

Our quantitative statistics cover:

- The number of videos where we have added COVID-19 and vaccine tags
- The number of violation videos with the term 'Coronavirus' or 'COVID' [videos which have been removed]
- The number of medical misinformation videos [videos which have been removed]
- Page views and user views to our COVID-19 Center Page [user engagement metrics]
- Clicks, Impressions and CTR to our COVID-19 and vaccine notice tags [user engagement metrics]

The four front-end tools that we leverage to help tackle COVID-19 and vaccine dis/misinformation remain unchanged and can be described as follows:

- **COVID-19 and Vaccine Notice Tags** which point to authoritative content from the WHO or local government entities
- **Search Banners** on both COVID-19 and COVID-19 vaccine-related content leading to an FAQ featuring authoritative information from the WHO or government-endorsed local content

- **Updated FAQs** in the COVID-19 center from authoritative sources such as the WHO
- **Hashtag PSAs** which also point to authoritative content on COVID-19 vaccines

Beginning in late August and into the month of September, we increased the number of keywords/hashtags that can trigger Notice tags (Covid and Vaccine) and Banners (Covid and Vaccine). The data that we present for this report reflects that adjustment and we will continue to refine this process going forward. However, there may be data fluctuations over time which are organic in nature.

The data that we provide in this report covers France, Spain, Italy and Germany as these are markets where we both see some level of activity above a threshold that is worth reporting and where we have fact-checker partnerships in place. However, in order to reflect the overall picture across the EU, we also provide "all-EU" region data which includes those four Member States.

TikTok's advertising policy for COVID-19-related ads remains unchanged, with permitted ads generally coming from government authorities only.

As with previous months, we did not see any evidence of Coordinated Inauthentic Behaviour on our platform as regards this type of disinformation in the EU in September and October.

● **Partnerships**

TikTok's **fact-checking partners** are important to ensure quality in our content moderation process. Our fact-checker network for Europe includes the following organisations: AFP, Animal Político, Estadão Verifica, Facta.news, Lead Stories, Newtral, Politifact, SciVerify, Teyit and dpa Deutsche Presse-Agentur. And in terms

of EU languages, we have coverage in specific markets for English, Spanish, French, Italian, Dutch and German. Globally, we cover 24 languages and 58 markets and our fact-checkers provide us with bi-weekly misinformation trends reports covering both medical and non-medical misinformation.

TikTok is a member of the **WHO's Tech Task Force** and we have been attending monthly Task Force meetings since August alongside other major tech companies and global health experts. We have been briefed by the WHO on key pandemic trends including the progression of variants, vaccines and boosters, and this has fed into our own work on COVID-19/vaccine misinformation.

We also established a partnership with **Meedan's Digital Health Lab** in July. Since then, Meedan's team of experts has been providing our teams with a wide array of policy support on medical misinformation topics. In September and October, this included updates on what health experts are saying about the next stages of the pandemic and the future of COVID-19.

● Initiatives in the area of vaccine disinformation

Our vaccine-related initiatives include the following:

1. Our in-app information hub directs users to trusted information from respected experts when they search for vaccine information
2. A vaccine tag is applied to all COVID-19 vaccine videos and a banner redirects the user to verifiable, authoritative sources of information
3. Our [partnership with Team Halo](#) continues as a means to update users on vaccines
4. Our fact-checking partners and external experts keep us updated on platform-wide trends seen on COVID-19 vaccine misinformation

5. We prompt users if a video has been flagged as containing unsubstantiated content. [If a user then tries to share the video, they will be asked to pause and consider their next move before they choose to 'cancel' or 'share anyway'].

- **National initiatives to improve users' awareness**

Ireland

With the support of TikTok, the Department of Health in Ireland developed the **Redacted** account for science-based COVID-19 and vaccine information.

In September and October, the **Redacted** published 20 TikTok videos featuring influencer doctor **Redacted**, lab technicians and young people to discuss subjects such as,

- Debunking vaccine myths
- Explaining the roadmap to reopening
- 5 reasons why the vaccine was developed quickly
- Back to school tips on staying safe
- How the virus works
- Back to college tips on staying safe



Redacted

Spain

The **Redacted** launched a campaign on TikTok in order to raise awareness and build confidence in COVID-19 vaccines among young people.

The campaign ran from September 1st until September 22nd and as such, coincided with the end of summer and the beginning of the school year. The overall objective was to further strengthen the Government's vaccination strategy and TikTok was chosen as a platform due to its reach with the younger population.

Redacted

Germany

The German Federal Ministry of Health has developed campaigns with the support of TikTok, to inform a target group of younger users about the risks of COVID-19 and the benefits of a vaccination. The campaign reached a high point at the end of October in terms of audience reach and the Ministry, using its TikTok account handle Redacted continues to communicate using creator driven and animated content on the following issues:

- Basic safety and hygiene rules
- Debunking vaccine myths
- Long term health risks of COVID-19

- General information about the vaccines
- Information for pregnant women regarding the COVID-19 vaccination.



Redacted

- **Users' engagement data relating to pieces of content labelled as fact-checked and demoted**

Our quantitative statistics in the following section address user engagement by reporting on the three metrics below. The data covers:

- Total page views and user views of our Covid Center [page](#)
- Clicks and click-through-rate of our COVID-19 notice tag
- Clicks, impressions and click-through-rate of our COVID-19 vaccine tag

- Quantitative data for September and October 2021

Number of COVID-19 Notice Tag Videos					
Month	Italy	Spain	France	Germany	All EU
July 2020	8493	14518	7000	14195	N/a
August 2020	6899	15285	8752	10960	N/a
September	7903	17984	12175	9562	N/a
October	24172	20191	17166	19856	N/a
November	28974	17271	17599	30052	N/a
December Covid tag	13648	13458	7182	30033	N/a
December Covid + Vaccine tags	15723	13650	8554	30394	N/a
January 2021 Covid tag	8773	12484	4724	15326	81320

January 2021 Vaccine tag	996	119	1179	273	5087
February 2021 Covid tag	6,427	10,815	6,727	21,237	75,417
February 2021 Vaccine tag	586	236	1,070	449	3,714
March Covid tag	9019	5103	8505	28301	83498
March Vaccine tag	1967	349	2073	1108	7687
April Covid tag	3,889	3,948	6,489	26,574	59,206
April Vaccine tag	1,665	400	1,804	1,170	7,256
May Covid tag	1,889	2,015	2,657	13,086	28,414
May Vaccine tag	7,711	5,337	12,665	24,880	75,243
June Covid tag	200	216	181	628	2,011
June Vaccine tag	16,129	10,966	19,009	31,722	114,368

July Covid tag	119	187	323	387	1,661
July Vaccine tag	13,444	21,572	40,396	17,261	124,851
August Covid tag	96	126	130	379	1,261
August Vaccine tag	17,446	19,147	34,122	26,469	130,892
September Covid tag	717	655	497	2,212	6,818
September Vaccine tag	14,468	8,953	15,028	24,419	95,411
October Covid tag	974	988	600	2,578	9,948
October Vaccine tag	12,420	5,881	11,283	18,598	90,156

Number of violation videos with the term “Coronavirus” or “Covid” [videos removed]

Month	Italy	Spain	France	Germany	All EU
July 2020	88	133	79	49	N/a
August 2020	108	133	122	68	N/a
September	158	162	159	62	N/a
October	464	205	319	124	N/a
November	504	250	436	195	N/a
December	303	176	233	227	N/a
January 2021	1597	294	301	229	3303
February 2021	444	204	390	177	1,744
March	431	177	353	247	1,941
April	188	131	324	235	1,455

May	182	93	309	225	1,211
June	146	97	227	113	1,012
July	150	152	252	84	949
August	134	239	327	47	1,082
September	111	59	131	92	686
October	83	27	93	45	584

Number of Medical Misinformation videos [videos removed]					
Month	Italy	Spain	France	Germany	All EU
July 2020	30	42	29	47	N/a
August 2020	30	62	40	90	N/a

September	51	54	42	54	N/a
October	68	30	45	126	N/a
November	87	66	125	123	N/a
December	93	48	153	318	N/a
January 2021	106	112	135	204	1093
February 2021	42	77	36	145	502
March	176	104	78	348	952
April	67	102	45	354	659
May	186	165	69	290	761
June	241	396	139	216	1,014
July	963	472	526	1,158	3,225
August	1,262	512	580	440	2,890

September	919	276	648	1,099	3,620
October	579	164	694	768	3,074

Month	Page views and User views to COVID Center Page								All EU			
	Italy		Spain		France		Germany					
	Page views	User views	Page views	User views	Page views	User views	Page views	User views				
November	11,889,402	3,478,128	10,111,645	3,157,383	11,192,351	3,885,335	12,832,088	3,889,747	N/a	N/a		
December	12,987,902	3,751,850	12,021,548	3,538,851	12,826,496	4,283,639	14,699,067	4,187,670	N/a	N/a		

January 2021	12,032,469	3,552,129	11,547,519	3,452,627	10,607,004	3,910,213	15,345,277	4,237,649	77,963,191	23,352,565
February 2021	9,407,783	3,100,945	10,004,183	3,255,076	12,462,360	4,250,324	14,303,179	4,170,277	73,530,451	22,922,893
March	11,799,105	3,479,286	10,367,535	3,395,060	12,602,113	4,360,621	14,634,580	4,229,470	77,846,669	23,824,849
April	10,537,900	3,303,587	8,776,391	3,089,072	13,374,334	4,386,945	13,579,192	4,120,285	71,799,213	22,818,071
May	9,083,451	3,040,820	7,622,431	2,908,473	9,671,102	3,852,487	11,270,081	3,838,651	58,763,973	20,936,347
June	27,412	24,191	21,142	17,690	97,575	87,073	11,553	9,930	206,023	181,255
July	12,110	10,677	11,920	10,647	346,842	280,609	3,472	2,989	402,131	329,440

August	8,647	7,627	7,848	6,789	239,977	187,340	2,051	1,718	277,574	220,031
September	8,445	7,477	5,719	5,149	108,826	88,723	1,121	985	141,650	118,200
October	8,634	7,571	6,406	5,750	68,608	59,600	1,081	944	109,312	95,830

Clicks, Impressions and CTR to COVID notice tag

Mth	Italy			Spain			France			Germany			All EU		
	clicks	impressions	CTR	clicks	impressions	CTR	clicks	impressions	CTR	clicks	impressions	CTR	Clicks	impressions	CTR
Nov	797,870	8,986,411	8.2%	354,373	7,879,692	4.2%	352,793	10,681,721	3.3%	1,042,228	11,208,814	9.3%	N/a	N/a	N/a
Dec	484309	9077936	5.3%	316504	8256250	3.8%	146971	9916587	1.5%	717058	11429793	6.3%	N/a	N/a	N/a
Jan 2021	399896	342297721	0.117%	356298	296584154	0.120%	93314	71955692	0.130%	315227	298125201	0.106%	2038462	1771264999	0.115%

Feb 2021	261,634	231,574,005	0.113%	289,859	249,191,200	0.116%	62,548	47,152,440	0.133%	159,389	152,445,895	0.105%	1,362,644	1,221,033,283	0.112%
March	298,951	278,466,918	0.107%	101,331	77,618,369	0.131%	60,095	41,094,985	0.146%	203,172	165,680,827	0.123%	1,139,438	928,759,285	0.123%
April	102,104	825,106,21	0.124%	71,699	54,358,256	0.132%	53,981	37,666,032	0.143%	179,874	169,257,505	0.106%	660,565	533,801,834	0.124%
May	61,652	37,013,314	0.167%	33,454	25,594,385	0.131%	29,401	21,547,028	0.136%	113,952	104,177,057	0.109%	395,180	297,185,302	0.133%
June	24,267	18,817,786	0.129%	10,925	8,630,486	0.127%	11,114	8,187,913	0.136%	29,792	28,478,725	0.105%	133,261	105,097,047	0.127%
July	13,436	9,693,499	0.139%	11,242	8,106,785	0.139%	10,864	7,929,916	0.137%	19,891	17,688,608	0.112%	103,961	76,762,175	0.135%
August	10,740	7,175,045	0.150%	7,553	5,035,324	0.150%	7,553	5,043,096	0.150%	12,444	10,485,112	0.119%	75,825	52,814,586	0.144%
September	12,033	8,132,178	0.148%	7,638	5,398,038	0.141%	8,729	4,592,275	0.190%	23,758	18,697,097	0.127%	91,487	64,542,609	0.142%
October	13,569	8,578,994	0.158%	10,490	6,680,466	0.157%	18,214	7,501,872	0.243%	31,840	19,306,537	0.165%	130,300	79,684,519	0.164%

Clicks, Impressions and CTR to COVID Vaccine notice tag

Mth	Italy			Spain			France			Germany			All EU		
	clicks	impressions	CTR	clicks	impressions	CTR	clicks	impressions	CTR	clicks	impressions	CTR	clicks	impressions	CTR
Nov	797,870	8,986,411	8.2%	354,373	7,879,692	4.2%	352,793	10,681,721	3.3%	1,042,228	11,208,814	9.3%	N/a	N/a	N/a
Dec	484309	9,077,936	5.3%	316504	8,256,250	3.8%	146971	9,916,587	1.5%	717058	11,429,793	6.3%	N/a	N/a	N/a
Jan 2021	6,685	500,3625	0.134%	1,359	118,2274	0.115%	8425	66,865,45	0.126%	3594	374,5095	0.096%	30701	411,24694	0.075%
Feb 2021	3,261	2,382,258	0.137%	962	767,516	0.125%	6,743	4,178,463	0.161%	3,304	4,800,220	0.069%	20,628	28,005,451	0.074%
March	11,440	7,364,437	0.155%	3,985	3,175,432	0.125%	20,298	13,219,407	0.154%	10,833	11,797,084	0.092%	57,576	61,304,597	0.094%
April	22507	13,445,722	0.167%	8,692	6,283,994	0.138%	16,836	13,054,748	0.129%	13,605	16,235,621	0.084%	77,855	91,890,508	0.085%
May	68077	37,148,029	0.183%	29,364	23,161,057	0.127%	63,254	54,200,804	0.117%	118,285	105,747,111	0.112%	344,598	337,512,772	0.102%
June	141,956	87,310,247	0.163%	83,153	60,577,668	0.137%	104,806	85,673,401	0.122%	205,287	185,548,091	0.111%	656,772	667,855,635	0.098%

July	193,955	112,913,356	0.172%	176,018	119,843,583	0.147%	299,921	233,458,580	0.128%	156,283	145,331,505	0.108%	970,194	891,309,697	0.109%
August	261,333	146,785,238	0.178%	212,864	126,474,624	0.168%	372,059	286,292,357	0.130%	315,503	280,064,961	0.113%	1,333,721	1,189,986,263	0.112%
Sept.	216,178	118,303,149	0.183%	107,198	71,213,912	0.151%	188,094	142,403,067	0.132%	262,346	238,911,467	0.110%	920,479	902,080,603	0.102%
October	147,646	83,942,319	0.176%	57,009	36,293,377	0.157%	94,755	79,462,728	0.119%	157,632	144,029,163	0.109%	546,527	665,845,319	0.082%

Exhibit 2

Hi [REDACTED] - we won't know cadence and expected outputs before some time closer to first meeting when we have a sense of proposed terms of reference.

Structure is like all other CoP working groups - we participate as part of the EU CoP permanent taskforce; other members across industry, civil society, fact-checkers can join as well; co-chairs set the agenda under (strong) impetus from the EU Commission; decision is taken by "consensus" -- but consensus can be heavily pressed by the EC if they disagree with where it's going.

Others keep me honest if I'm misrepresenting.

On Thu, Jun 22, 2023 at 12:06 PM [REDACTED] <[REDACTED]@google.com> wrote:

Thanks [REDACTED] Agree would be great to both participate, and co-chair. What is the structure and cadence of this? And what are the intended outputs?

On Thu, Jun 22, 2023 at 10:02 AM [REDACTED] <[REDACTED]@google.com> wrote:

[REDACTED] as just flagged in GAI GAPP WG re code of practice on disinfo and new WG on genAI

On Thu, Jun 22, 2023 at 3:46 PM [REDACTED] <[REDACTED]@google.com> wrote:

yes support the co chair

On Thu, Jun 22, 2023 at 3:45 PM [REDACTED] <[REDACTED]@google.com> wrote:

Agree. Should be a good opportunity for us, particularly as Google wants to lead on provenance/watermarking (and helpfully, [] & [] are a part of our company WG on those topics).

On Thu, Jun 22, 2023 at 2:20 PM [REDACTED] <[REDACTED]@google.com> wrote:

Concur on co-chair to best align our interests.

On Thu, Jun 22, 2023 at 6:14 AM [REDACTED] <[REDACTED]@google.com> wrote:

IMO we should, alongside [REDACTED] / MSFT - who didn't waste one second.

On Thu, Jun 22, 2023, 09:03 [REDACTED] <[REDACTED]@google.com> wrote:

See below - the EC is opening the GAI subgroup under the Code of Practice. I assume we want to join (we don't really have a choice), but do we also want to co-chair it?

Thanks for your thoughts.



----- Forwarded message -----

From: CNECT-COP-TASK-FORCE@ec.europa.eu <CNECT-COP-TASK-FORCE@ec.europa.eu>
Date: Thu, Jun 22, 2023 at 2:57 PM
Subject: Call of interest for the Generative AI Subgroup
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Dear Members of the Task-force,

At the last Plenary Meeting Vice-President Jourová asked the Task-force to look into the challenges posed by the generative AI. Given the role of the Task-force in evolving and adapting the Code in view of the technological developments, we would like to propose you to **open a new subgroup on Generative AI** to tackle this complex new challenge.

Could you please let us know if you are interested in joining this subgroup and also if you have interest in co-chairing it, by **16 July 2023**?

The subgroup would start its activities in September.

Kind regards,

The CoP Disinfo Team

--

- [REDACTED]
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Google

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Google

- [REDACTED]
- Head of Information Quality Strategy

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Exhibit 3



Digital Services Act

Readiness overview for the European Commission

17 July 2023

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Agenda

12:00 - 12:20	Welcome & Introductions Redacted
12:20 - 12:40	Trust and Safety at TikTok Redacted
12:40 - 13:10	Our DSA Programme Redacted
13:10 - 13:30	Working Lunch
13:30 - 14:00	Compliance Function and Audit Redacted
14:00 - 15:00	Content Moderation Various speakers
15:00 - 15:15	Break
15:15 - 15:45	Data Access and Transparency Various speakers
15:45 - 16:15	Advertising and Commercial Content Various speakers
16:15 - 16:45	Recommender System Redacted
16:45 - 17:00	Break
17:00 - 18:00	Minor Safety Various speakers
18:00 - 18:30	Q&A and Close

Welcome & Intros

Redacted

Our aims for today

Explain our plan

Demonstrate our commitment

Listen to your feedback

Learn about your priorities

Up next:
Trust and Safety at
TikTok

Trust and Safety at TikTok

Redacted

Trust & Safety's commitment to DSA

Trust and
Safety

Online
Safety
Oversight
Committee

TikTok
Ireland
Board

Product, Policy, Operations and
Project management teams



Protecting our users

We want TikTok to be a place where everyone can authentically express themselves



Policies & Controls



Technology & People

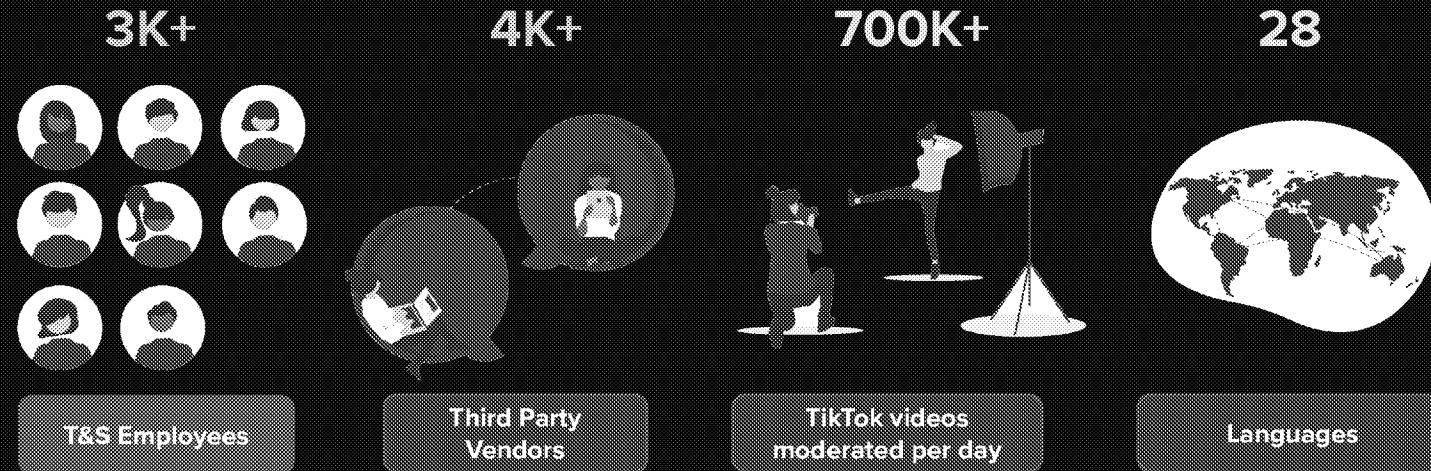


Cultural Adaptation & Customisation



Focus on Minor & Teen Safety

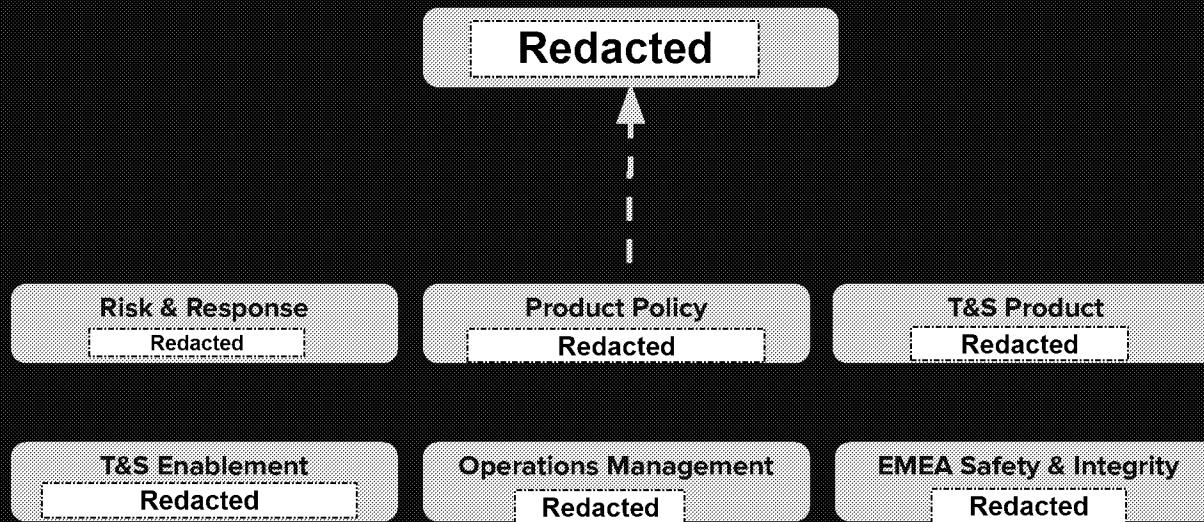
Trust and Safety around the region in numbers



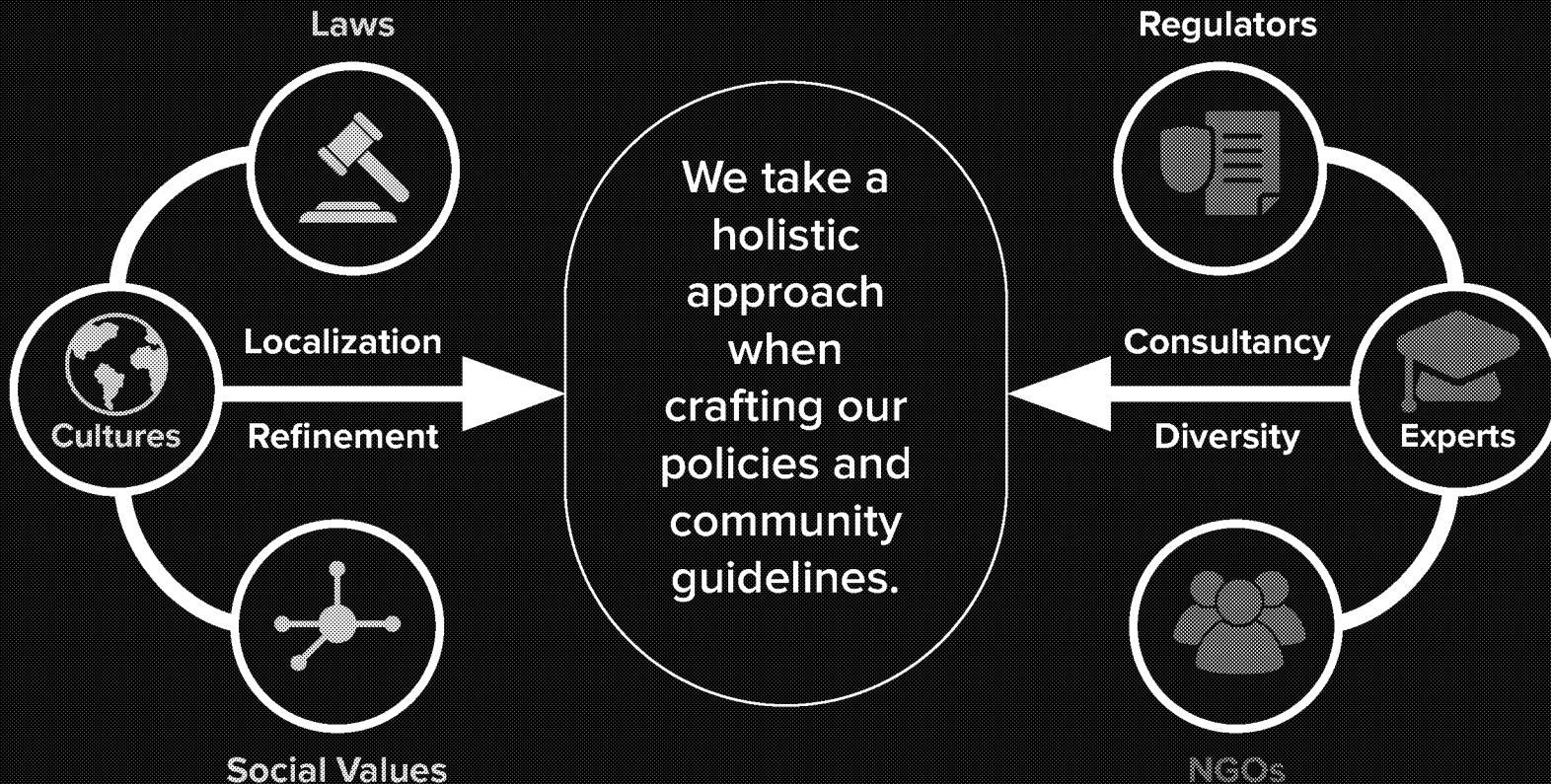
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Trust & Safety organisation



Community Guidelines & Policies





Practices

Moderation

Technology + People



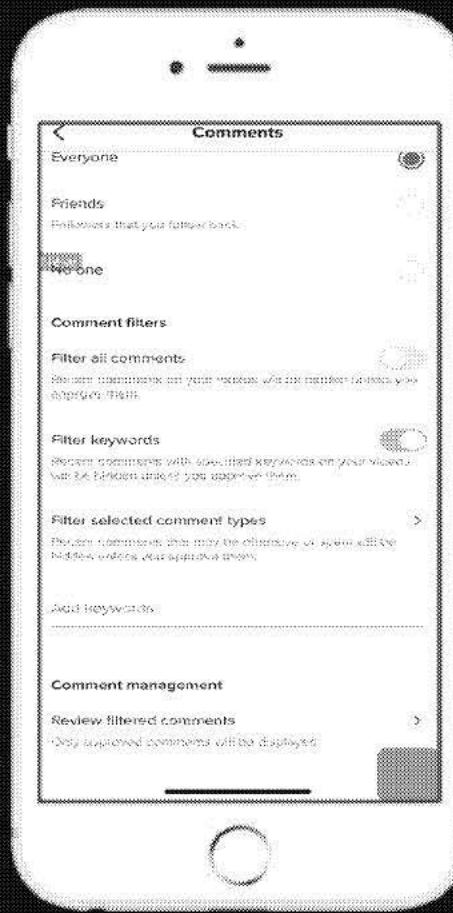
We have put protective measures in place that combine innovative content moderation technology with a robust human moderation team to proactively enforce our Community Guidelines, and to respond to user reports.



- AI for scale: Technology is a key part of effectively enforcing our policies, and our systems are developed to automatically flag certain types of content that may violate our Community Guidelines.
- For example, object detection models flag things like weapons or hate symbols to our human moderators for further review or auto remove when signals are extremely clear.
- We operate around-the-clock moderation covering wide range of languages and dialects.
- Virality checks happen throughout the contents journey so we can check whether content is appropriate for wider consumption

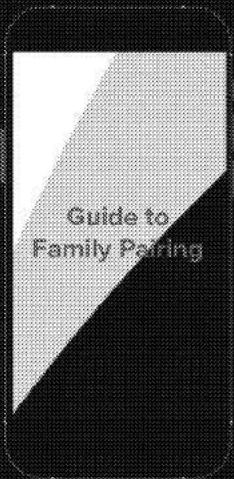
T&S Safety by Design

We have designed our content moderation systems with safety in mind. However, we appreciate that users will also want to be further empowered. We offer safety tools for all users and additional tools for parents and teens



Recent Trust and Safety Highlights

Family Pairing & TikTok's Youth Council



Product

Option to start fresh on TikTok



Product

Refreshed Community Guidelines

Community guidelines



Policies

How effective is our enforcement?

Our safety efforts reflect the positivity of our community's content - with videos removed for violation currently accounting for less than 1% of all videos uploaded on TikTok.

93%

of violating videos removed
before they were reported

87.9%

of violating videos removed
within the first 24 hours

Redacted

You have just heard: Trust and Safety at TikTok

Up next: DSA Programme

Our DSA Programme

Redacted

DSA: TikTok's Compliance Principles

Delivery

Compliance

Accountability

Our Commitment

The DSA touches on every corner of TikTok. This has resulted in a **truly pan-company compliance effort**. Our CEO, Shou Chew, assigned the project **PO status** in July 2022. Since then, we have dedication of many thousands of hours time and resource to the project.

Today, we will showcase TikTok's DSA compliance programme on a good faith basis and trust that you will agree that our efforts **rise to the challenge** set by the DSA.

Deliverables

250

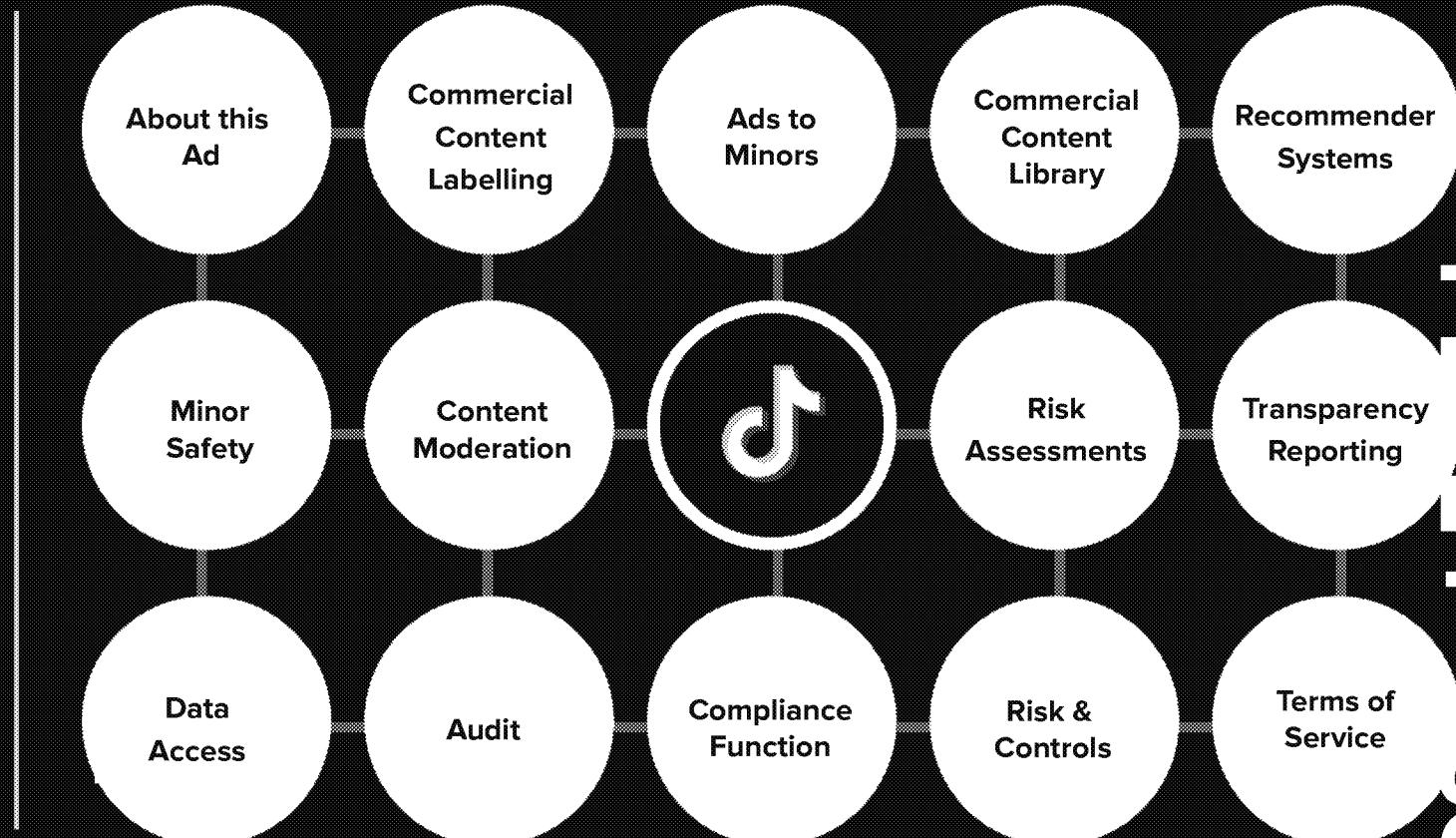
Teams

c.80

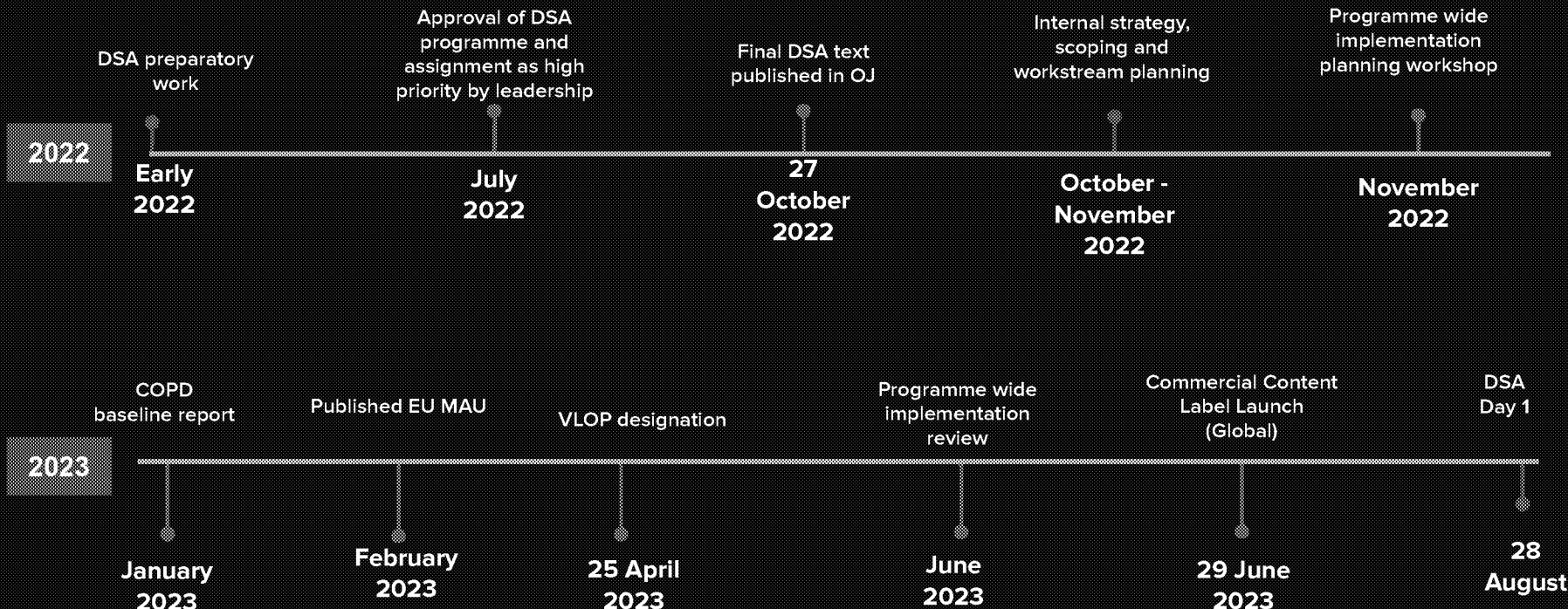
People

1,000+

DSA at TikTok

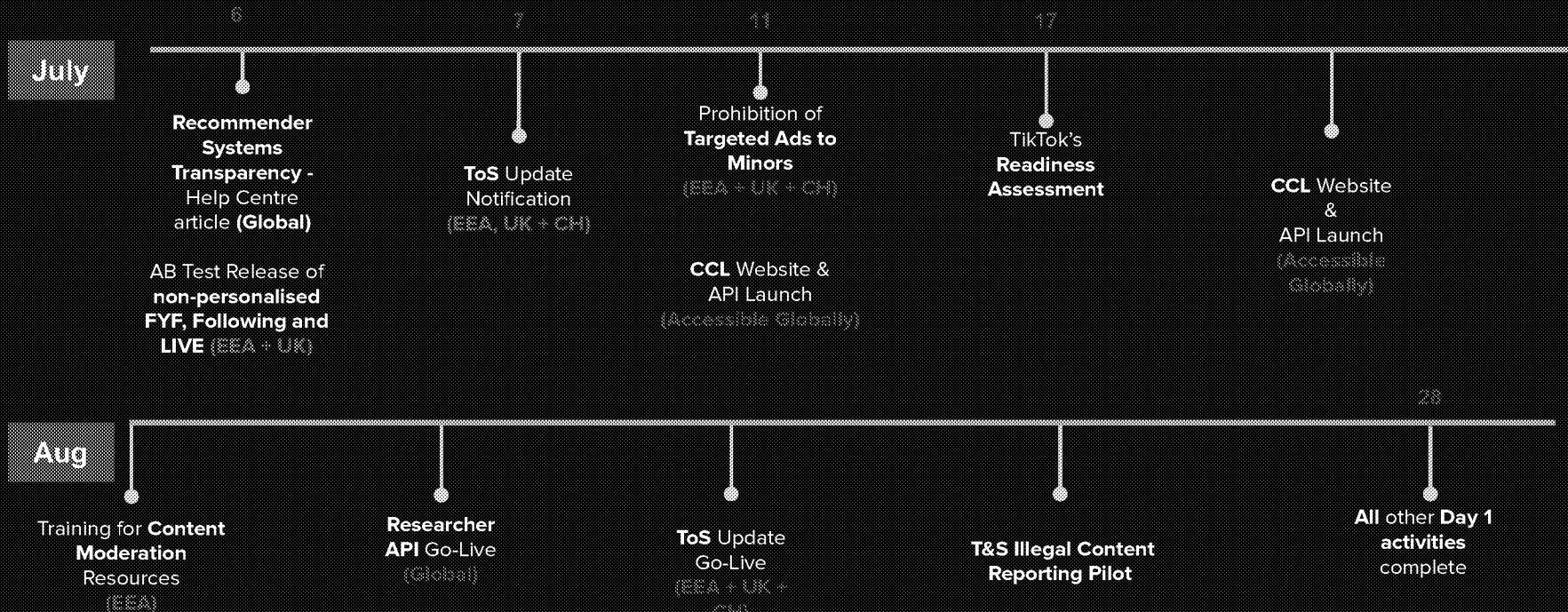


DSA Implementation Planning and Strategy



7 Weeks to Day 1

Pre-July launches: About this Ad (August 2022 -Global);
Commercial Content Label (June 2023 - Global)



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Current Programme RAG Status

DSA: Implementation (1/4)

Workstream	Progress Updates	Overall Status
Content Moderation	<p>Illegal Content Reporting (on track): - We are aiming to test our UGC content reporting in Ireland, Luxembourg and Austria in mid-August and the full solution will go live on Day 1.</p> <p>Statement of Reasons (SORs) & Appeals (on track): - We are confident the core moderation actions will be ready for Day 1. - Post-Day 1 we will review ancillary moderation actions to ensure these are all captured. - We have received guidance on the EC SOR database. Will respond to consultation and engagement outreach.</p> <p>Risk & Response (on track): - We are commencing the product design phase for trusted flaggers. - LERT and Incident Management teams are transitioning to our new illegal content moderation platform to handle Law Enforcement Data Requests and Government take-down requests.</p> <p>Moderation Operations (on track): - We are close to finalising moderation policies and the escalation process. - We are targeting end of July/start of August moderator for training.</p>	In Progress

DSA: Implementation (2/4)

Workstream	Progress Updates	Overall Status
Commercial Content	<p>Commercial Content Labelling (on track):</p> <ul style="list-style-type: none">- We launched the Commercial Content labelling toggle on 29 June 2023. <p>Commercial Content Library (CCL) (on track):</p> <ul style="list-style-type: none">- Scheduled to be launched on 20 July 2023. Positive feedback from initial beta testing with external testers (privacy groups, universities etc.)	In Progress
Recommender Systems	<p>Recommender Systems - optionality (on track):</p> <ul style="list-style-type: none">- We released an AB test of our non-personalised content feeds: For You, Following and Live on 6 July 2023. <p>Recommender Systems Transparency (on track):</p> <ul style="list-style-type: none">- Updated Help Centre article (in English) went live on 7 July 2023.- Aiming to translate into all other relevant EU languages by Day 1.	In Progress
Audit	<ul style="list-style-type: none">- Previously on-track, but prudently reflected as amber whilst the Delegated Act remains in draft.- Working with Deloitte to develop a Risk Control Matrix (RCM) to facilitate the compliance audit.- Finalising the engagement of our selected auditor.	In Progress

DSA: Implementation (3/4)

Workstream	Progress Updates	Overall Status
Transparency and Data Access	<p>Transparency (on track):</p> <ul style="list-style-type: none">- Transparency reporting: building an aggregated warehouse dashboard to streamline collation- MAU reporting: we are working with the data science team and Internal Audit to finalise next publication- DSA Transparency Hub: we are building a dedicated DSA transparency hub to showcase our DSA compliance and to house our transparency reports. <p>Data Access (on track):</p> <ul style="list-style-type: none">- Research API: Rolling out our Research API across the EU in August.- Vetted Researchers: participating in an EDMO pilot for sharing data with vetted researchers.	In Progress
Minor Safety	<p>Minor Safety Risk Assessment:</p> <ul style="list-style-type: none">- Risk assessment progressing to review by the RARG - the risk assessment will effectively record various minor safety measures employed by TikTok which align with the obligation under Art. 28(1)- Currently prudently reflected as 'amber' due to uncertainty around what will be considered 'compliance' with Art. 28(1), given the broad/high-level nature of the obligation. Assessing bolstering of internal governance to appropriately monitor the risk. <p>Prohibition of Ads to Minors (on track):</p> <ul style="list-style-type: none">- Prohibition of minor profiling and targeting for ads became effective on 11 July. 2023	In Progress

DSA: Implementation (4/4)

Workstream	Progress Updates	Overall Status
Platform Obligations	<p>Risk Assessments (on track):</p> <ul style="list-style-type: none">- All assessments progressing through the review and governance framework. <p>Terms of Service (ToS) (on track):</p> <ul style="list-style-type: none">- Users notified of update TOS on 7 July, and will be coming into effect on 7 August. <p>Compliance, Governance and Enforcement (on track):</p> <ul style="list-style-type: none">- Our efforts to appoint a permanent Compliance Officer are ongoing - conducting final interviews.	In Progress
E-Commerce	<ul style="list-style-type: none">- EU launch of TikTok Shop on hold given other commercial priorities for that part of the business in other regions. Work will restart as and when we receive a new launch date.	On Hold

**You have just heard:
DSA Programme**

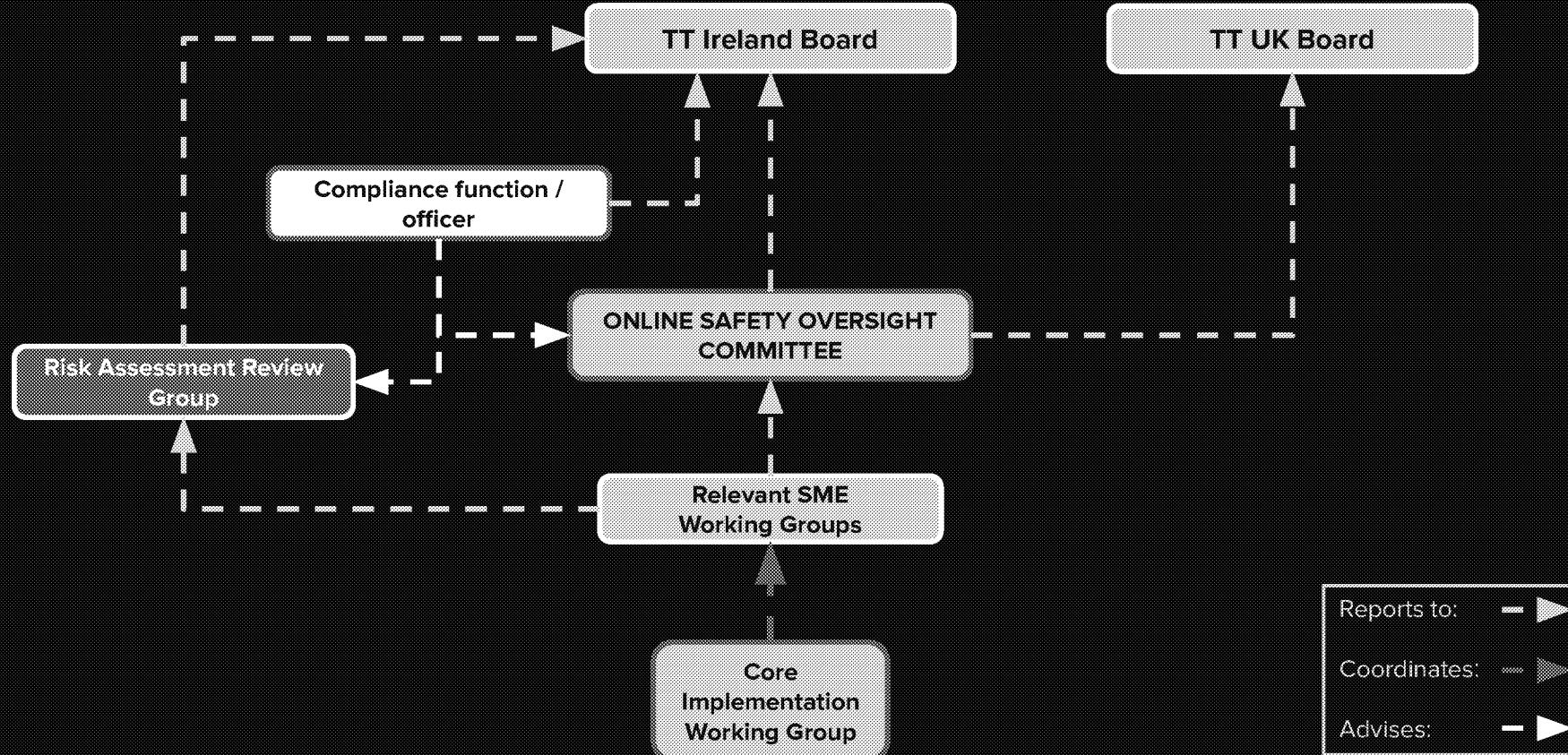
Up next, lunch and
then:
**Compliance Function
and Audit**

Lunch Break

Compliance Function and Audit

Redacted

Our overarching governance framework



From implementation to 3 LOD compliance

First line - Business & Operations

- 1. Frontline staff**
Business units with day-to-day activities overlapping the DSA, like Trust & Safety & Monetisation, are given new policies, rules & SOPs
- 2. Management**
Frontline leadership with responsibility will instill and monitor compliance with new compliance requirements
- 3. Risk, Safety & Integrity**
Oversight teams embedded across the business units will ensure rules & guidance from the Compliance Function are understood & implemented

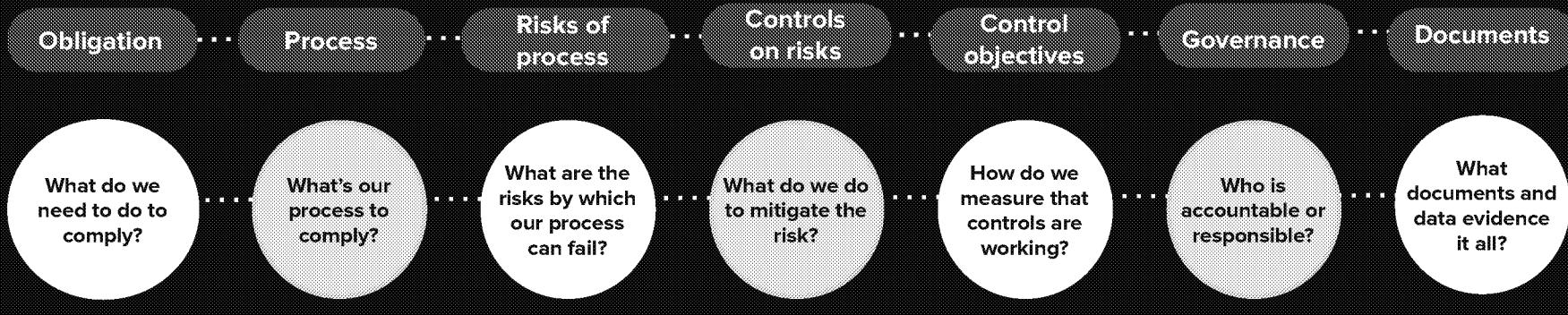
Second line - Compliance Function

- 1. Implementation**
Design and build of new policies, processes and features - critical foundations
- 2. Risk and Control Matrix**
Internal subject matter experts working with Deloitte to carefully document controls
- 3. Building a team**
We are pivoting from leveraging existing expertise to final phase org design for new headcount
- 4. Multi-year plan**
Planning for RCM completion, Risk Assessment work plans, monitoring and any remediation in Year 1. Multi-year plan to a more mature compliance posture

Third line - Audit

- 1. Internal Audit**
Engaged to review Risk Assessments and provide independent challenge
- 2. Auditor- appointment**
On 25 April 2023 TikTok Ireland Board has appointed in principle a Big 4 audit firm with multi-disciplinary capabilities
- 3. Auditor - engagement**
Live work on engagement letter taking the draft Delegated Act into account
- 4. Auditor- planning**
Working judiciously with our auditor to facilitate an effective and appropriate audit

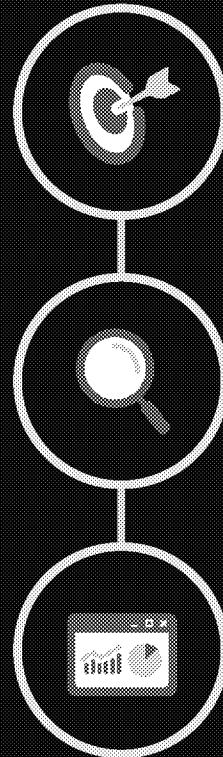
Risk Controls Matrix



Risk-focused prioritised and iterative process

Audit

We have carefully selected an auditor



RFP process & Board appointment

Scrutinising independence & competence

Understanding audit outcomes

Audit timeline



**You have just heard:
Compliance Function**

Up next: Content Moderation

Content Moderation

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Redacted

Redacted

Scope of our Content Moderation workstreams

TikTok will introduce **illegal content reporting mechanisms** for core content features and establish illegal content review processes.

Statement of reasons will be introduced as well as reporter and uploader **appeal processes**. We will also have robust processes to handle orders against illegal content and orders to provide information

Articles

- Notice & Action (16)
- Statement of Reasons (17)
- Internal complaints (20)
- Orders against illegal content (9)
- Orders to provide information (10)
- Notification of suspicions of criminal offences (18)
- Trusted Flaggers (22)
- Misuse (23)

Teams

6

Trust & Safety, Business Integrity, Legal, Product, GR & Comms

Deliverables

111

across dozens of working groups

People

200+

not counting moderation teams

Reach

30

EEA countries

Key features of our solution

Present for Day 1

- Illegal content reporting mechanism launched for core content features
- Illegal content review processes established
- Notifications and appeals enabled for core enforcement actions
- Robust processes to handle orders against illegal content and orders to provide information
- Established Trusted Flagger reporting channels

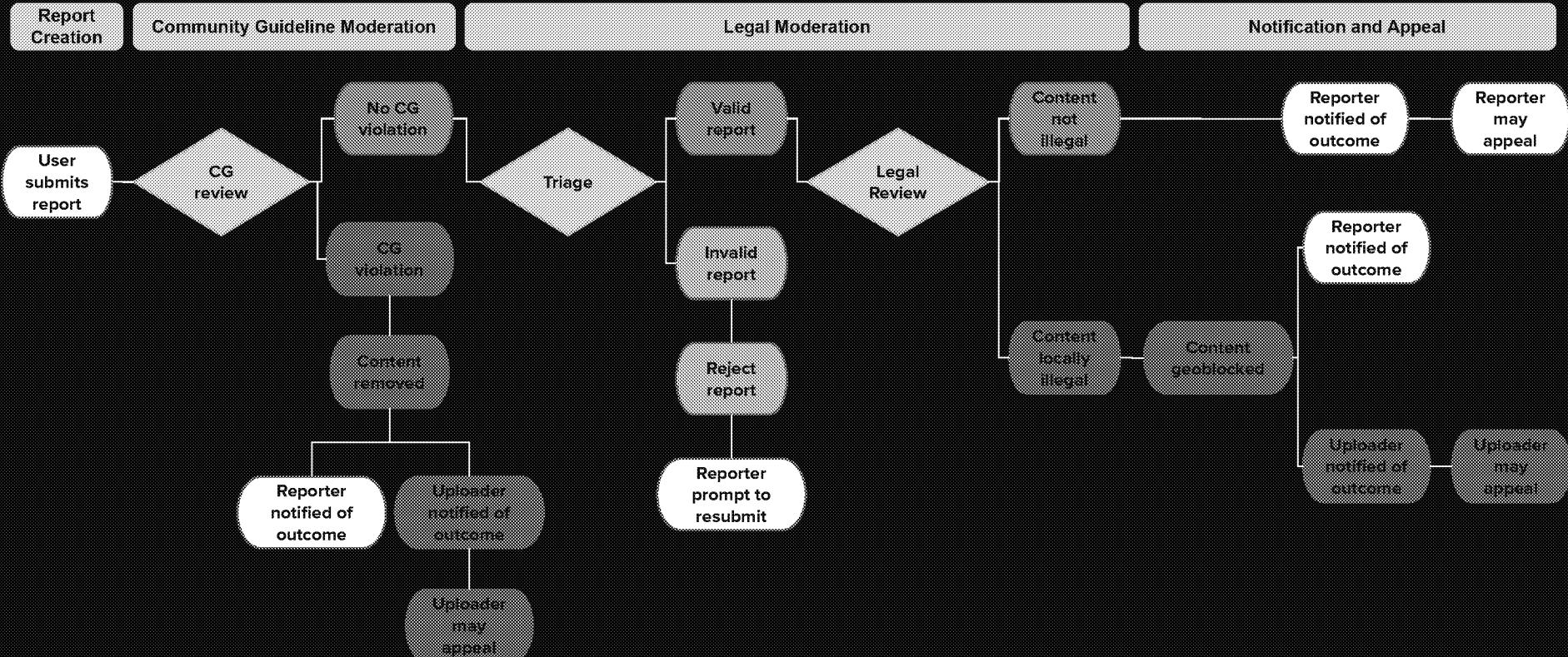
What is coming next

- Expand availability of illegal content reporting mechanism and extend scope of notifications and appeals to non-core features and enforcement actions
- Advancing illegal content moderation policies based on first experiences gained (e.g. quality assurance)
- Onboarding Trusted Flaggers (once designated)
- Transmission of decisions/statement of reasons to Commission database

Agenda

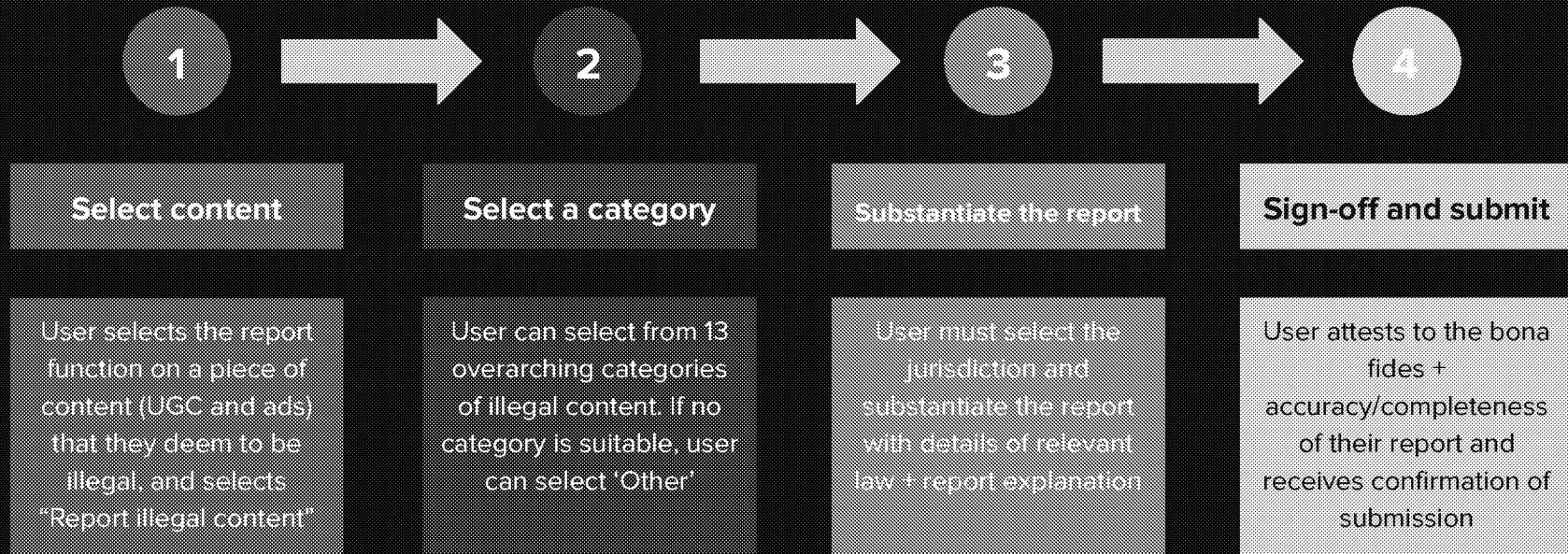
- **Illegal Content Reporting**
 - User journey (the “front-end”)
 - Moderating illegal content reports (the “back-end”)
- **Notifications & appeals**
 - Reporters
 - Uploaders
- **Illegal Content Moderation Team**

Content Journey



Illegal Content Reporting

Illegal Content Reporting - User Journey (the “front-end”)



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1

Reporter journey: selecting content and report category

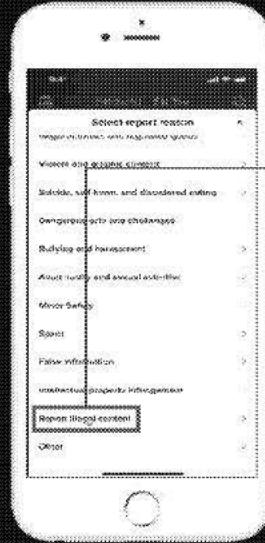
Select
content to
report

Redacted

1

Select
content to
report

Reporter journey: selecting content and report category



2

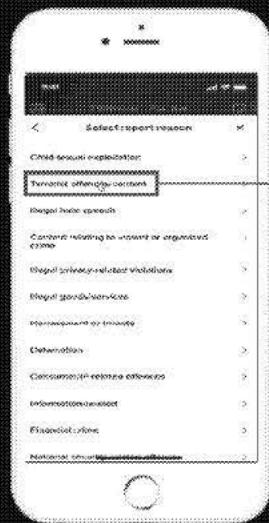
Report
Illegal
Content

Redacted

Reporter journey: selecting content and report category

1

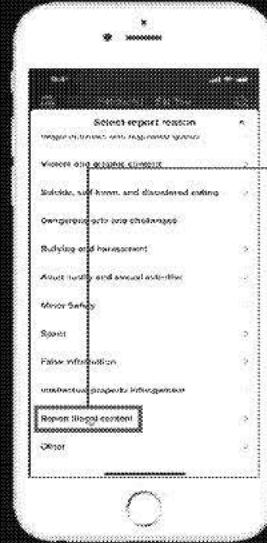
Select
content to
report



2

2

Report
Illegal
Content



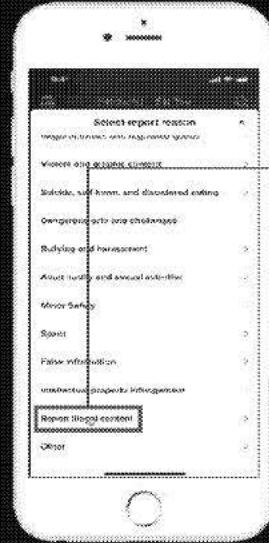
3

Select
Category

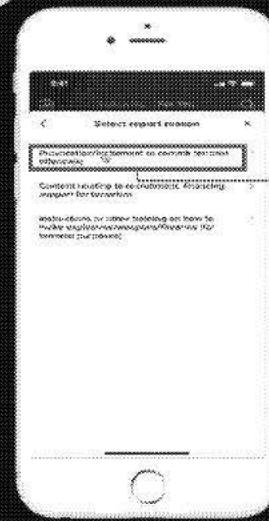
Redacted

1 Reporter journey: selecting content and report category

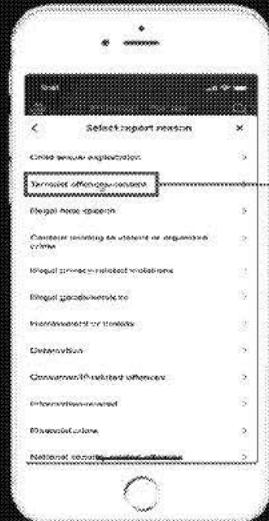
Select
content to
report



2
Report
Illegal
Content

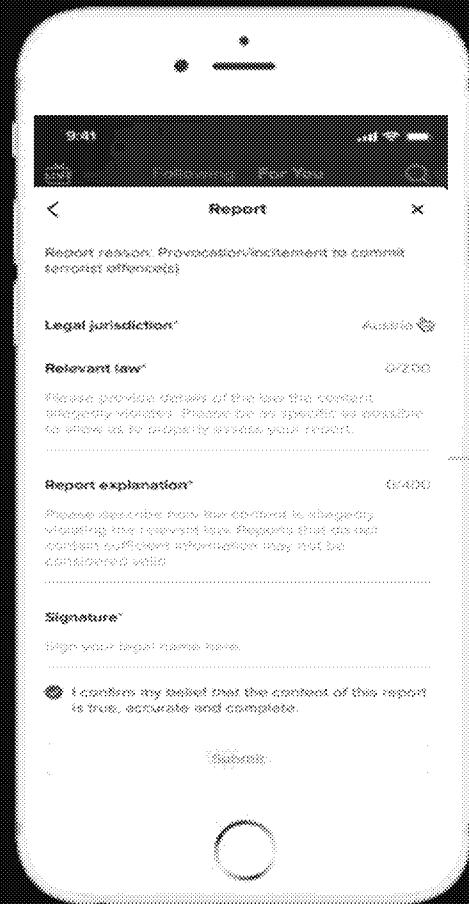


3
Select
Category



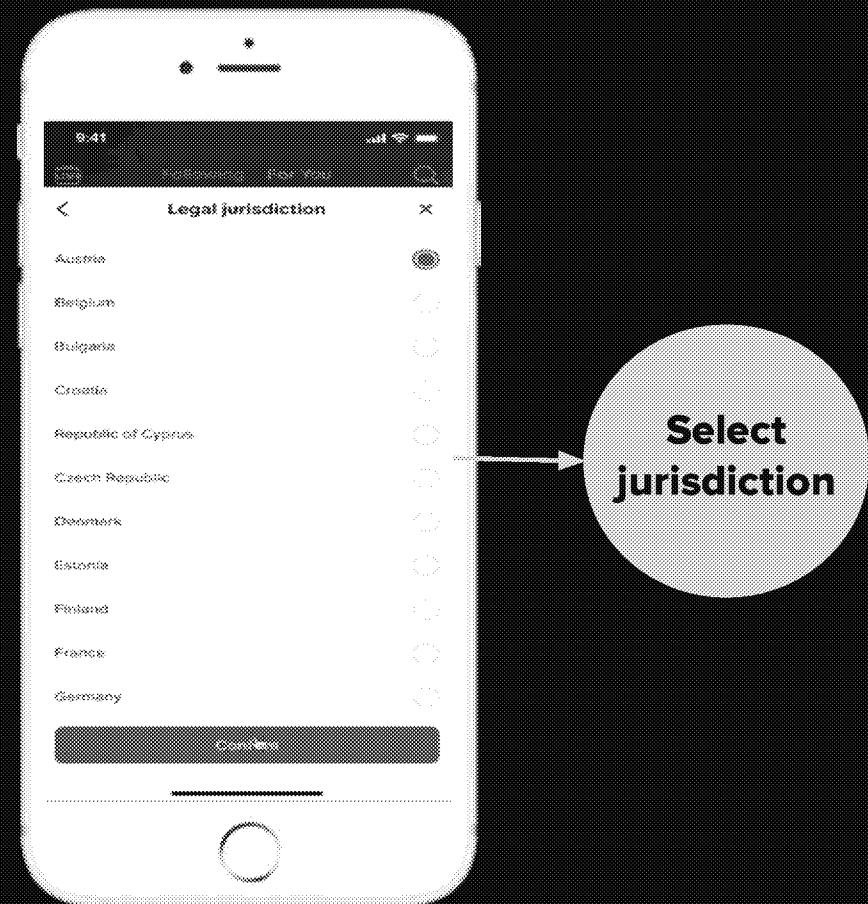
4
Select
sub-
category

Reporter journey: substantiating and submitting report

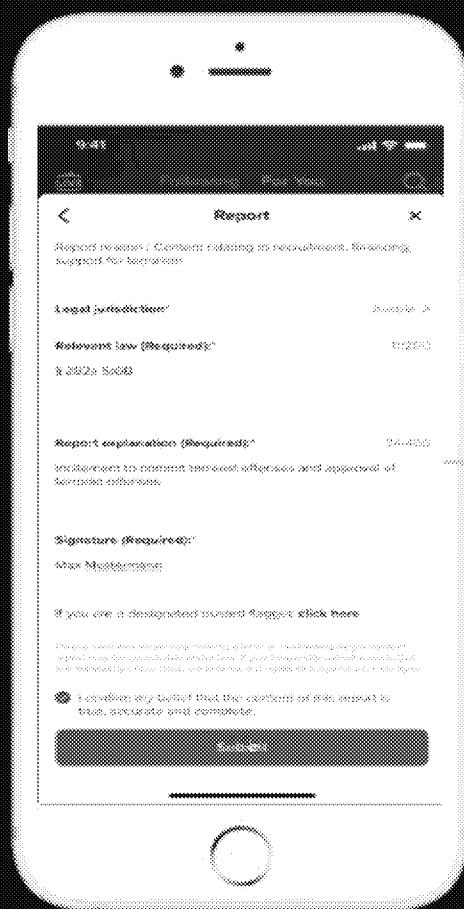


Report
detail
screen

Reporter journey: substantiating and submitting report

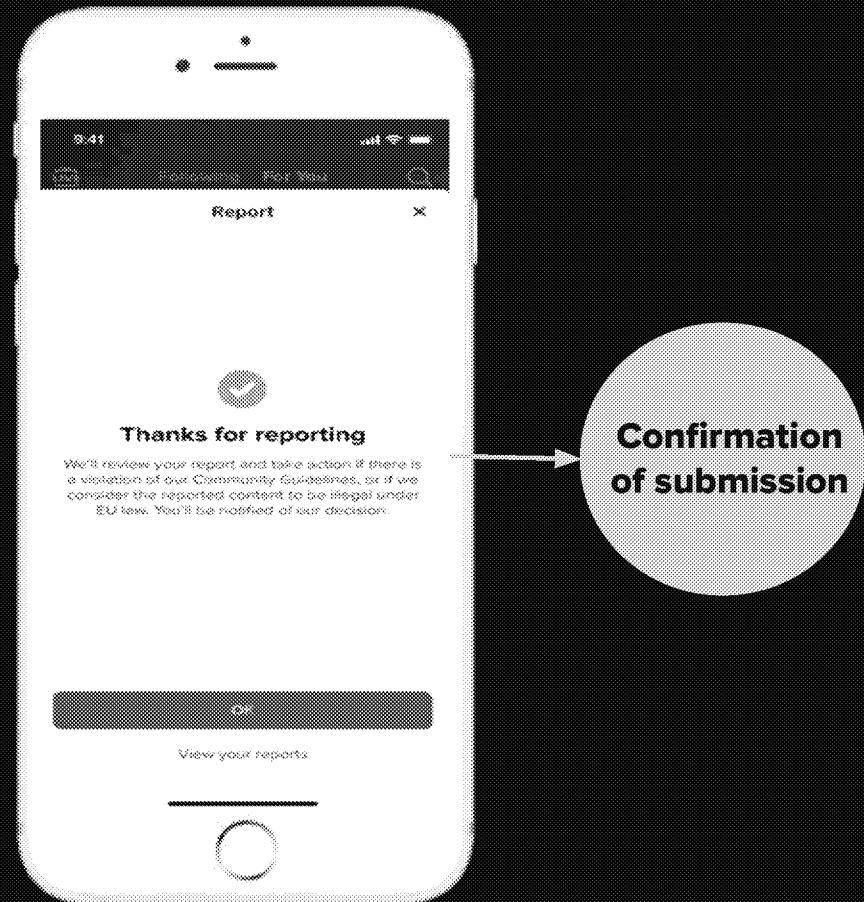


Reporter journey: substantiating and submitting report



**Substantiate
report and
sign-off**

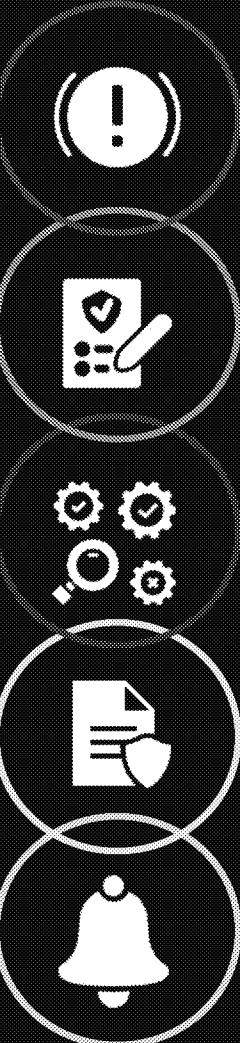
Reporter journey: substantiating and submitting report



Moderating illegal content reports

Illegal Content Reporting: Content Journey (the “back-end”)

- 1 Content is reported**
Once a user submits a report, an illegal content case is created and routed to the appropriate moderation teams
- 2 Community Guidelines Moderation**
Content is reviewed under Community Guidelines. Any content that is not removed will pass to the triage stage of Legal review
- 3 Triage**
Moderators review the information provided by the reporter and reject reports that are unfounded. Affected reporters are notified and can re-submit
- 4 Legal Moderation**
Admissible reports are reviewed under our legal policies (based on EU + local laws). Illegal content will be geo-blocked in the relevant territory
- 5 Action and Notification**
Decision is made whether to remove globally, locally or to maintain on platform. Reporter and uploader receive appropriate notification and appeal options



The Moderation Path

1

Specialist Illegal Content Moderator

Team of 144 moderators review valid illegal content reports against bespoke moderation policies for each category of illegality (e.g. terrorism, hate speech, defamation, CSAM etc.)

2

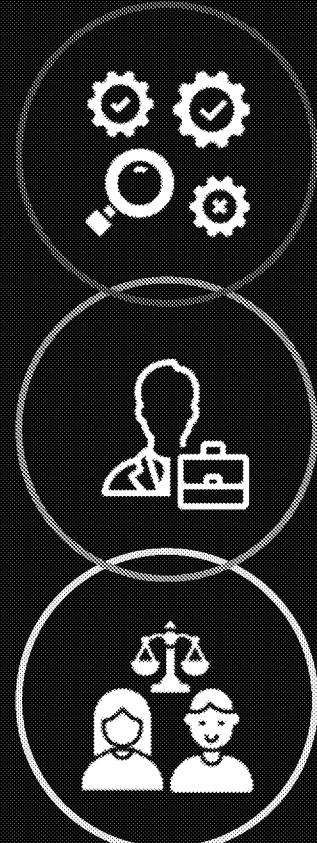
Paralegal Team

If a moderator is unable to come to a moderation decision based on the moderation policies, the report can be escalated to a specialist paralegal team, who will review, using their legal training and the content moderation policies

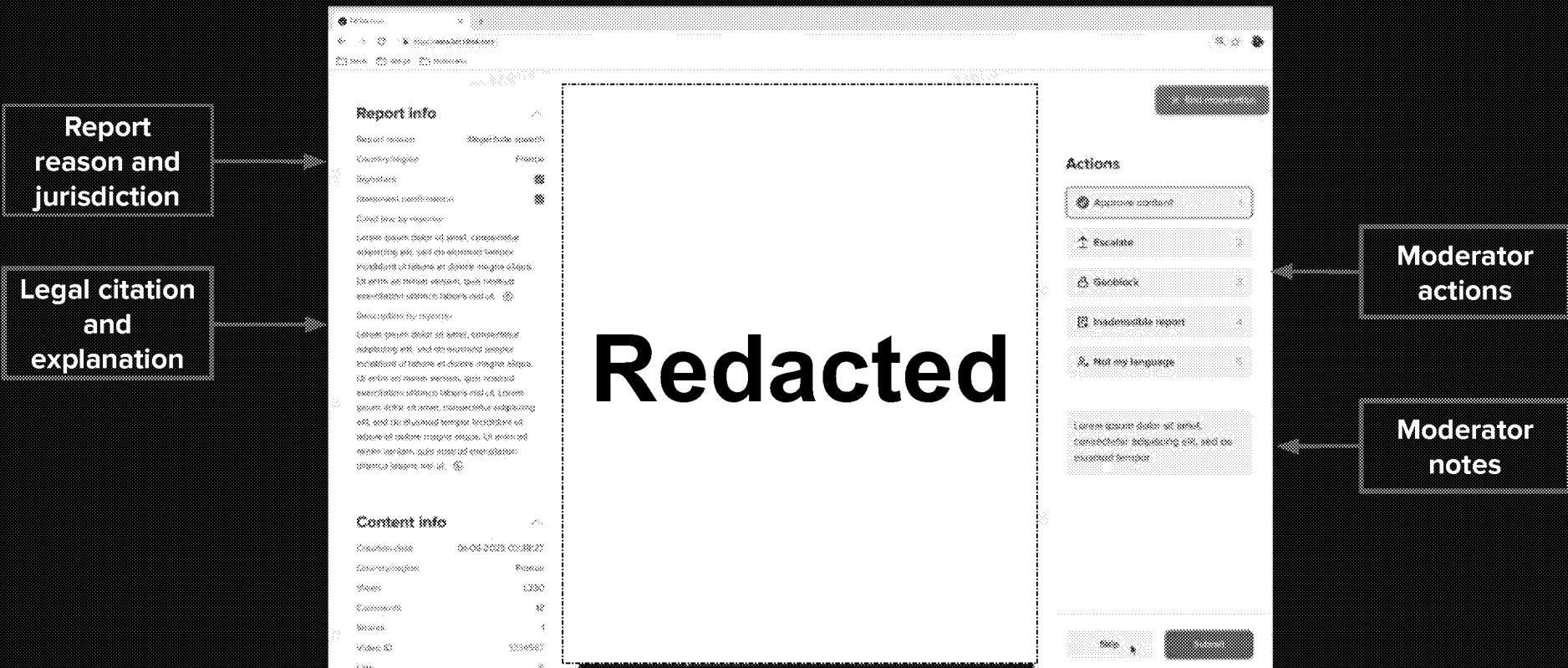
3

Lawyer Review

If a paralegal cannot come to a moderation decision, further escalations mechanisms are in place. To ensure comprehensive pan-region legal coverage, we are partnering with an law firm to help undertake such reviews



Legal moderation: insider view



Illegal Content Moderation Policies



- Framework policies** created by internal legal teams and external counsel with close input from our internal subject matter experts
- Adopted a practical and proportionate **risk-based approach**, building on learnings including under NetzDG and similar EU Member State laws
- The policies are **living documents**. They will evolve, and be refined, based on ongoing training and reporting data

Example: Terrorism Content Moderation Policy

Arts 4 to 11 of Directive (EU) 2017/541 have been distilled into **separate moderation criteria** in order to count as a violation:

- 1) connection to a terrorist or a terrorist group
- 2) content that depicts a range of behaviours such as (i) recruitment for terrorism, (ii) financial support for terrorism, (iii) public provocation etc.

Policy guidance includes aspects such as:

- Definitions of broad/vague legal terms
- Examples of conduct to assist decision makers;
- Potential categories of exceptions broadly based on free speech grounds;
- Escalation process and support for edge cases

Notifications and Appeals - Reporters

Closing the loop: notifications and appeals

Reporters notifications and appeals:

- ◆ Reporters will receive notification of the **outcome of the moderation process** (such as no action, removal for violation of the Community Guidelines, geoblock for violation of local law, or rejection for unfounded or unsubstantiated reporting)
- ◆ Where content is not removed, the reporter will have the opportunity to **appeal** and provide further detail to their original report
- ◆ Where a report is rejected as unfounded or substantiated, the reporter will have the opportunity to **re-submit the report**

Reporter notifications and appeals: content restricted

Redacted

→ Video removed

→ Video restricted

→ No violations

**Reporter notifications
and appeals:
content restricted**

► Video geoblocked

Redacted

**Reporter notifications
and appeals:
illegal content report
rejected as inadmissible**

Redacted

Notification
of outcome

**Reporter notifications
and appeals:
illegal content report
rejected as inadmissible**

Redacted

Option to
appeal

**Reporter notifications
and appeals:
illegal content report
rejected as inadmissible**

Redacted

Option to
re-submit
report

**Reporter notifications
and appeals:
illegal content report
rejected as inadmissible**

Redacted

Confirmation
of report

**Reporter notifications
and appeals:
no violation found**

Redacted

**Notification
of
outcome**

**Reporter notifications
and appeals:
no violation found**

Redacted

**Appeal
submission**

**Reporter notifications
and appeals:
no violation found**

Redacted

**Successful
appeal**

**Reporter notifications
and appeals:
no violation found**

Redacted

Unsuccessful
appeal

Notifications and Appeals - Uploaders

Closing the loop: notifications and appeals

Uploaders notifications and appeals:

- ◆ Content uploaders will be notified when their content is restricted, be it for violation of the Community Guidelines or local laws
- ◆ They will receive a **Statement of Reasons** (as per Article 17) outlining the scope, duration and reason for restriction, the facts and circumstances underlying the restriction, detection and, where applicable, automation methods used in moderation
- ◆ Uploaders will be able to **appeal** content and account-level restrictions and receive instructions on how to do so via the Statement of Reasons

Uploader notifications and appeals: **content found to be illegal**

Redacted

Statement of
reasons &
appeal
options

Uploader notifications and appeals: **content** **found to be illegal**

Redacted

Appeal
submission

Uploader notifications and appeals: **content found to be illegal**

Redacted

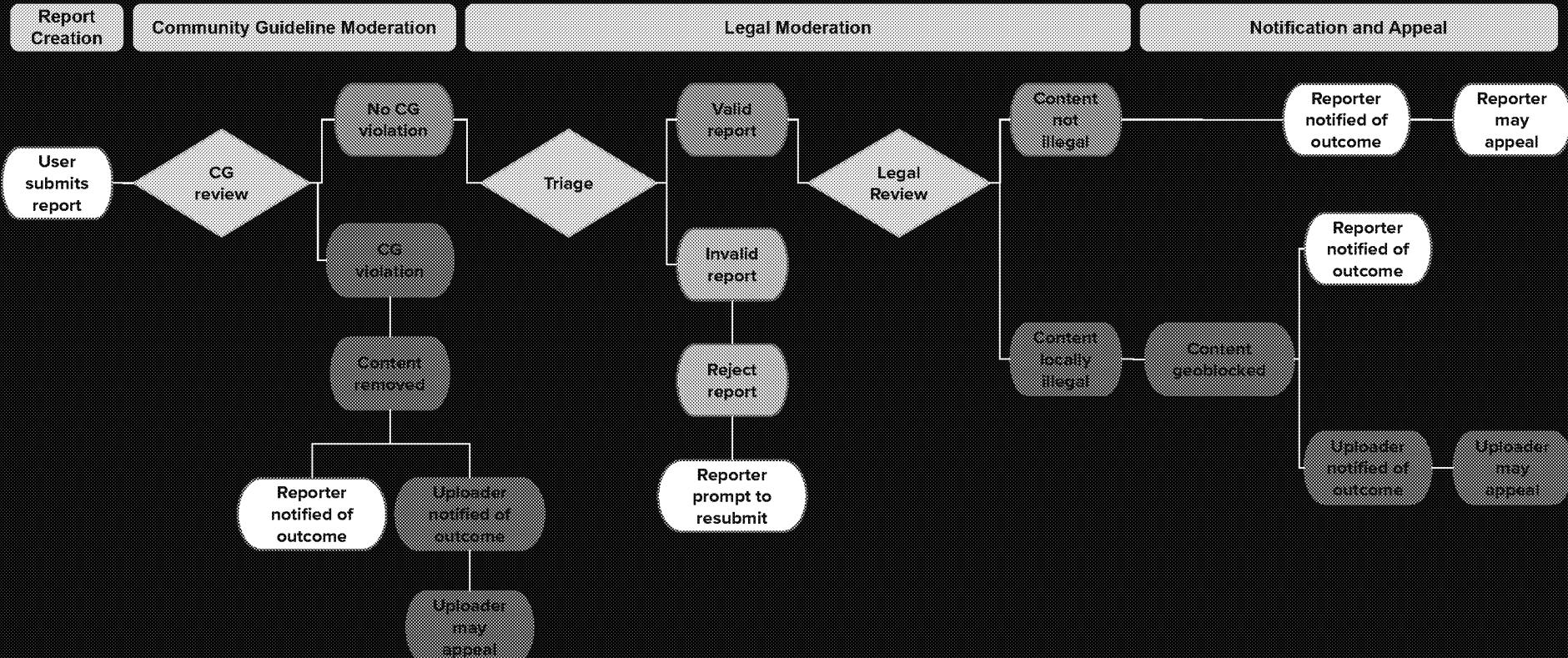
Successful
appeal

Uploader notifications and appeals: **content found to be illegal**

Redacted

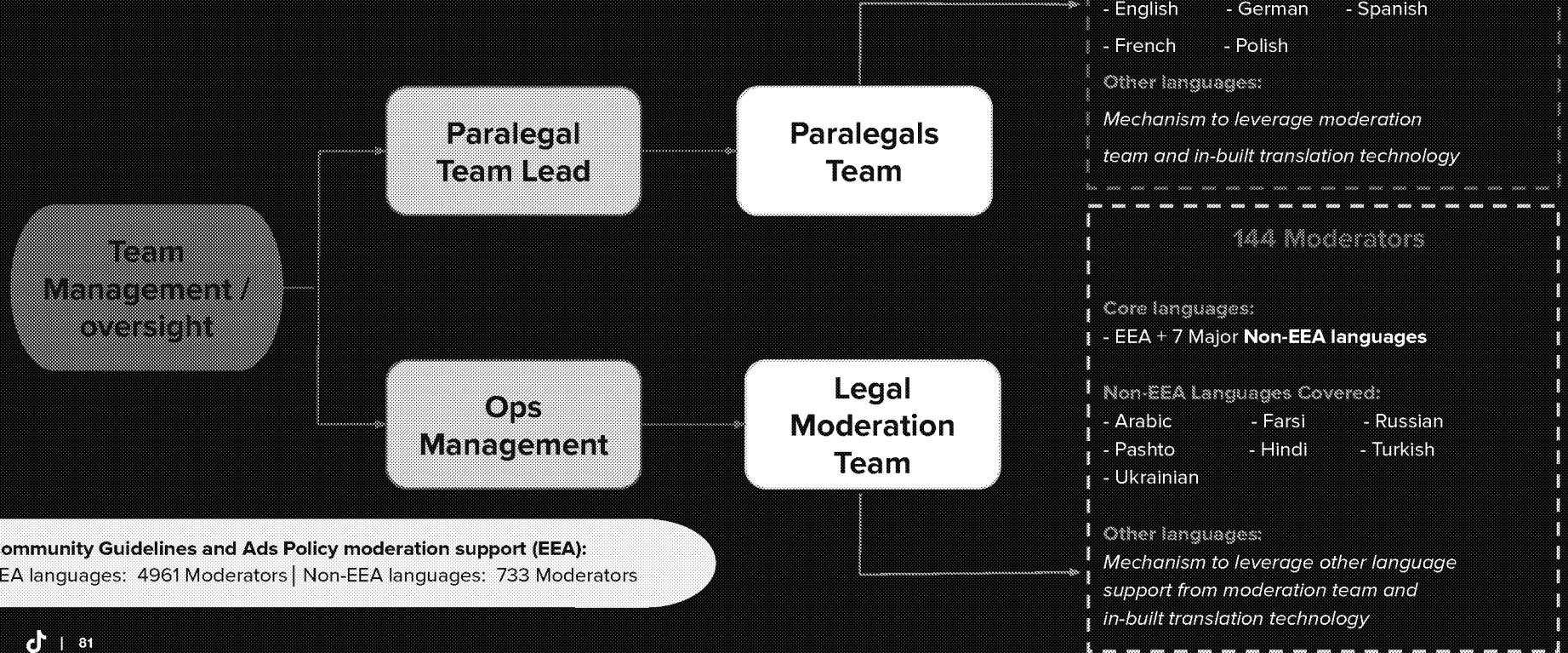
Unsuccessful
appeal

Recap of the content Journey

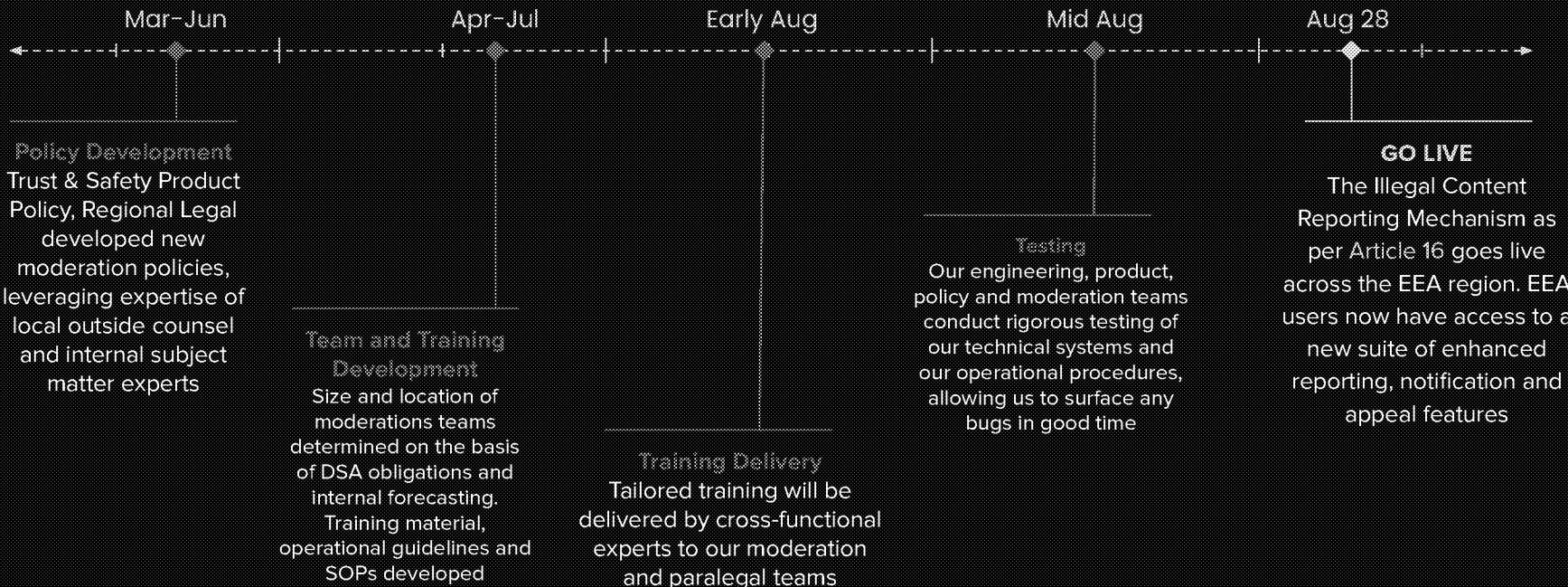


Team structure and timeline to ‘Day 1’

Legal Moderation Team Structure



Evolution of the Moderation Team



Q&A

Up next, a quick 15
minute break and
then:

Data Access &
Transparency

**You have just heard:
Content Moderation**

Break

Data Access & Transparency

Redacted

Redacted

Redacted

Redacted

Scope of the **Data Access + Transparency** workstream

TikTok will shortly provide EU-based researchers access to public data by **expanding our Research API to the EU**. We already provide access to commercial content for researchers through our Commercial Content Library API.

For Vетted Researcher access, we are **one of two platforms** opting to participate in the EDMO Data Access Pilot.

For Transparency, we are **industry-leading** on the data we already make public. We are developing and will **launch a dedicated hub** on our DSA compliance programme for users and our wider community.

Articles

Public data + Ads (40(12))
Ads transparency (39)
Vetted Researchers (40(4))
Transparency (15/24/42)

Teams

5

Trust & Safety, Policy & Transparency, Product, Government Relations, and Legal

Day 1

Research API - On track,
Vetted Researchers - proactively engaging in pilot
Transparency - on track to launch dedicated hub and October transparency report

Deliverables

5

People

80

Reach

Research API (US, EEA+CH+UK)
Vetted Researchers + transparency (EU)

Key features of our solution

Present for Day 1

- Research API
- Commercial Content Library API
- EDMO pilot
- Transparency report (October)
- User transparency

What is coming next

- Preparing for complex data access requests in '24
- Challenging reporting timings

Aim for the Highest

- Improvements already made to the Research API
- Significant resources and time for the EDMO pilot
- Already disclosing some metrics
- Developed dedicated DSA hub

Working with the Research Community

TikTok's Trust & Safety Team has invested in an **Outreach and Partnerships** function in order to engage with civil society, including the research community

Academic partnerships consist of consultations, conference engagements, speaking events, and commissioning or collaborating on research projects



TikTok Research API

TikTok's Research API represents a long term investment by the company to share public data with the research community at scale

We have a large cross-functional team actively working to build, assess, and communicate about this tool

It is currently available to academic researchers in the US on an application basis. We will be launching to Europe in August

About the Research API

Available Data

-  Public Content / Video Data
-  Public Accounts Data
-  Public Comments Data

Not included

-  Private content or accounts
-  Content taken down through moderation
-  Other private data, such as direct messages

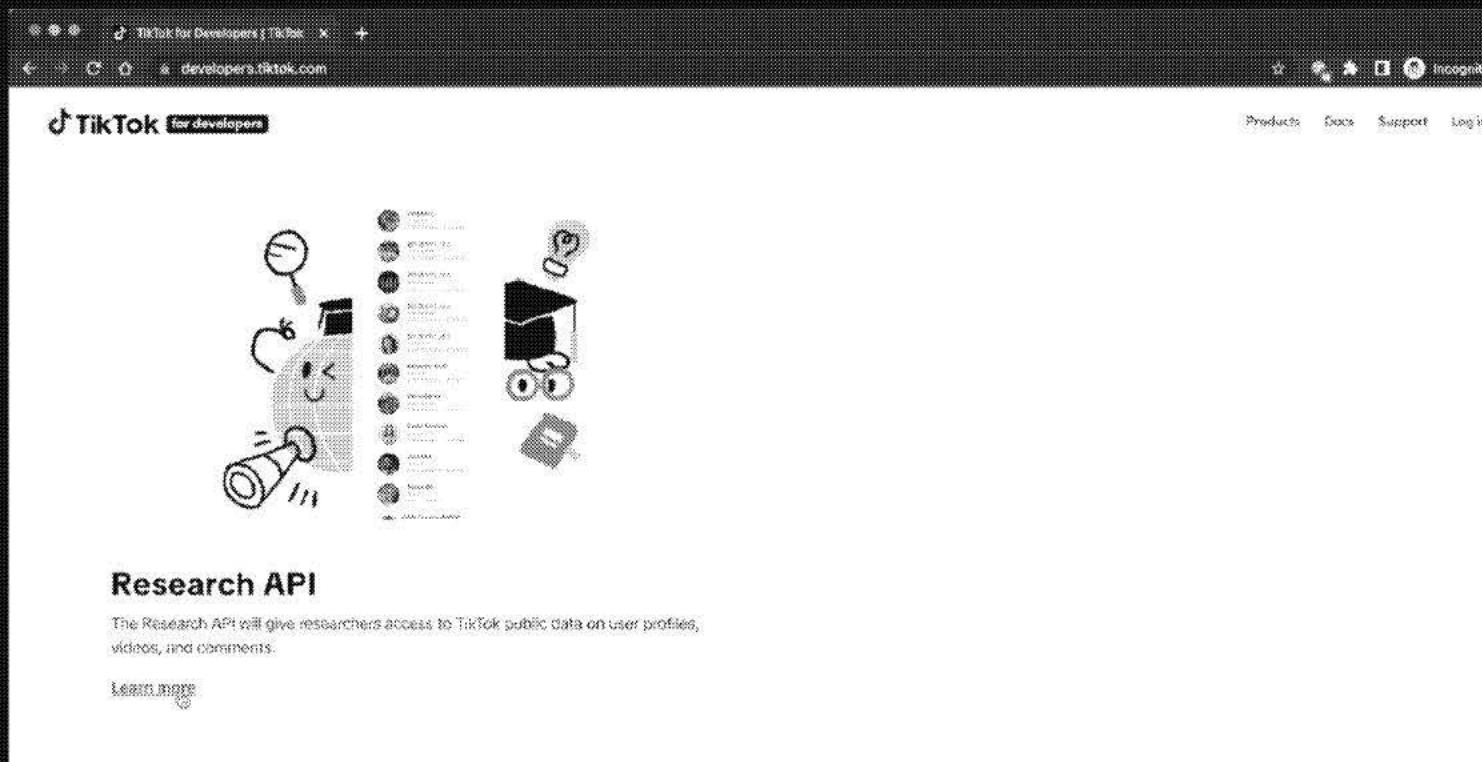
Types of Queries

1 Video query

2 User info query

3 Video comments query

Research API Demo



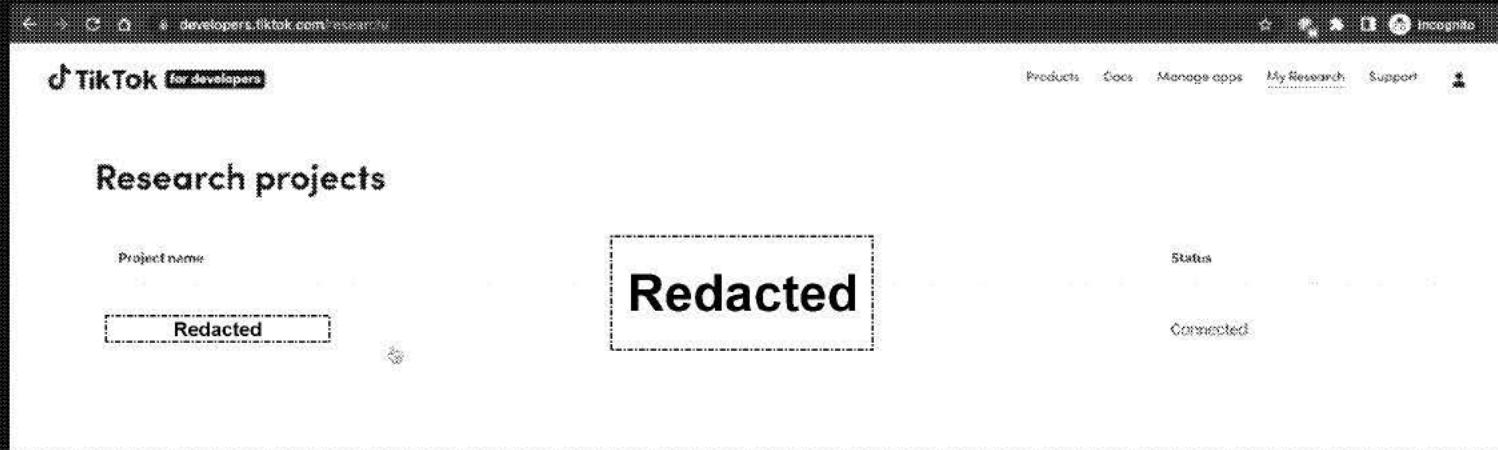
93

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[Video demo link](#)

TT HJC 007115

Research API Demo



The screenshot shows a web browser window for the TikTok Developers site. The URL in the address bar is `developers.tiktok.com/research`. The page title is "Research projects". The main content area displays a table with one row. The first column is labeled "Project name" and contains the value "Redacted". The second column is labeled "Status" and contains the value "Connected". The entire row is enclosed in a large rectangular redaction box. The top navigation bar includes links for "Products", "Docs", "Manage apps", "My Research" (which is the active tab), and "Support".



Company

[About TikTok](#)[TikTok Browser](#)[Newsroom](#)[Contact](#)[Careers](#)[SyncDevice](#)

Programs

[TikTok for Good](#)[TikTok Embeds](#)[Effect House](#)[TikTok for Developers](#)[Advertise on TikTok](#)[TikTok Rewards](#)

Resources

[Help Center](#)[Safety Center](#)[Creator Portal](#)[Community Guidelines](#)[Transparency](#)[Accessibility](#)

Legal

[Cookies Policy](#)[Privacy Policy for Younger Users](#)[Intellectual Property Policy](#)[Law Enforcement](#)[Privacy Policy](#)[Terms of Service](#)

Research API Demo

The screenshot shows a web browser window for the TikTok Research API. The URL in the address bar is `developers.tiktok.com/`. The page title is "TikTok for developers". The main content area is titled "Redacted". On the left, a sidebar shows a navigation tree: "Research projects" (selected), "venkatesh-test-client", "Details", and "Approved scopes". The "Details" section contains fields for "Client ID" (Redacted), "Client key" (Redacted), "Client secret" (Redacted), and "Status" (Connected). The "Approved scopes" section lists two items: "research.data.basic" (Access to TikTok public data for research purposes) and "research.adlib.basic" (Access to public commercial data for research purposes). A vertical "CONFIDENTIAL & PROPRIETARY" watermark is on the right.

Redacted

Details

Client ID	Redacted	Client key
Client secret	Status	Connected

Approved scopes

Each scope represents the datasets you can access for your project.

- research.data.basic
Access to TikTok public data for research purposes
- research.adlib.basic
Access to public commercial data for research purposes

Research API Demo

The screenshot shows a web browser window with the URL `https://developers.tiktok.com` in the address bar. The page is titled "Research API Demo". On the left, a sidebar menu lists various developer tools: Overview, App Management, Our Guidelines, Integration Essentials, Login Kit, Share Kit, Content Posting API, Display API, Research API (which is expanded to show "Getting Started", "API Reference", "Client Access Token Management", "Embed", "Green Screen Kit", "Scopes", and "Legacy Products"), and a "Comments" section. The main content area is titled "Getting Started" and contains text about using the Research API to query video data and fetch public TikTok account data. It also includes sections for "View your client registration" (with a note about client key and secret), "Obtain a client access token" (with a note about client secret), and "Query TikTok public content data". A "Video demo link" is located at the bottom right of the main content area.

Getting Started

This guide will show you how to use the Research API. Learn how to use the Research API to query video data and fetch public TikTok account data in the following use case example.

View your client registration

Once your application is approved, a research client will be generated for your project. You can view your approved research projects [here](#). Select a project from the list to see the research client details.

The provided **Client key** and **Client secret** are required to connect to the Research API endpoints. The client key and secret are hidden by default but can be displayed by clicking the **Display** button (eye icon).

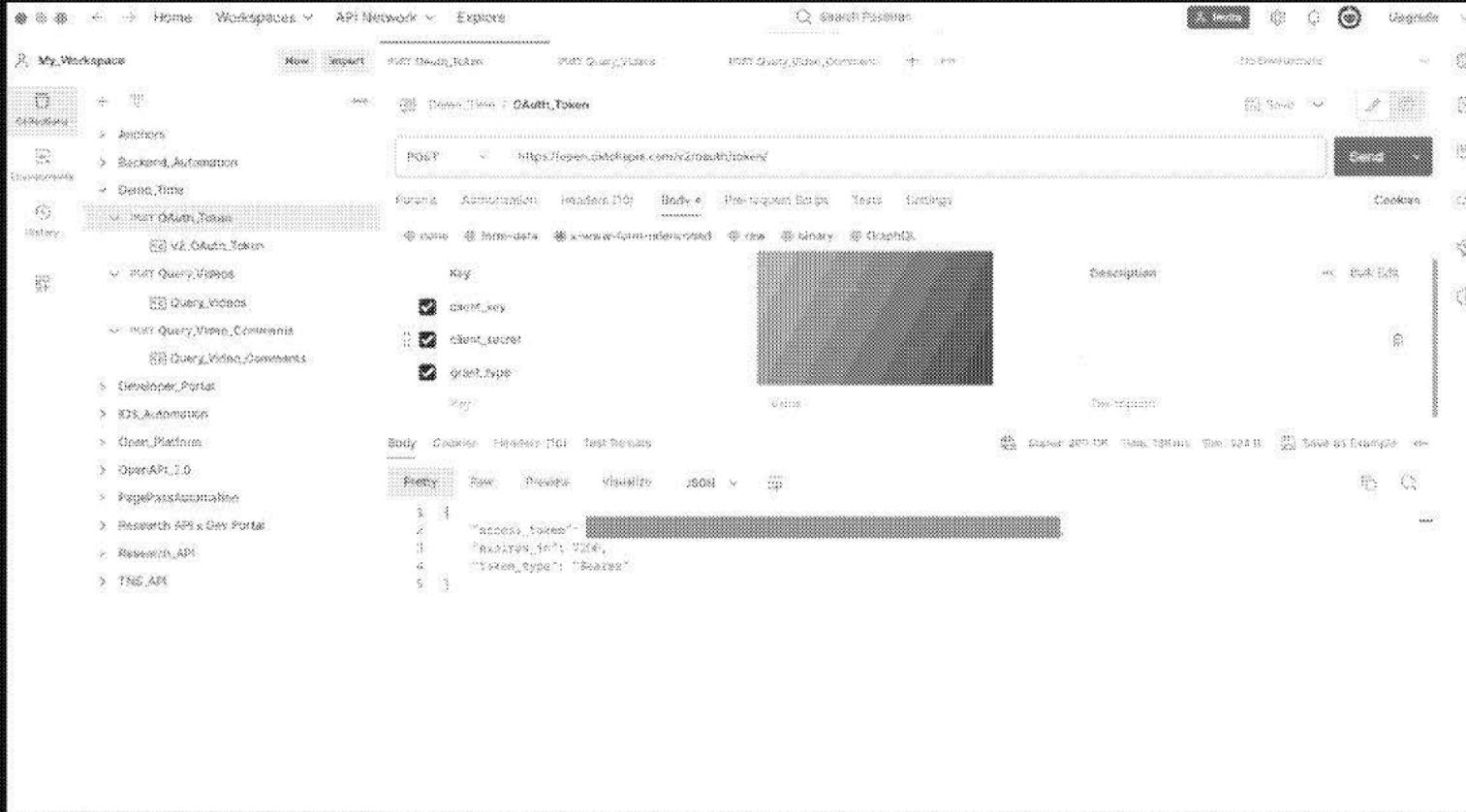
The client secret is a credential used to authenticate your connection to TikTok's APIs. Do not share this with anyone!

Obtain a client access token

Once you have obtained the client key and secret for your project, generate a client access token. Add this access token in the authorization header of the http requests to connect to the Research API endpoints.

Query TikTok public content data

Research API Demo



The screenshot shows a web-based API testing tool interface. The top navigation bar includes 'Home', 'Workspaces', 'API Network', 'Explore', 'Search APIspec', 'Upgrade', and a user icon. The left sidebar is titled 'My Workspace' and lists various API categories: Authors, Backend, Automation, Demo, Time, Data, Video, Research, OpenAPI, and TNG API. The 'Data' category is currently selected. Under 'Data', the 'v2 OAuth Token' sub-item is selected, showing a list of OAuth parameters: client_id, client_secret, and grant_type. The main workspace shows a POST request to 'https://open.particleapi.com/v2/auth/token'. The 'Body' tab displays a JSON payload with the key 'access_token' and its value redacted. The 'Headers' tab shows 'Content-Type: application/json'. The 'Body' tab also includes tabs for 'Raw', 'Message', 'Visualize', and 'JSON' (which is selected). The bottom right of the interface includes a 'Save as Example' button and a 'Run' button.

Research API Demo

The screenshot shows the Postman application interface. The left sidebar lists 'My Workspace' with various collections: Anchors, Backend_Automation, Better_Excel, Post_Graph_Power, Post_Query_Videos, Post_Query_Orders_Concepts, Post_Query_Users, Post_Query_Users_2, Research_API, TikTok_API, and User_Info. The 'User_Info' collection is currently selected. The main workspace shows a POST request to the URL `https://open.tiktokapis.com/v1/research/users/info?fields=open_id,display_name,bio,description,star_ticks,verified,follower_count,following`. The request body is a JSON object:

```
POST https://open.tiktokapis.com/v1/research/users/info?fields=open_id,display_name,bio,description,star_ticks,verified,follower_count,following
Content-Type: application/json
{
  "open_id": "https://open.tiktokapis.com/v1/research/users/info?fields=open_id,display_name,bio,description,star_ticks,verified,follower_count,following",
  "follower_count": 6691364,
  "is_exclusive": true,
  "tiktok_count": 10165896,
  "bio": "I'm a tiktok star with a lot of fans! I'm a real person, not a bot.",
  "bio_description": "Some random text about myself with some length to it in the right place",
  "display_name": "Random Name",
  "following_count": 78,
  "is_private": false
}

{
  "error": {
    "code": 200,
    "message": "",
    "log_id": "202307120202024AAB31E10A28"
  }
}
```

[Video demo link](#)

Research API Demo

The screenshot shows a web-based API development environment. The top navigation bar includes 'Home', 'Workspaces', 'API Network', 'Explore', 'Search Plugins', 'Upgrade', and 'Logout'. The left sidebar is titled 'My Workspace' and contains a 'Collections' section with items like 'Anchors', 'Research_Automation', 'Create_Video', 'Post_Auth_Token', 'Query_Videos', 'Query_Videos', 'Query_Video_Comments', 'Query_Video_Comments', 'Query_Video_Comments', 'API_Users_info', 'User_Jobs', 'Developer_Portal', 'iOS_Automation', 'Open_Platform', 'OpenAPI_2.0', 'PageAutomation', 'Research API x Dev Portal', 'Research API', and 'TMS API'. The main content area shows a POST request to 'https://api.tiktokapis.com/v1/research/video/query?fields=id,video,description,create_time,username,view_count,like_count,comment_count'. The 'Body' tab displays the following JSON query:

```
query: {
  "filters": [
    {
      "operation": "EQ",
      "field_name": "verb_id",
      "field_value": "11111111111111111111"
    },
    {
      "operation": "EQ",
      "field_name": "sharing_type",
      "field_value": "11111111111111111111"
    }
  ],
  "not": [
    {
      "operation": "EQ",
      "field_name": "video_length",
      "field_value": "11111111111111111111"
    }
  ]
}
```

The 'Headers' tab shows 'Content-Type: application/json'. The 'Preview' tab shows a response with a status of 200 OK, a response time of 0.023, and a size of 56.7KB. The response body is as follows:

```
data: [
  {
    "id": "11111111111111111111"
  }
]
```

At the bottom, there are tabs for 'Status', 'Headers', 'Body', 'Preview', 'Messages', 'JSON', and 'Raw'. The bottom right corner includes links for 'Get API', 'Create API', 'Edit API', 'Delete API', 'Path', and 'demo link'.

Research API Demo



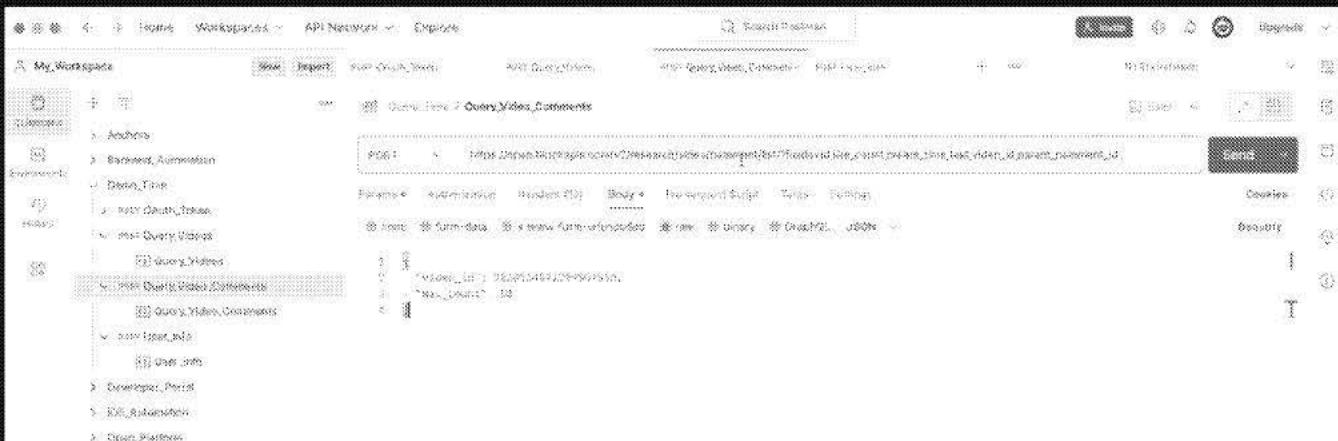
ct | 100

[Video demo link](#)

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Research API Demo



Research API Demo

Graph Explorer API Call Result:

```

{
  "value": [
    {
      "id": "00000000-0000-0000-0000-000000000000",
      "text": "Great video! I really enjoyed it.",
      "user": {
        "id": "11111111-1111-1111-1111-111111111111",
        "name": "John Doe"
      }
    },
    {
      "id": "00000001-0000-0000-0000-000000000001",
      "text": "I agree with you! The analysis was spot on.",
      "user": {
        "id": "22222222-2222-2222-2222-222222222222",
        "name": "Jane Smith"
      }
    }
  ]
}
  
```



at 1 102

[Video demo link](#)

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Vetted Researcher Access

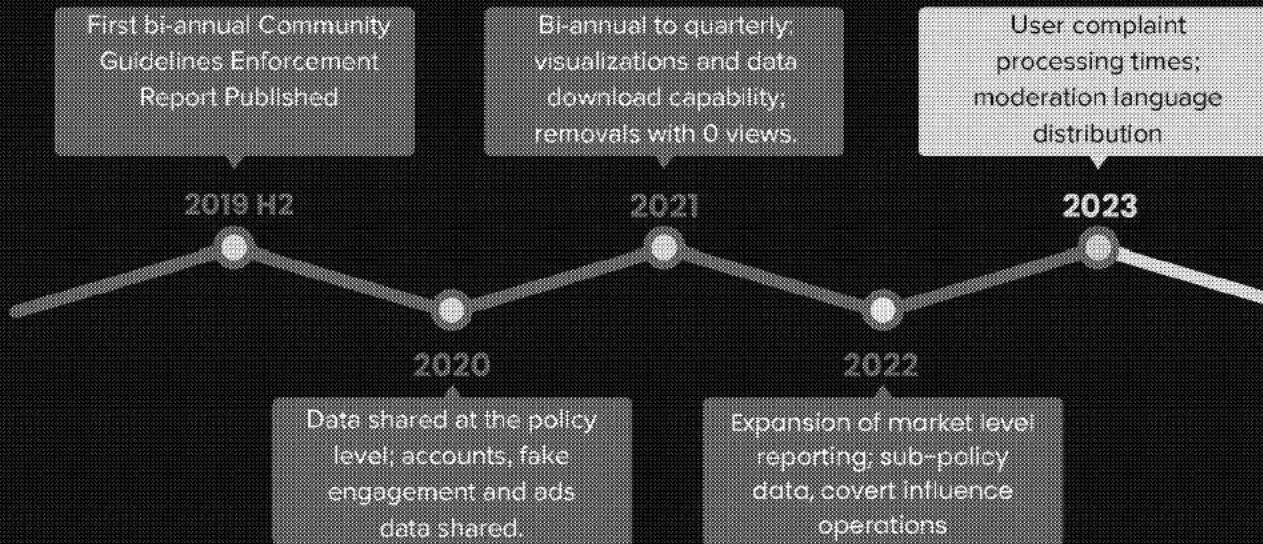
Preparations are underway at TikTok to enable access to data for vetted researchers

At present, we are invested in two main workstreams:

- Sharing a test dataset with EDMO as part of a data access pilot
- Participating in the EDMO Working Group on Establishing an Independent Intermediary Body



Evolution of our reporting



We continue to invest in improving our reporting - our first CG report in H2 2019 included three metrics and 15 total data points now we provide more than 1,500 per report

tiktok.com/transparency

Reinforcing our commitment to transparency

- European Online Safety Hub
- Data sharing efforts (e.g Safety Advisory Counsel) expanded to broader research community
- Strong feedback on existing efforts (e.g COPD)
- Learnings to be incorporated into global reporting

European Online Safety

We believe creative and joyful experiences on TikTok start with feeling safe. That's why we welcome online safety regulation across Europe and support their overall ambition.

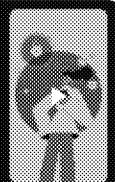


At TikTok, we welcome regulatory transparency and accountability requirements such as those set out under the Digital Services Act, as we strive to help people better understand how we use technology and deploy our teams to keep TikTok a safe place for creative and joyful experiences. This is why we are proud to provide you with this one-stop-shop for learning more about the measures we have in place to keep you safe online.

European Commission's DSA package

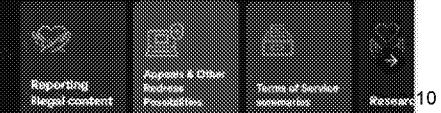
TikTok supports the principles of the DSA's Digital Services Act, which aims to create the most robust online governance framework for the digital space.

Learn more



Guides

We developed a series of guides to help you understand our approach to safety.



**You have just heard:
Data Access and
Transparency**

**Up next,
Ads and Commercial
Content**

Advertising and Commercial Content

Redacted

Redacted

Scope of the Ads & Commercial Content workstreams

- We have already launched 'about this ad' to give transparency over **advertising parameters** and we have expanded our **labelling of commercial communications**
- TikTok is launching a publicly available **library of ads and other commercial communications (CCL)** in website and API formats
- **On 11 July TikTok ceased to present ads to minors (under 18s) based on profiling.** Only non-profiled (i.e. generic) ads can be delivered to minors. These use broad/non-specific data points, such as, country, language and declared age

Articles

Advertising Transparency (26)
Minor Protection (28(2))
Commercial Content Library (39)

Deliverables

21

Teams

23

including ads and data science

People

100 to 150

across all products

Reach

> Global for labelling and transparency tools
> EEA + UK + CH for Minor Protection
> EEA + UK + CH for CCL

Key features of our solution

Present for Day 1

- 'About this Ad' feature live
- Expanded labelling of commercial communications
- All targeted advertising to <18 users stopped
- CCL: Web and API versions live with all ad types, advertiser information and main targeting parameters

What is coming next

- About this Ad: continuing to expand on information displayed for users
- CCL: improving the functionality and level of detail

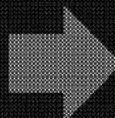
Aim for the Highest

- About this Ad & Labelling of commercial communications: Available globally
- CCL & Minor Protection: UK and Switzerland also included
- CCL: Includes any relevant ads published on or after 1 October 2022
- CCL: Exploring the inclusion of ads shown in additional regions (i.e. outside Europe)

TikTok has launched the product solutions for each of the four key “ads and commercial” related areas ahead of Day 1, with increased focus on transparency and user experience!

1

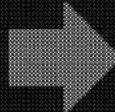
Article 26(1) requires: the platform to provide meaningful information directly and easily accessible from the advertisement about the main parameters used to determine the recipient to whom the advertisement is presented



The "About This Ad" in-app feature displays main targeting parameters used as well as advertiser information.

2

Article 26(2) requires: platforms to design and implement an appropriate means for creators to disclose "Commercial Communications"

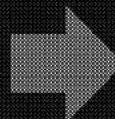


TikTok is enabling all users (Creators, brands, publishers...) globally to add a disclosure to videos promoting a brand, product or service.

TikTok has launched the product solutions for each of the four key “ads and commercial” related areas ahead of Day 1, with increased focus on transparency and user experience!

3

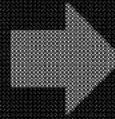
Article 28(2) requires: providers of online platforms to not present advertising on the interface based on profiling (using personal data of the recipient of the service)



TikTok has ceased presenting ads to minors based on profiling on 11 July.

4

Article 39 requires: VLOPs, including TikTok, to offer a publicly available, online library containing all "Advertisements" and other "Commercial Communications" delivered to users in the "EEA"



TikTok has already completed development of its commercial content library website and API, utilizing internal and external testers feedback and is launching this publicly in the week of 17 July.

Let's jump in each area of focus!

About this Ad

TikTok must provide users with "*meaningful information directly and easily accessible from the advertisement about the main parameters used to determine the recipient to whom the advertisement is presented...*"

- The "**About This Ad**" feature is the in-app mechanism through which to satisfy this obligation - it is available globally (including EU) for any ad type
- Found easily by long pressing the ad video or clicking on share icon
- Displays main targeting parameters used to target a group of users as well as the advertiser/funding person information under Article 26(1)(b)-(c),
- Additional user controls (mute advertiser)

How to identify ads and other commercial communications on TikTok

Ads

(paid for and uploaded by advertisers/agencies)

Digital advertisement that promotes a product

'Ad' label

"Organic" commercial communications

(no payment to TikTok, and uploaded by ANY creator)

Promoting 3rd party or another brand

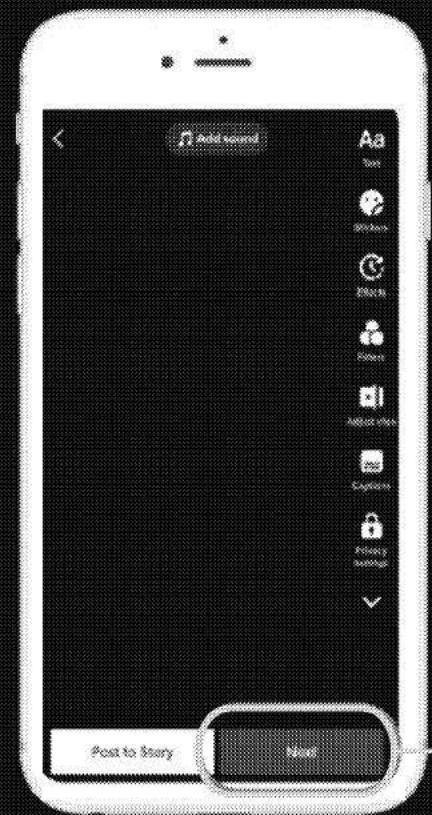
'Paid Partnership' label

Promoting Creator's own business (brand, product or service)

'Promotional Content' label

Labelling organic commercial communications: user journey - disclosure

User selects between communicating that they are promoting their own product/brand or those of a third party

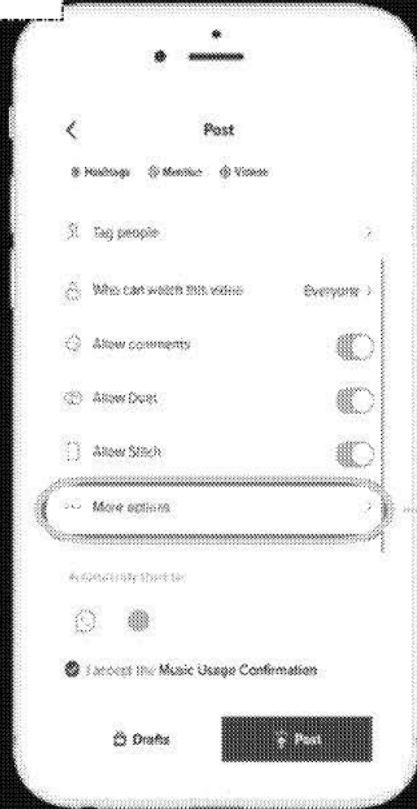


When posting a new video, the user clicks 'Next'

Labelling organic commercial communications:

Redacted

User selects between communicating that they are promoting their own product/brand or those of a third party



User clicks 'More options'

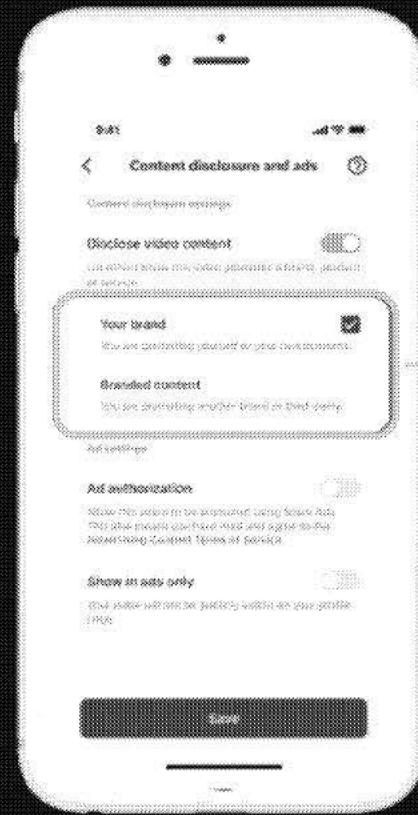
Labelling organic commercial communications: user journey - disclosure

User selects between communicating that they are promoting their own product/brand or those of a third party

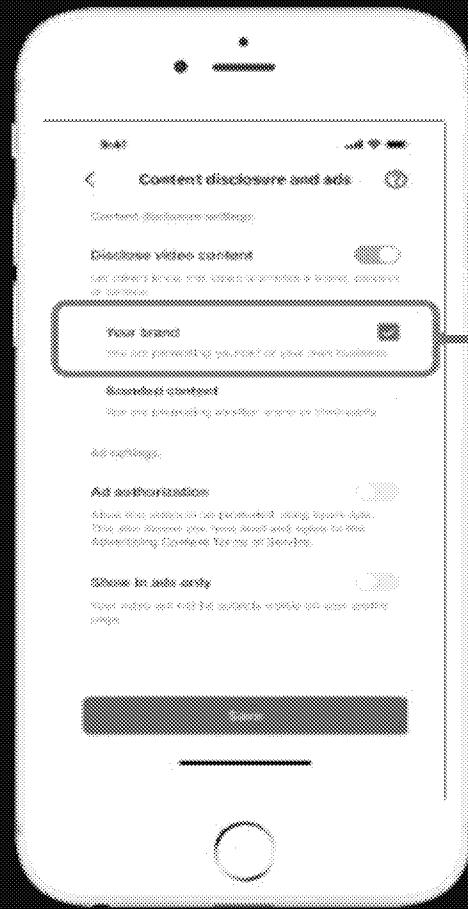


User turns on 'Disclose video content'

Labelling organic commercial communications: user journey - disclosure



Labelling organic commercial communications: user journey - in-app label



User selects 'your brand'

Labelling organic commercial communications: user journey - in-app label

Content is labelled
as 'promotional
content'

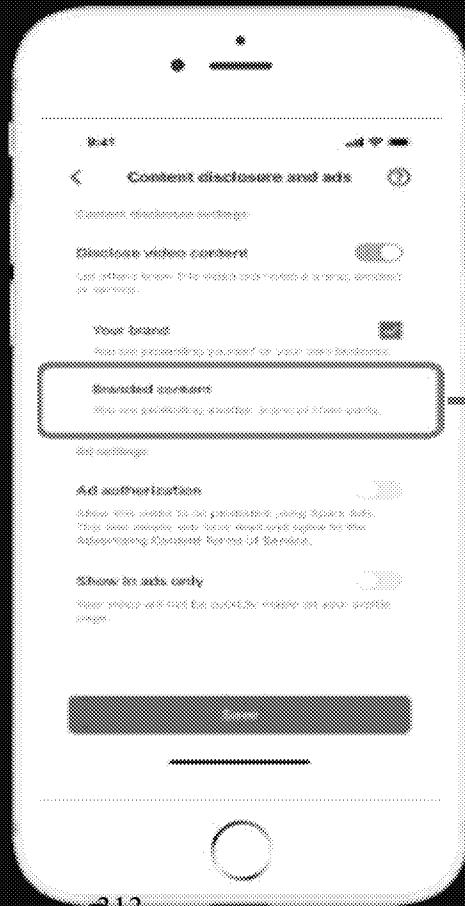
Redacted

Labelling organic commercial communications: user journey - in-app label

Content is labelled
as 'promotional
content'

Redacted

Labelling organic commercial communications: user journey - in-app label



User selects
'branded content'

Labelling organic commercial communications: user journey - in-app label

Content is
labelled as 'Paid
Partnership'

Redacted

Labelling organic commercial communications: user journey - in-app label

Content is
labelled as 'Paid
Partnership'

Redacted

Commercial Content Library - Scope and data availability

Content type: *Ads* (i.e. TikTok advertising inventory); and *organic commercial communications* (i.e. user content posted by influencers or on a business's own TikTok account)

Data availability

- Any ad that has at least one view, has been published on or after 1 October 2022 and is targeted to users within the EEA, Switzerland or the UK.
- Each ad and ad details will be available in the library for one year after the advertisement was last viewed by any user.
- Advertiser info: name of the advertiser as well as the person or entity that paid for the ad.
- Ad Stats: First shown, last shown, # of unique users seen
- Targeting Info: Main targeting parameter

Access:

- Globally accessible website and public API

Commercial Content Library - API

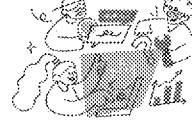
TikTok for Developers - Home page

CONTAINS BUSINESS CONFIDENTIAL INFORMATION.
CONFIDENTIAL TREATMENT REQUESTED

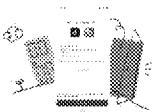
7

Build tools for creators,
researchers, and
communities

Learn more

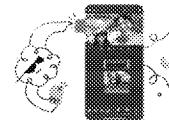


Our products



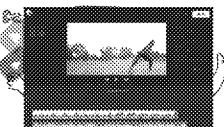
Login Kit

Build tools for creators, researchers, and communities



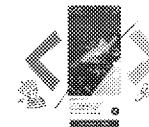
Share Kit

Build tools for creators, researchers, and communities



Content Posting API

Build tools for creators, researchers, and communities



Embed videos

Build tools for creators, researchers, and communities



Green Screen Kit

Build tools for creators, researchers, and communities



Display API

Build tools for creators, researchers, and communities



Research API

Build tools for creators, researchers, and communities



Commercial Content API

Build tools for creators, researchers, and communities

12
7

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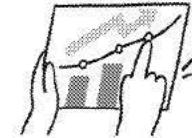
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Commercial Content Library - API

TikTok for Developers - Product Introduction page

Commercial Content API

TikTok is working towards enhancing transparency on advertisements presented on our platform. As part of our efforts, we have built commercial content related APIs that includes ads, ad and advertiser metadata, targeting information. Such advertisement-related data will be accessible for the period when the advertisement is run and until one year since the advertisement was last shown to any user.



These APIs will allow the public and researchers to perform customized, advertiser name or keyword based searches on ads and other commercial content data that is stored in the Commercial Content Library repository. These APIs are made available globally and will include ads data from EU to begin with, while we build capacity to expand to various commercial and regional data sets.

What data will be available?

With the Commercial Content APIs, the public and researchers can access public data on:

• Paid Ads

This includes data on ads such as the published date, last seen date, targeting information, number of people who have seen the ad. We also share selected information on ads disapproved on the platform.

• Advertiser

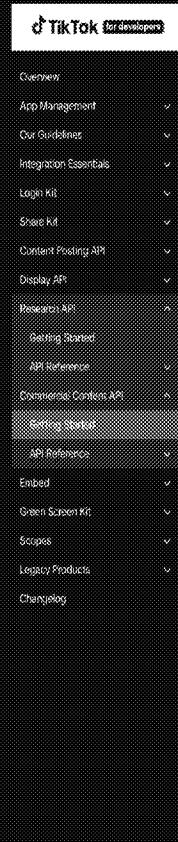
• Other commercial content

Redacted

Commercial Content Library

- API

API Specs/ Get Started page



Getting Started

This guide will show you how to use the Commercial Content API. Learn how to use the Commercial Content API to query ad data and fetch public advertiser data in the following use case example.

View your client registration

Once your application is approved, a research client will be generated for your project. You can view your approved research projects here. Select a project from the list to see the research client details.

The provided Client key and Client secret are required to connect to the Commercial Content API endpoints. The client key and secret are hidden by default but can be displayed by clicking the **Display** button (eye icon).

Note: The client secret is a credential used to authenticate your connection to TikTok's APIs. Do not share this with anyone.

Obtain a client access token

Once you have obtained the client key and secret for your project, generate a client access token. Add this access token in the authorization header of the http requests to connect to the Commercial Content API endpoints.

Query TikTok public content data

The `cURL` command below shows an example of how you can query the TikTok ads created in Italy between January 2, 2021 to January 9, 2021 with the keyword "coffee".

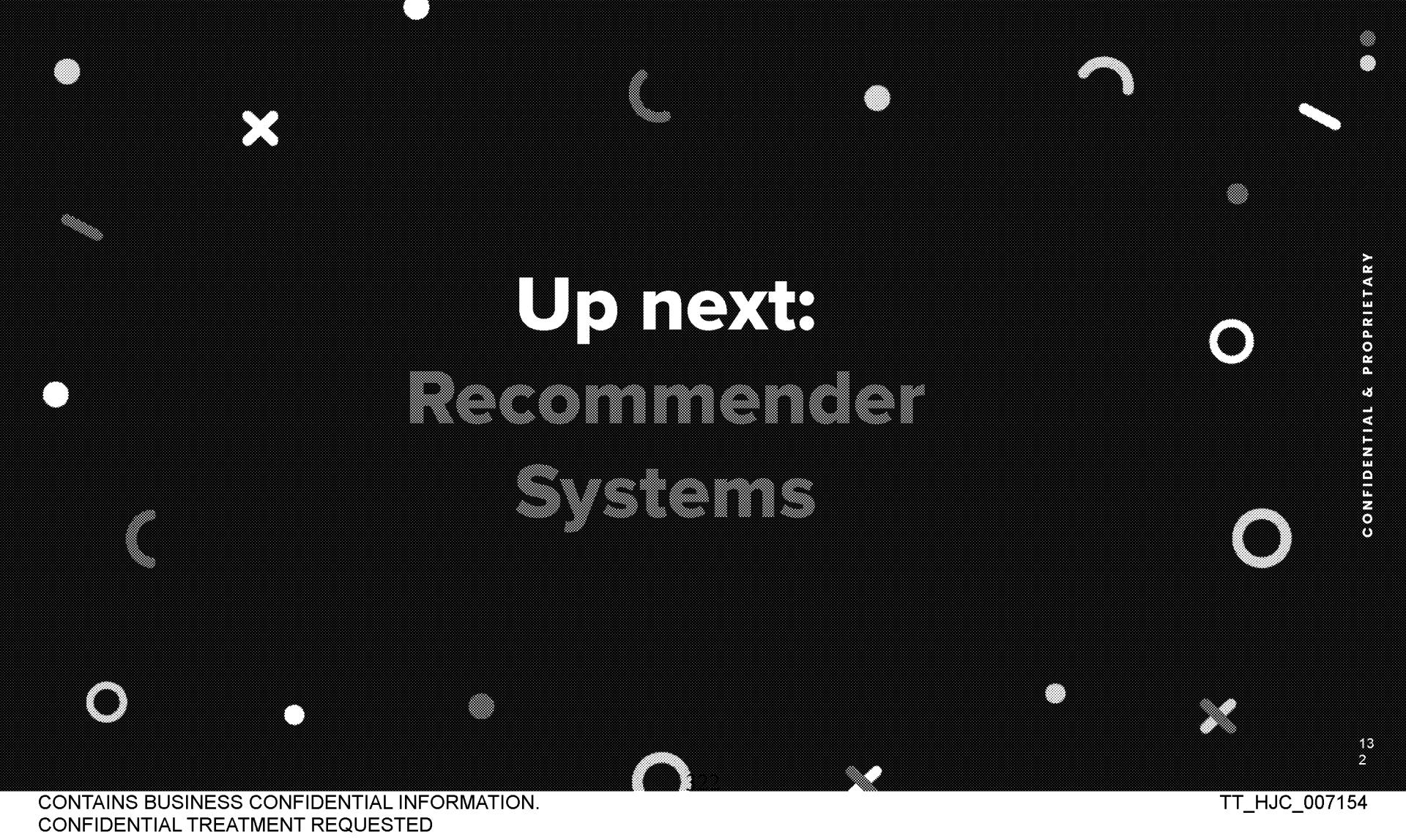
Commercial Content Library

Public Website

Demo video

13
0

**You have just heard:
Ads and Commercial
Content**



Up next: Recommender Systems

Recommender Systems

Redacted

Redacted

Scope of our Recommender Systems non-personalised alternative workstreams

TikTok will offer users non-personalised versions of content feeds and search. Users will be able to easily access these versions at any time.

Articles

Transparency (27)
Recommender
Systems (38)

Teams

Privacy and Responsibility;
Responsible
Recommendation System;
User Experience;
11 Core product teams

Day 1

Non-personalized feeds -
On track
Non-personalized
search- On track

Deliverables

9

People

c.200

Reach

EEA

TikTok's core features powered by recommender systems

- Content feeds (For You, Following, Friends, LIVE)
- Search (Top, Videos, Users, Sounds, LIVE, Hashtags)

How does recommendation work?

Most of the content on TikTok is consumed on the For You feed. Recommendations across the app and on the For You feed are based on a number of factors, including:

- User interactions such as the videos you like, share, comment on, watch in full or skip, accounts you follow, accounts that follow you, and when you create content.
- Video information such as captions, sounds, hashtags, number of video views, and the country in which the video was published.
- User information such as your device and account settings, language preference, country, time zone and day, and device type.

How are non-personalised core features powered?

- **Non-personalised Content feeds:**
 - For You, LIVE: Popular content in the region and globally
 - Following, Friends: chronological content sorting
- **Non-personalised Search:**
 - Uses region and preferred language user information
 - Uses search query and content related signals (e.g. description, recency, popularity)

Article 38 requires VLOPs to provide at least one option for each of their recommender systems which is not based on profiling as defined under the GDPR.

Our non-personalized feeds solution

Recital 94 to Article 38 should provide that very large online platforms provide alternative options which are not based on profiling in a way that they are directly accessible from the online interface where the recommendations are presented.

Redacted

Our solution for Search

Recital 94 to Article 38 should provide that very large online platforms provide alternative options which are not based on profiling in a way that they are directly accessible from the online interface where the recommendations are presented.

Redacted

Our approach to Article 38 obligations

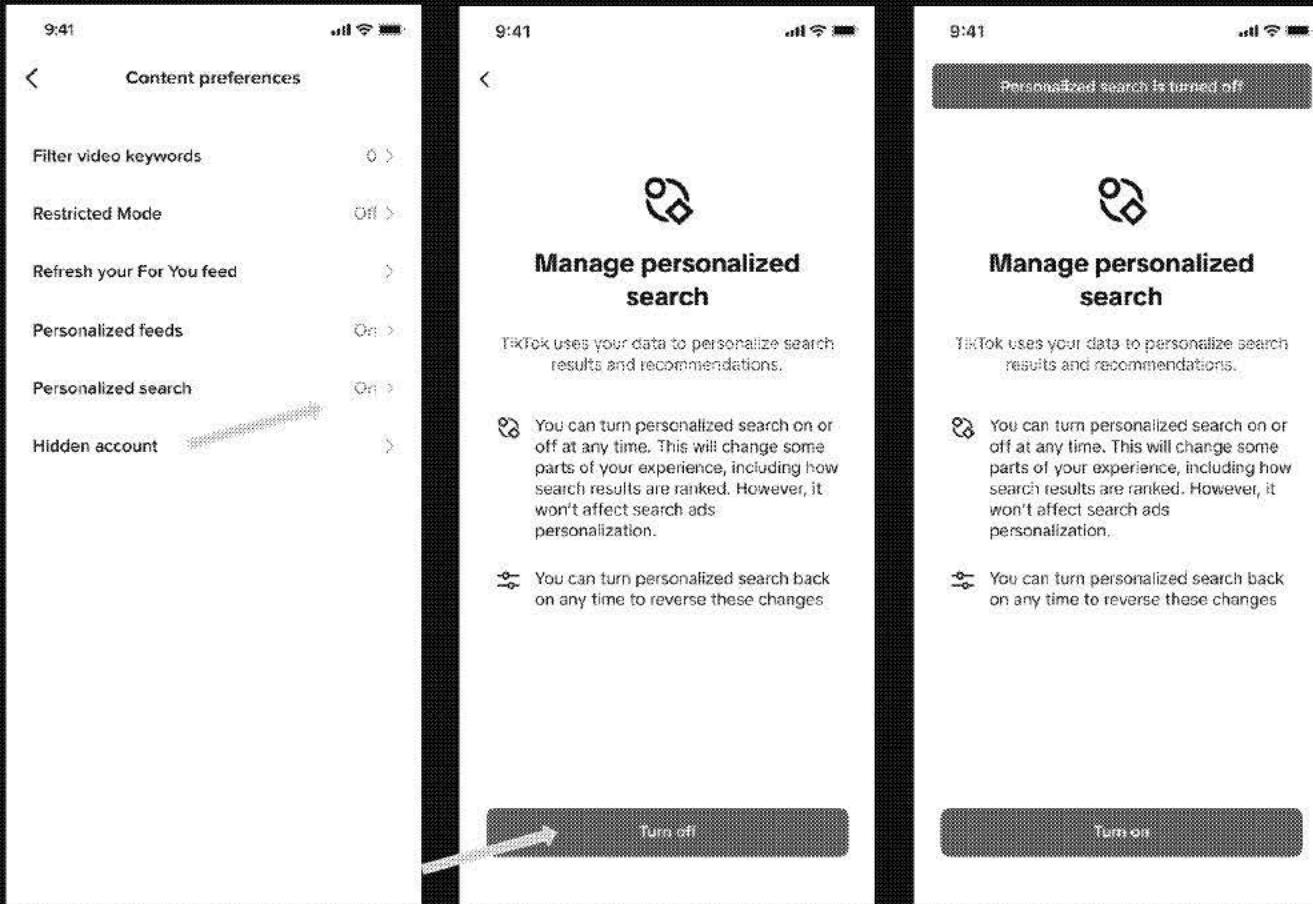


Currently testing options for TikTok app users (>90% of total users) for For You Feed, Following & LIVE recommender systems that don't involve user profiling.



On-track for delivery of Search & Friends recommender systems and support for before Day 1 of DSA compliance.

Additional entry point



Public transparency



Help Center explanation of the main parameters of recommender systems

Balance between accessibility and detail

Dedicated hub to increase transparency for users and our community

Getting started

- Using TikTok
- Getting started
- Create a video
- Create tools on TikTok
- Download
- Safety
- Effects
- Community
- Search
- Check your account status
- Sharing, posting, and deleting
- Accessibility

Exploring videos

- How TikTok recommends content
- For You
- Friends
- Discover
- Post discover content
- Watch videos in a playlist
- Video Download
- Discover and search
- Sharing and notifications
- Discover
- Direct messages
- Notifications
- TikTok creator

How TikTok recommends content

Jump to a section

- How recommendation systems work
- How TikTok recommends content in For You
- How to influence what you see on your For You feed
- Other factors that influence how TikTok recommends content

How recommendation systems work

TikTok's mission is to inspire creativity and bring joy. We have a wide variety of content and we want you to discover interesting and relevant videos. That's why we use recommendation systems to offer you a personalized experience. These systems suggest content based on your preferences, as expressed through interactions on our platform, such as following an account or liking a post. Your interactions act as signals that help the recommendation system predict content you're more likely to be interested in as well as the content you might be less interested in and may prefer to skip.

How TikTok recommends content in For You

When you open TikTok, you'll see the For You feed which displays a stream of videos just for you, so you can find content and creators you love. The For You feed's recommendation system selects videos from a large collection of eligible content and ranks them based on the system's prediction on how likely you'll be interested in each video. This means everyone has a unique For You feed - while some may see the same videos, each user's For You feed is unique and tailored to that specific person.

When you sign up for TikTok, we may invite you to select categories of interest, like pets or travel, which help us from your feed. If you don't select any categories of interest, we start by offering you a feed of recent videos which are popular with others on TikTok. When selecting your initial set of videos, the recommendation system looks for popular videos that are appropriate for a broad audience and influenced by your country and language settings. Once you start engaging with content on TikTok, things like your views, likes, likes, comments, shares, and other interactions will shape your For You feed as the system begins to learn more about your preferences.

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14
1

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Key features of our solution

Present for Day 1

- Non-personalised feeds
- Non-personalised search
- “How TikTok recommends content” Help Centre article

What is coming next

- Further UX improvements, so users have a holistic user experience throughout the app

Aim for the Highest

- “Learn more” link that outlines the details of the feature
- Making user choice easy:
 - Where content is present
 - Information notification
 - Content preferences

**Up next, a quick 15
minute break, and**

then:

**Youth Safety at
TikTok**

You have just heard: Recommender Systems

Break

Youth Safety At TikTok

Redacted

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Youth Safety & Wellbeing

Under 13

Keeping underage users
off of TikTok.

13-15 | 16-17

Designing safe and developmentally
optimal experiences

Evidence-based policy design

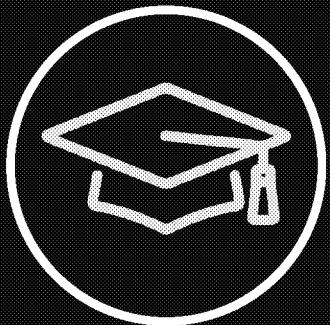
Informed by best-practices in design and qualitative research, our Youth Safety & Wellbeing policy team employs a multi-pronged approach to our policies.

**Review academic
literature**

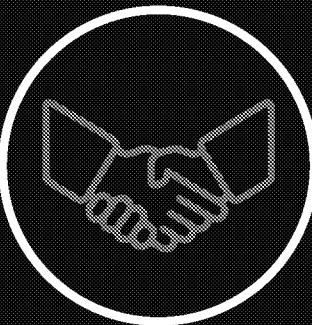
**Consult safety experts and
youth advisors**

**Consider and account for
regional nuances**

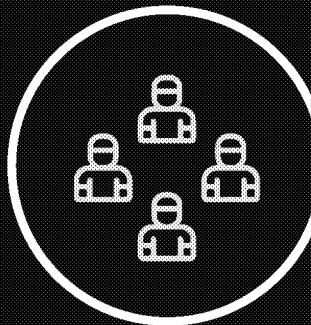
**Cross-reference relevant
policies with NCMEC**



Academics



Experts



Safety Advisory
Council



Law
Enforcement



Family
Online Safety
Institute



Boston Children's Hospital
Digital Wellness Lab



IWF
Internet
Watch
Foundation



WeProtect
GLOBAL ALLIANCE

Robust Community Guidelines for Youth Safety & Wellbeing

Policy Areas

Community Principles

Youth Safety & Wellbeing

- Safety and Civility
- Mental and Behavioral Health
- Sensitive and Mature Themes
- Integrity and Authenticity
- Regulated Good and Commercial Activities
- Privacy and Security
- For You Feed (FYF) Eligibility Standards
- Accounts and Features
- Enforcement

Age Requirement

You must be 13 years and older to have an account. If someone is below the minimum age on TikTok, we will ban that account. If an account holder believes they were incorrectly banned, they can appeal the decision. Community members can report someone on TikTok who they believe is under the minimum age, either in-app or online.

Youth-Specific Content Policies

We do not allow content that may put young people at risk of exploitation, or psychological, physical, or developmental harm. This includes child sexual abuse material (CSAM), youth abuse, bullying, dangerous activities and challenges, exposure to overtly mature themes, and consumption of alcohol, tobacco, drugs, or regulated substances. If we become aware of youth exploitation on our platform, we will ban the account, as well as any other accounts belonging to the person.

Age-Appropriate Experiences

Our goal is to provide young people with an experience that is developmentally appropriate and comfortable for different families. To ensure a safe space for self-exploration, we take several steps including: (1) limiting access to certain product features, (2) developing Content Levels that sort content by levels of thematic comfort, (3) using restrictive default privacy settings, and (4) making content created by someone under 16 ineligible for the FYF. You must be 16 years and older to use direct messages, and be 18 years and older to go LIVE, to send gifts to a creator during a LIVE session, or to use monetization features.

Youth-specific content policies

We do not allow content that may put young people at risk of exploitation, or psychological, physical, or developmental harm.

NOT Allowed or FYF Ineligible

Youth Exploitation & Abuse

Youth Nudity & Body Exposure

Youth Sexually Suggestive Content

Youth Alcohol, Tobacco, and Drugs

Age Assurance Measures

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Age Assurance

- 1 Minimum age requirement**
- 2 Self-declaration and technical measures**
- 3 Proactive detection**
- 4 Reporting (in-app and webform)**
- 5 Human review**
- 6 Appeals**



Continuous enforcement

We continue to enforce our minimum age requirements throughout the TikTok experience:

- Through signals like keywords in account bios or videos
- As part of our standard moderation process
- Thanks to reports from other community members

Accounts believed to belong to someone under 13 will be suspended.

Suspended accounts are given the opportunity to appeal.

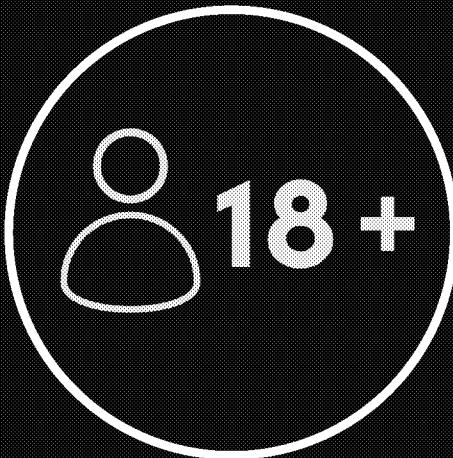
Age Appropriate Experience

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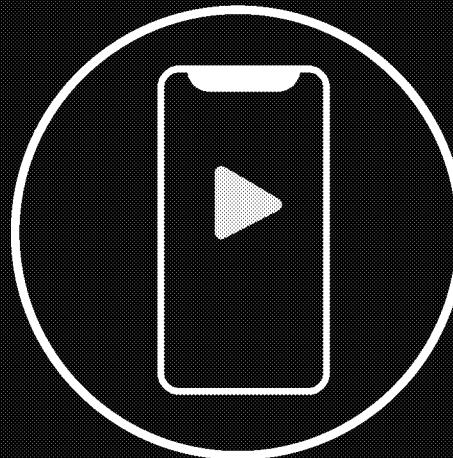
Removing content



Removing content



Age-restricting
content

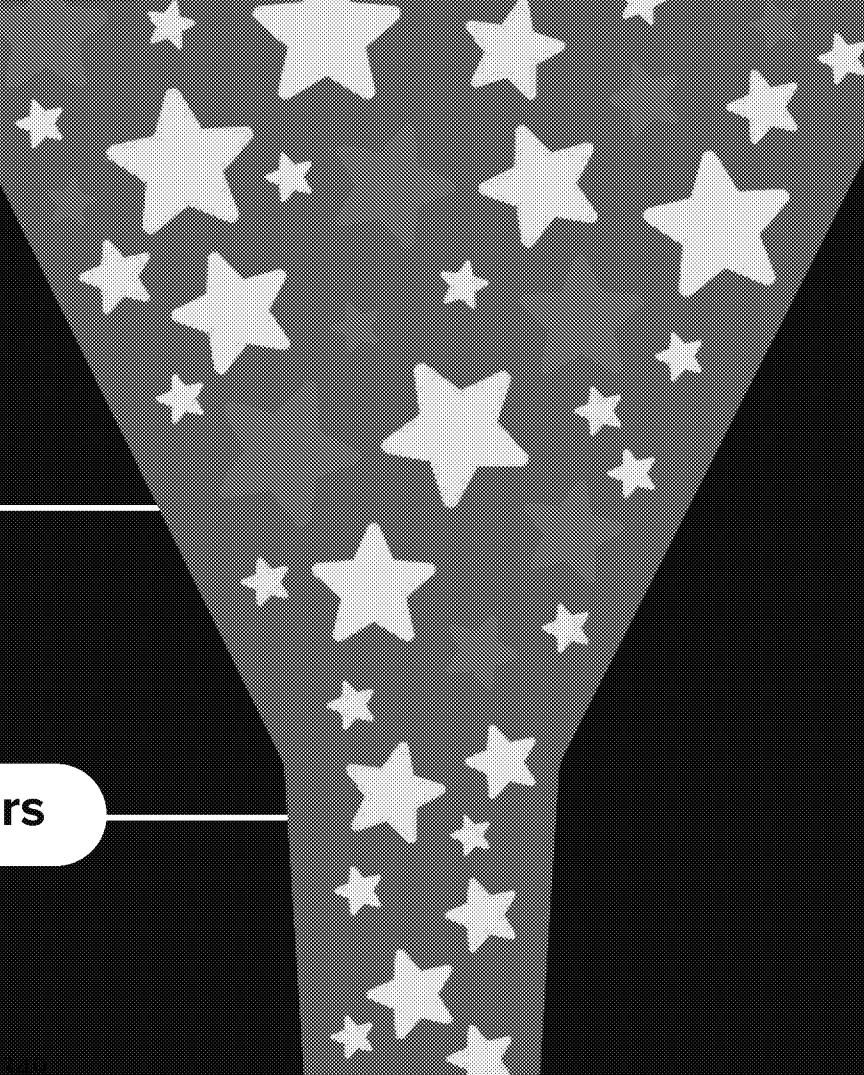


Feed
protections

Removing content

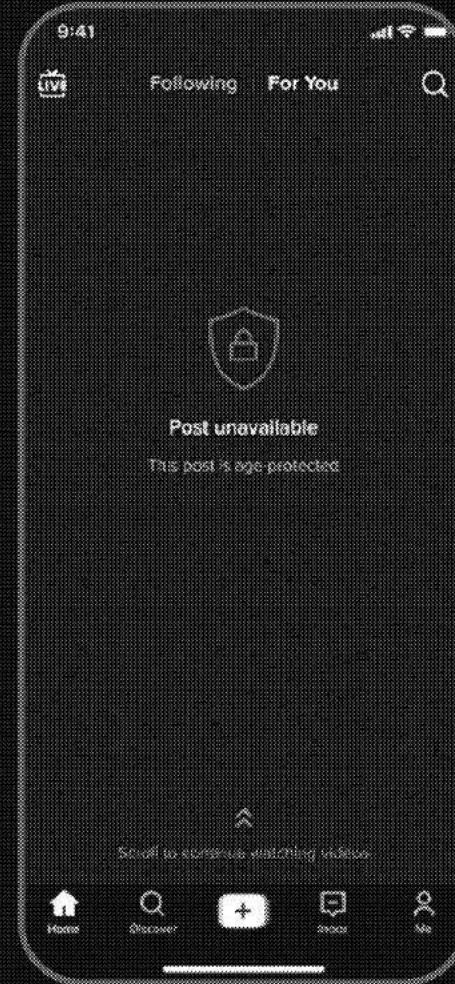
Automated technology

Content Moderators

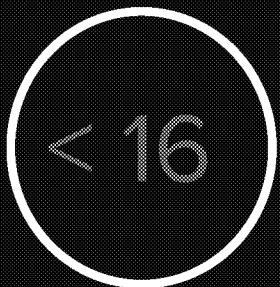


Age restricted content

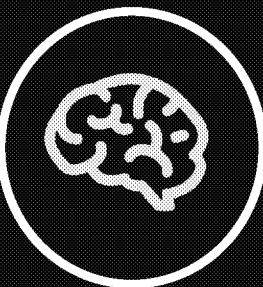
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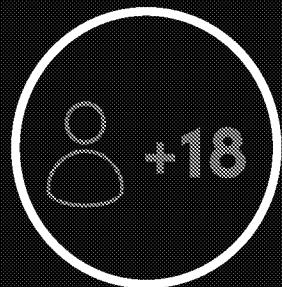
Feed protections



**Content from
accounts
under 16**



**Negative
effect
dispersion**



**Suggestive
content
filtering**



**Extreme diet
and fitness
dispersion**

Age-Restricted Account Management and Settings

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Age-appropriate limits on tools and features

All accounts under 16

PRIVATE by default **NO** Direct Messaging

ONLY FRIENDS can
comment on videos **NO** Duet and Stitch

NO downloading
their TikToks

All accounts under 18

Daily screen time
set to **60 minutes**

NO going **LIVE**

NO virtual gifts

A personal safety and privacy experience

Account settings:

- Private account
- Screen time tools
- Suggest your account

Community controls:

- Video viewing restrictions
- Direct Message restrictions
- Comment restrictions
- Comment filtering
- Disliking comments

Content controls:

- Restricted Mode
- 'Not interested'
- Filtering keywords
- Reporting

Parental and User Tools

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Family Pairing

In 2020, we launched Family Pairing, a suite of industry-leading youth safety features that let parents and guardians connect their TikTok account to their teens' accounts to guide the type of content available to their teen, promote healthy screen time habits, and choose appropriate settings.

Parental Controls

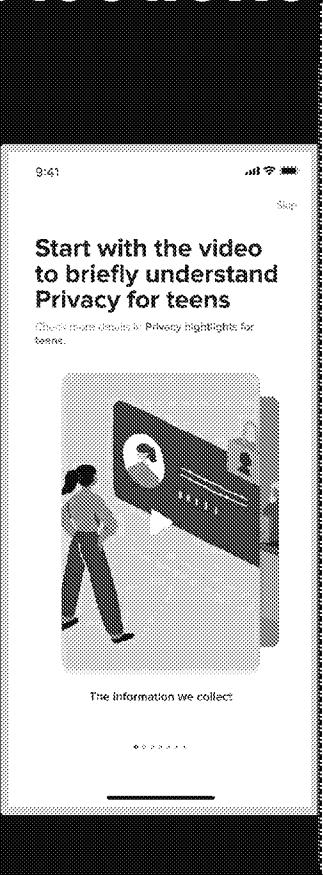
- ★ **Screen Time Management**
- ★ **Restricted Mode**
- ★ **Search**
- ★ **Discoverability**
- ★ **Suggest Account to Others**
- ★ **Direct Messages**
- ★ **Liked Videos**
- ★ **Comments**

Additional protections and support

Privacy Highlights for Teens

Take a Break videos

Muting notifications at night



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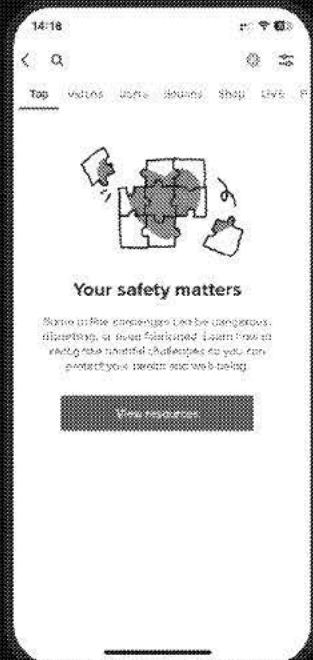
User Education Resources

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Our Safety Centre

- Guides on a variety of topics
- Detailed information on safety and privacy controls
- Links to our safety partners
- All easily accessible from within TikTok

Responding to online challenges

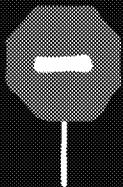


Searches for known dangerous challenges are redirected to our "Stop, Think, Decide, Act" guide



Our dedicated Online Challenges resource hub is available to everyone from our app and at our Safety Centre

Responding to online challenges



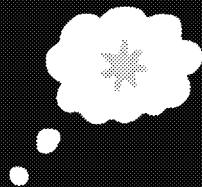
stop

STOP: Pause a moment.



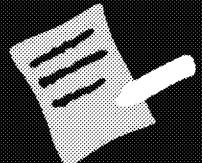
decide

DECIDE: If it's risky or harmful, or you're not sure if it is, don't do it. It's not worth putting yourself or others at risk.



think

THINK: Is it safe? Is it harmful? Is it real? If you're unsure, check with an adult or friends, or look for more information from authoritative sources online.

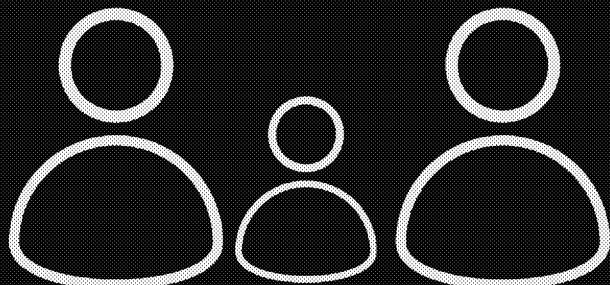


act

ACT: Report harmful challenges or hoaxes in-app. Don't share them.

Parents as partners

- Guardians Guide
- Tips from teens
- Family Pairing



The image shows two side-by-side mobile phone screens. Both phones are displaying the TikTok app interface with the time '18:27' and '18:23' and the URL 'tiktok.com' at the top. The left phone screen shows the 'Guardian's Guide' section, which features a large image of four people and the text 'Hello and welcome! We know that you, as caregivers, want to help your teens learn about digital safety so they can manage their online presence, both now and as they grow into adulthood. This Guardian's Guide is designed to provide an overview of TikTok and the many tools and controls we've built into the product to keep our community safe. The guide also provides general...'. The right phone screen shows the 'Online safety: 5 tips from teens' section, which features the text 'At TikTok, we are committed to working in partnership with parents and caregivers as you support your teen's digital journey. Parents tell us it can feel overwhelming to keep up with evolving trends and new platforms, so we want to help simplify things by offering parents insight on the support teens really value from trusted adults—and who better to advise on what they need than teens themselves! This is what they told us: "Help me understand the rules" Teens don't expect trusted adults to be experts on every platform, but they value support to set up their accounts. This includes...'. The right edge of the image has a vertical text 'CONFIDENTIAL & PROPRIETARY'.

Ongoing and Future Efforts

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Minor Safety Risk Assessment (Art 34(1)(d))

Divided into three tailored interlinked modules:

- 1 Age Assurance**
- 2 Age appropriate content (focus on consumption)**
- 3 Engagement risks (focus on settings and engagement)**

Roadmap

H1 2023

- 1 Screen time defaults and insights
- 2 Refresh your For You Feed
- 3 Content filtering tool in Family Pairing
- 4 Restricted Mode improvements

H2 2023

- 5 Further investment in age assurance detection measures
- 6 Exploratory consideration of age estimation software
- 7 Further investments in Content Levels and digital agency
- 8 Forming our Youth Council (announced in H1)

You have just heard: Youth Safety at TikTok

Up next: Final Remarks

Q&A and Close

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thanks.

Exhibit 4

TikTok Technology Limited

Office Address

C/O Wework
5 Harcourt Road
Dublin
D02 FW64

11 August 2023

Dear [Redacted]

Follow up from Meeting on 17 July between the Commission and TikTok to discuss TikTok's readiness to comply with the Digital Services Act (the 'Readiness Assessment')

I would like to take the opportunity to thank you and your team for travelling and for your valuable time during the Readiness Assessment. I hope that the Readiness Assessment highlighted TikTok's commitment to the DSA, the significant resources dedicated to the DSA programme, and TikTok's clear intention to be a compliant Very Large Online Platform.

We have carefully considered the feedback that you kindly gave us about our new illegal content reporting user experience. We strive to make sure that our user solutions are compliant and easy to use. With these objectives in mind, I can confirm that we are going to make a change to our user experience as a result of your feedback. We will continue to ask users to supply any information that they can about what law they believe has been infringed by the content that they are reporting. However, we will no longer make this a mandatory requirement, so that users can submit their report without completing this information.

We can also now respond to the follow ups that you asked for in the course of our meeting:

1. Please find attached a copy of all of the slides that we presented during the Readiness Assessment.
2. During the meeting you have requested the link to the demonstration of the Commercial Content Library (CCL). We launched the CCL shortly after the Readiness Assessment, so we are able to provide you with the link to the demo presented in the Readiness Assessment, and the additional communication and information now that the CCL is live:

TikTok Technology Limited

A private company limited by shares, registered in Ireland with company number 635755

Registered Office: 10 Earlsfort Terrace, Dublin D02 T380

Directors: [Redacted]

- a. Blog post covering the demonstration of the CCL and TikTok's Brand Safety initiatives: <https://www.tiktok.com/business/en-GB/blog/beyond-brand-safety>;
- b. A direct link to the CCL:
https://library.tiktok.com/ads?region=GB&start_time=1664578800000&end_time=1690276467462&adv_name=&adv_biz_ids=&query_type=&sort_type=impression_desc;
- c. Help Centre article explaining how to use and the functionalities within the CCL:
<https://support.tiktok.com/en/account-and-privacy/personalized-ads-and-data/commercial-content-library>;

3. A link to the Help Centre article explaining how TikTok's recommender system functions which was published on 7 July: <https://support.tiktok.com/en/using-tiktok/exploring-videos/how-tiktok-recommends-content>; and
4. Please find attached a non-paper covering TikTok's approach to election preparedness across the EU, including a case-study on the forthcoming Slovak parliamentary elections.

We look forward to meeting with our new supervisory team after Day 1 and to continuing to engage with the Commission on an open and collaborative basis.

Kind regards,

Redacted

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Redacted

Exhibit 5

ANNEX II

TikTok

Risk Assessment Guidelines

Adopted by the TikTok Technology Limited Board: 25 August 2023

SECTION 1 - INTRODUCTION

1. Further to TikTok's Online Safety Risk Management Policy Framework, these Guidelines on TikTok's risk assessment process ("Risk Assessment Guidelines" or "Guidelines") have been developed to assist TikTok to conduct the risk assessment process under the Digital Services Act ("DSA") in a diligent manner, and to ensure that the risk assessment process follows a consistent, methodical, proportionate and balanced approach.
2. These Guidelines have been prepared based on TikTok's interpretation of the high-level and principles-based requirements contained in Art. 34 of the DSA (and the relevant recitals), informed by relevant risk management standards,¹ and based on what TikTok considers to be appropriate in the specific context of the DSA.
3. These Guidelines refer to "systemic risk" as that term is used in Art. 34(1) of the DSA.
4. In accordance with the Art. 34(1) of the DSA, risk assessments ("Risk Assessments") will be conducted on an annual basis (and no later than 28 August in a given year), save where the deployment of new functionalities in the EU that are likely to have a critical impact on the risks identified (and TikTok will develop separate guidelines on the assessment of risk in such scenarios).
5. Each version of a Risk Assessment will clearly indicate the time period that it covers, except for the first versions of the Risk Assessments (which are a baseline version, reflecting the position at or shortly prior to 28 August 2023). In accordance with Recital 85 of the DSA, this should also help to make it possible for subsequent Risk Assessments to build on each other and show the evolution of the systemic risks identified over time.

SECTION 2 - DUE DILIGENCE IN THE RISK ASSESSMENT PROCESS

6. **Due Diligence Requirement:** To ensure that systemic risks are diligently identified, analysed and assessed in accordance with the requirements of Art. 34(1) of the DSA, the risk assessment process should meet the following requirements (which are together referred to as the "Due Diligence Requirement"):²

6.1	involve careful, in-depth and thorough consideration of the factors considered relevant to each systemic risk, including as they specifically relate to the TikTok platform (the "Platform");
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¹ Note: Such as ISO 31000.

² Note: In line with other EU laws, we anticipate that the interpretation of what constitutes "diligent" action will evolve over time informed by regulatory expectations and with market practice. For example, the term "professional diligence" as used in the Unfair Commercial Practices Directive refers to "*honest market practice and/or the general principle of good faith in the trader's field of activity...*".

6.2	involve assessing systemic risks in discrete risk assessment modules (“ Modules ”), as appropriate, to ensure each systemic risk is assessed in-depth and receives a sufficiently detailed, targeted and proportionate assessment; ³
6.3	follow a methodical approach, documented using the template form of risk assessment Module (or a materially similar form) (“ Template ”) (as included at Appendix A of these Guidelines);
6.4	involve a balanced and proportionate approach to each systemic risk identified, including by taking appropriate account of relevant fundamental rights and interests, in particular data protection, and the rights to freedom of expression and information; ⁴ and where relevant, the best interests of the child; ⁵ and
6.5	involve consultation with, and input from, suitably qualified internal subject matter experts whose expertise is relevant to the systemic risk.

SECTION 3 - REQUIREMENTS FOR EACH STAGE OF THE RISK ASSESSMENT PROCESS

7. **Systemic risks:** Reflecting the Due Diligence Requirement, by reference to the criteria set out in Art. 34(1) of the DSA, TikTok shall first undertake a scoping exercise to:

7.1	define the scope of each category of systemic risk, having regard to relevant EU laws, including the Charter of Fundamental Rights of the European Union (“ Charter ”), member state laws, international instruments, and/or case law (the conclusion of which should be documented in Section A1 of the Template); and
7.2	organise Modules accordingly, having regard to scope/definition of each systemic risk, and manner in which TikTok’s teams are structured in relation to the relevant category of systemic risk.

8. **Risk identification:** Reflecting the Due Diligence Requirement, and using Section A of the Template, for each systemic risk the risk identification phase should involve:

8.1	a consideration of internal sources/factors relevant to identification of the risk;
8.2	a consideration of external sources/factors relevant to the identification of the risk;
8.3	an assessment of existing risks ;
8.4	an assessment of potential emerging risks (or subsets of the existing risk); and

³**Note:** Per recital 80 DSA: “Four categories of systemic risks should be assessed in-depth by the providers of very large online platforms and of very large online search engines.”

⁴ **Note:** Per recital 90 DSA: “In the assessment on whether a measure is reasonable, proportionate and effective, special consideration should be given to the right to freedom of expression.”

⁵ **Note:** Article 3.1 of the United Nations Convention on the Rights of the Child, and Article 24(2) of the EU Charter (“In all actions concerning children, whether undertaken by public or private social welfare institutions, courts of law, administrative authorities or legislative bodies, the best interests of the child shall be a primary consideration.”)

8.5	taking account of the regional and linguistic aspects of the use made of the Platform within the EU, and whether/how this impacts on the relevant risk.
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9. **Risk analysis and assessment:** Reflecting the Due Diligence Requirement, and using Sections B to E of the Template, for each risk, the risk assessment phase should involve:

9.1	an assessment of the level of risk, including the severity and probability* of the risk, <i>before</i> any mitigation measures are put in place ("Inherent Risk") (to be documented in Section A4 of the Template).
	<i>*The severity and probability are to be assessed using the methodology set out in Appendix B of these Guidelines.</i>
9.2	an assessment of each of the risk factors listed in Art. 34(2) of the DSA, as set out in Sections B to E of the Template, and the extent to which they impact the relevant risk (either by aggravating or mitigating the risk);
9.3	to the extent not covered in subsection 9.2 above, an assessment of any other relevant risk-mitigation measures;
9.4	documenting TikTok's engagement with suitably qualified external stakeholders to obtain specialist insight and knowledge and other perspectives, and to test the assumptions of internal teams regarding the risk (to be documented in Section D of the Template), and which may include, as appropriate to the context: <ul style="list-style-type: none"> • independent experts and researchers; • civil society organisations; and/or • representatives of users of the Platform.
9.5	an assessment of the level of risk, including the severity and probability* of the risk, <i>after</i> considering and implementing relevant reasonable, proportionate and effective mitigation measures (the "Residual Risk") (to be documented in Section F4 of the Template).
	<i>*The severity and probability are to be assessed using the methodology set out in Appendix B of these Guidelines.</i>

10. **Risk mitigation:** Separate to the risk assessment phase (above), reflecting the Due Diligence Requirement, and using the Risk Mitigation Assessment template (as included at Appendix C of these Guidelines, or materially similar form), the risk mitigation phase should involve for each Risk Assessment:

10.1	for each of the potential mitigation measures listed in Art. 35(1)(a) to (k) of the DSA: <ul style="list-style-type: none"> • if implemented, a summary description of the relevant mitigation measures implemented; or • if not implemented, an explanation as to why such measures were not implemented (which may include an assessment as to why such measure(s) were not considered to be reasonable, proportionate and effective mitigation measures to the specific risk(s) identified);
10.2	a description of any other risk mitigation measures beyond those listed in Art. 35(1)(a) to (k) of the DSA; and
10.3	in assessing whether the mitigation measures put in place by TikTok are reasonable, proportionate and effective for mitigating risks, a consideration of the risks concerning the exercise of fundamental rights.

SECTION 4 - SUPPORTING DOCUMENTS

11. **Identifying supporting documents:** As part of the completion of the Risk Assessment review process, the Compliance function shall ensure that the relevant supporting documents and materials (“**Supporting Documents**”) upon which the Risk Assessment is based are identified in writing. While the types of Supporting Documents may vary having regard to the nature and context of each risk, the following criteria should be used to guide the identification of relevant Supporting Documents:

11.1	Internal policy documentation relevant to the risk assessment process: This includes: <ul style="list-style-type: none"> • Online Safety Risk Management Policy Framework; • Risk Assessment Guidelines; • Risk Assessment Review Group Terms of Reference; and • Online Safety Oversight Committee Terms of Reference.
11.2	Risk Mitigation Assessment: The completed Risk Mitigation Assessment for each Risk Assessment.
11.3	Terms and conditions: The current versions of the Terms of Service, Community Guidelines, and any other relevant documents that form part of the Terms and Conditions.
11.4	Other policy documents: Other policy documents relevant to the risk, as

	referenced in the Risk Assessment.
11.5	Training materials: Relevant training materials, as referenced in the Risk Assessment.
11.6	Media literacy/user awareness-raising measures: Copies of relevant media literacy or awareness-raising measures, as referenced in the Risk Assessment.
11.7	Relevant supporting data/metrics: Relevant supporting data/metrics, as contained in the Risk Assessment (including a copy of the underlying data if available).
11.8	Other relevant supporting materials: Other relevant supporting materials, as referenced in the Risk Assessment.

12. **Retention of supporting documents:** Having identified the supporting documents, the Compliance function will ensure that true copies are securely retained for a period of 3 years from the date of completion of the Risk Assessment (or as soon as is feasible thereafter).
13. **Limited time period for Supporting Documents:** The Supporting Documents are to be retained “as is” at or around the date of completion of the relevant Risk Assessment in order to support the position as reflected in that version of the Risk Assessment. Accordingly, the Supporting Documents will necessarily reflect the position at a particular moment in time, and should not be relied upon as a basis to assess the position beyond that time period, because the Supporting Documents (in the format in which they are retained) may not be up-to-date.

SECTION 5 - RISK ASSESSMENT GOVERNANCE & REPORTING

14. **Risk assessment review process:** Following material completion of a Risk Assessment, the following steps are to be taken:
 - 14.1. **Compliance function review and approval:** Having taken subject matter expert input and advice from the Risk Assessment Review Group (“RARG”) in accordance with the RARG Terms of Reference, the Head of the Compliance function will provide final review and approval of the Risk Assessment; and
 - 14.2. **Online Safety Oversight Committee (“OSOC”):** Following the Compliance function review and approval, the Head of the Compliance function will notify the findings of the Risk Assessment to the OSOC in accordance with the Online Safety Oversight Committee Terms of Reference.
15. **External reporting:** In accordance with the timelines referenced in Art. 42(4) of the DSA, the Head of the Compliance function will:

- 15.1. In accordance with Art. 42(4)(a) and (b) of the DSA, compile a report containing the results of the Risk Assessments (the “Report”) and submit it for approval to the board of directors of TikTok Technology Limited for its consideration and approval;
- 15.2. transmit the Report to the European Commission and to the Digital Services Coordinator of establishment; and
- 15.3. make the same materials publicly available (subject to the provisions of Art. 42(5) of the DSA, pertaining to disclosure of confidential information).

SECTION 6 - OWNERSHIP, REVIEW & UPDATES TO THESE GUIDELINES

16. These Guidelines are to be owned by the Compliance Officer, who will be responsible for ensuring that these Guidelines are kept under periodic review at least once per year (not later than 28 August in a given year).
17. It may be necessary and appropriate to review these Guidelines more frequently and to make updates and amendments to these Guidelines to take account of changes to applicable legal frameworks, regulatory guidance⁶ and for operational reasons. Prior to making any material updates/amendments, the relevant personnel shall be consulted, and any such changes shall be subject to the approval of the Compliance Officer and the board of directors of TikTok Technology Limited and notified to the OSOC.⁷

⁶ **Note:** In particular, any such updates should take account of any relevant regulatory guidance, including reports on the identification and assessment of the most prominent and recurrent systemic risks best practices to mitigate the systemic risks published in accordance with Art. 35(2) or (3) of the DSA.

⁷ **Note:** Art. 41(6) of the DSA states: “*The management body shall approve and review periodically, at least once a year, the strategies and policies for taking up, managing, monitoring and mitigating the risks identified pursuant to Article 34 to which the very large online platform or the very large online search engine is or might be exposed to.*”

APPENDIX A
RISK ASSESSMENT MODULE TEMPLATE

RISK ASSESSMENT: [X]
MODULE [X]:

Risk [X]	[Risk heading]
A. Risk identification and description: In this Section A, we set out:	
	<ul style="list-style-type: none"> • A1: Scope of systemic risk; • A2: Description of systemic risk; • A3: How the risk may manifest on the Platform; • A4: Approach to risk identification; • A5: Linguistic and regional aspects in risk identification; and • A6: Assessment of the inherent risk (i.e. without any controls in place).
A1. Scope of systemic risk:	
A2. Description of systemic risk:	
A3. How the risk may manifest on the Platform:	
A4. Approach to risk identification:	
Section A5: Linguistic and regional aspects in risk identification:	
A6. Assessment of the inherent risk without any controls in place: ⁸	<p>Severity of harm:</p> <hr/> <p>Probability of harm:</p> <hr/> <p>Overall inherent risk: (Severity x Probability = Inherent risk rating)</p>

⁸ Note: The risk assessment scores should be read together with the Risk Assessment Guidelines (in particular, having regard to the Notes in Appendix B), and should not be taken out of context. In particular, it should be noted that the inherent risk score is based on a hypothetical/counterfactual scenario if no risk mitigations were in place.

B. Terms, enforcement, content moderation systems, and specialist teams and resources: In this Section B, we assess the systemic risk relating to [insert relevant risk] in light of the following factors:

- B1: TikTok's Terms of Service and Community Guidelines, and their enforcement;
- B2: TikTok's content moderation systems; and
- B3: TikTok's specialist teams and resources.

B1. Terms of Service / Community Guidelines:	
B2. Content moderation systems:	
B3. Specialist teams and resources:	

C. Platform-specific and other relevant factors: In this Section C, we assess the systemic risk relating to [insert relevant risk] in light of the following factors:

- C1: TikTok's Recommender system and other algorithms;
- C2: Platform design and features;
- C3: The risk of intentional manipulation / inauthentic use / automated exploitation of the service;
- C4: The virality risk (i.e. amplification and potentially rapid and wide dissemination);
- C5: TikTok's systems for selecting and presenting advertisements;
- C6: TikTok's data related practices;
- C7: Specific regional or linguistic aspects of TikTok's approach;
- C8: TikTok's training and awareness-raising measures;
- C9: Media literacy and awareness-raising measures; and
- C10: Any other relevant factors.

C1. Recommender system and other algorithmic systems:	
C2: Relevant Platform features / functions:	
C3. Risk of intentional manipulation / inauthentic use / automated exploitation:	

C4. Virality risk (i.e. amplification and potentially rapid and wide dissemination of illegal content):	
C5. Systems for selecting and presenting advertisements:	
C6. Data related practices:	
C7. Specific regional or linguistic aspects:	
C8. Training and awareness measures:	
C9. Media literacy and awareness-raising measures:	
C10. Any other relevant factors:	

D. External stakeholder engagement: In this Section D, we set out details of TikTok's external stakeholder engagements with:

- D1. NGOs / civil society / independent experts;
- D2. Government / regulatory authorities;
- D3. Law enforcement authorities; and
- D4. Trusted Flaggers.

D1. NGOs / civil society / independent experts:	
D2. Government / regulatory authorities:	
D3. Law enforcement authorities:	
D4. Trusted Flaggers:	

E. Freedom of expression assessment: In this Section E, we assess the impact on freedom of expression of the various measures implemented to tackle [insert relevant risk], and consider whether such measures are reasonable, proportionate and effective.

E1. Freedom of expression assessment:	
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Section F. Conclusion of risk assessment: This Section F sets out:

- F1: Assessment of mitigations in place;
- F2: Supporting data/evidence;
- F3: Further recommendations; and
- F4: Assessment of the residual risk.

F1. Assessment of mitigations in place:	
F2. Supporting data / evidence:	
F3. Further recommendations:	
F4. Assessment of the residual risk (after risk-mitigation measures put in place):	Severity of harm: Probability of harm: Overall residual risk:

APPENDIX B

METHODOLOGY FOR RISK SCORING

PART 1 - INTRODUCTION

The purpose of this methodology (“**Methodology**”) is to help set out a consistent and clear approach when, as part of the risk assessment process, TikTok is assessing both the severity and probability of risk, and applying an Overall Risk Score for each risk. The Methodology should be used to assess the severity and probability of both:

- **Inherent Risk:** i.e. the level of risk before risk-mitigations are put in place (in Section A of the Risk Assessment); and
- **Residual Risk:** having assessed the relevant risk-mitigation measures (throughout Sections B to E of the Risk Assessment), the level of risk after the relevant risk-mitigations have been put in place (in Section F of the Risk Assessment).

NOTES ON METHODOLOGY

Note 1: This Methodology has been prepared by TikTok based on TikTok’s interpretation of the high-level principles-based requirements contained in Art. 34 of the DSA (and the relevant recitals), informed by relevant risk management standards and based on what TikTok considers to be appropriate in the specific context of the DSA. This exercise has been undertaken in the absence of specific regulatory guidance or other authoritative guidance on how the risk assessment process should be conducted in the specific context of the DSA.

Note 2: Given the diverse nature, scope, and context of the risks to be assessed in the specific context of the DSA, there is a high level of complexity and subjectivity in the risk assessment process. This arises in particular from: (i) challenges in identifying and quantifying clear causal links between multiple potential causes and effects for a risk; and (ii) divergent perspectives on balancing of risk factors, including the careful consideration of fundamental rights at scale, and seeking to strike an appropriate and proportionate balance where fundamental rights may be in conflict. Therefore, a degree of flexibility is necessary in the application of this Methodology. To ensure transparency, when exercising judgement and discretion, the rationale/basis should be clearly documented in the relevant sections of the Risk Assessment.

Note 3: This Methodology has been developed for the limited and specific purpose of the DSA risk assessment process. Any Inherent Risk, Residual Risk, and Overall Risk scores contained in Risk Assessments resulting from the application of this Methodology are therefore specific to the DSA, how the Platform operates in the EU/EEA, and the Risk Assessment for the relevant time period it covers; and they should not be relied upon beyond that limited context. For the avoidance of doubt, it would not be appropriate or reliable to seek to rely on any risk scores resulting from the Methodology for any other regulatory or litigation purposes, either within or outside of the EU. In addition, the risk scorings should not be relied on in isolation, but rather should be considered and understood in the context of the entirety of the relevant Risk Assessment, these Guidelines, and the definitions contained herein.

PART 2. OVERVIEW OF RISK SCORING

The formula for calculating the **Overall Risk Score** for each risk is as follows:

$$\text{(Severity of harm)} \times \text{(Probability of harm)} = \text{Overall Risk Score}$$

This formula should be applied for both the Inherent Risk (in Section A of the Template) and the Residual Risk (in Section B of the Template):

Severity of harm	Probability of harm	Overall
High	Highly Likely	High
Material	Likely	Material
Moderate	Possible	Moderate
Low	Unlikely	Low
Very Low	Highly unlikely	Very Low

		SEVERITY OF HARM:				
		Very Low	Low	Moderate	Material	High
PROBABILITY OF HARM:	Highly Likely	Low	Moderate	Material	High	High
	Likely	Low	Moderate	Moderate	Material	High
	Possible	Very Low	Low	Moderate	Moderate	Material
	Unlikely	Very Low	Very Low	Low	Moderate	Moderate
	Highly unlikely	Very Low	Very Low	Very Low	Low	Low

PART 3 - APPLYING THE METHODOLOGY

In applying the Methodology, it is necessary to balance consideration of reasonable worst-case scenarios (in line with risk management principles), with a proportionate assessment of each risk (as required by the DSA),⁹ and it is important to emphasise that the risk assessment process is intended to assess “systemic risks” (i.e. at large-scale affecting society-at-large rather than isolated or one-off risks).¹⁰ Accordingly, in order to assess potential systemic risks, the scale of the risk is a key factor. In addition, given that risks may occur in various forms - for instance, a single systemic risk could manifest in several different ways each of which may have varying severity levels - the Methodology contains a degree of flexibility in setting scoring ranges. This approach is intended to facilitate a reasonable and balanced assessment of each systemic risk, rather than an overly mechanical approach, which could result in a less accurate assessment.

STEP A: ASSESSING SEVERITY OF THE HARM:		
Factors	Description	Relevant criteria
Factor 1:	<ul style="list-style-type: none">Nature of the harm if the risk materialises (including any special characteristics of affected individuals, such as whether they are minors).	<p>The extent to which the risk/harm involves:</p> <ul style="list-style-type: none">A threat to the life or physical safety of one or more persons (e.g., death, injury, other serious physical harm);Material psychological impact (e.g. serious distress, or intimidation); orMajor societal impact (such as impact on an election or other event of substantial importance). <p>The assessment should also include consideration of special characteristics of affected individuals, such as whether they may be vulnerable users, such as minors or whether the harm involves</p>

⁹ Note: Per Art. 34(1) of the DSA: “... *This risk assessment shall be specific to their services and proportionate to the systemic risks, taking into consideration their severity and probability, [...]*”.

¹⁰ Note: Per Recital 76 of the DSA: “*Very large online platforms and very large online search engines may cause societal risks, different in scope and impact from those caused by smaller platforms.*”.

¹¹ Note: Per Recital 79 of the DSA: “*In determining the significance of potential negative effects and impacts, providers should consider the severity of the potential impact and the probability of all such systemic risks. For example, they could assess whether the potential negative impact can affect a large number of persons, its potential irreversibility, or how difficult it is to remedy and restore the situation prevailing prior to the potential impact.*”

		discrimination (based on protected characteristics). ¹²
Factor 2:	<ul style="list-style-type: none"> Scale of the harm in terms of number of individuals likely impacted. 	The scale of the impacted number of persons within the EU.
Factor 3:	<ul style="list-style-type: none"> Likely duration, reversibility of the harm or difficulty to restore the prevailing situation. 	<p>The extent to which the impact of the risk/harm is:</p> <ul style="list-style-type: none"> • Fully irreversible; • Long-term (i.e. take significant time or effort to remedy and restore the situation prevailing prior to the potential impact); • Likely to last for a period of weeks; or • Likely to last a matter of hours or days until it is remedied and the situation is restored to that which prevailed prior to the potential impact.

STEP B: ASSESSING THE PROBABILITY OF THE HARM		
Factors	Description	Relevant criteria
Factor 1:	<ul style="list-style-type: none"> Previous/recent occurrence of the harm on the Platform (primary factor), and on other online platforms (based on publicly available information)(secondary factor), having regard to the relevant volumes; and 	<ul style="list-style-type: none"> • On-platform: on the Platform (based on transparency reporting, and relevant internal metrics) in the past 12 months; and • Off-platform: on other online platforms (based on publicly available information, such as transparency reporting) in the past 12 months.
Factor 2:	<ul style="list-style-type: none"> Other factors that impact the probability of the harm occurring in future. 	A range of other factors may impact the probability of the harm occurring in future, including but not limited to:

¹² Note: Recital 62 DSA. Having regard to the Article 21(1) of the Charter of Fundamental Rights of the European Union: "Any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited."

	<ul style="list-style-type: none"> *Previously unforeseen events, such as a terrorist attack (including anniversaries), a war/conflict, a natural disaster or public emergency, or situations of civil or political unrest; *Scheduled events, such as elections or referendums, and other major events (such as international sports tournaments). <p><i>*TikTok should have regard to its Global Risk Calendar for such purposes.</i></p>
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STEP C: COMPILING THE RESULTS OF THE RISK ASSESSMENTS (IN ACCORDANCE WITH 15.1 ABOVE)

- Overview:** This step involves the summarisation by the Compliance function of the detailed analysis and conclusions in the Risk Assessments as well as (due to its external audience) any further relevant factual or background information about TikTok:

Step	Description	Relevant criteria
1.	<ul style="list-style-type: none"> Collating the material information from each Risk Assessment module: 	<ul style="list-style-type: none"> RARG inputs: This summary will include the material inputs from RARG that are relied upon; and Overall risk scores: Produced by steps A and B above in relation to inherent and residual risks.
2.	<ul style="list-style-type: none"> Classification of each Risk Assessment into a Tier to reflect TikTok' ongoing treatment of each risk: <p><i>Note: This classification draws on the concepts of severity and probability to inform the prioritisation of risks.</i></p>	<p>The criteria for each Tier, which are:</p> <ul style="list-style-type: none"> Tier 1: The highest overall risk scores and/or where the risks are highly dynamic in nature and require close monitoring and ongoing specialist resource; Tier 2: Lower overall risk scores and/or where the risks are not highly dynamic, but which nevertheless due to their nature still require close monitoring and

		<p>the potential for specialist resource; or</p> <ul style="list-style-type: none"> ● Tier 3: The lowest overall risk scores and/or where the risks are not highly dynamic, but which still require monitoring.
3.	<ul style="list-style-type: none"> ● Drafting the Report in accordance with Art. 42(4) of the DSA, which will comprise several elements: 	<ul style="list-style-type: none"> ● Executive summary: From the Head of the Compliance function providing any necessary factual background and outlining the process followed to conduct the Risk Assessments; ● The results of the Risk Assessments: Presented as an overview of each risk, the issues that were determinative in assessing the risk and the resulting Tier for systemic risks; and ● Administration: A section on how to read and use the Report.

APPENDIX C

RISK MITIGATION ASSESSMENT - TEMPLATE

The purpose of this risk mitigation assessment (“**Risk Mitigation Assessment**”) is to facilitate TikTok in diligently identifying and assessing risk mitigation measures by reference to Art. 35(1) of the DSA. An important part of this process is to ensure that risk-mitigation measures are reasonable, proportionate and effective for mitigating relevant risks, including particular consideration of any impacts on the exercise of fundamental rights (in particular freedom of expression and information, and data protection and privacy rights).

Instructions	
<p>For each risk-mitigation measures listed:</p> <ul style="list-style-type: none">• if implemented, include a summary description of the relevant mitigation measures implemented; or• if not implemented, an explanation as to why such measures were not implemented (which may include an assessment as to why such measure(s) were not considered to be reasonable, proportionate and effective mitigation measures to the specific risk(s) identified).• in assessing whether the mitigation measures put in place by TikTok are reasonable, proportionate and effective for mitigating risks, a consideration of the risks concerning the exercise of fundamental rights.	
<p>Risk Assessment:</p> <p>Each of the following risk-mitigation measures are to be assessed as relevant (as listed in Art. 35 of the DSA):</p> <ul style="list-style-type: none">• A: Adaption of feature or platform design, including online interfaces• B: Adaption of terms and conditions and their enforcement;• C: Adaption of content moderation processes;• D: Testing and adaption of algorithmic systems, including recommender systems• E: Adaption of advertising systems• F: Reinforcing risk detection measures• G: Cooperation with trusted flaggers• H: Cooperation with other platforms through the codes of conduct / crisis protocols;• I: Awareness-raising measures• J: Targeted measures to protect the rights of the child• K: Measures around labelling of manipulated content; and• L: Other relevant risk mitigation measures (beyond those listed in Art. 35 DSA).	
A. Adaptation of feature or platform design	

including online interfaces: ¹³	
B: Adaption of terms and conditions ¹⁴ and their enforcement:	
C: Adoption of content moderation processes: ¹⁵	
D: Testing and adaption of algorithmic systems, including recommender systems: ¹⁶	
E: Adaption of advertising systems:	
F: Reinforcing risk detection measures:	
G: Cooperation with trusted flaggers:	
H: Cooperation with other platforms through the codes of conduct/crisis protocols:	
I: Awareness-raising measures:	
J: Targeted measures to protect the	

¹³ **Note:** Per Art. 3(m): 'online interface' means any software, including a website or a part thereof, and applications, including mobile applications.

¹⁴ **Note:** Per Art. 3(u): 'terms and conditions' means all clauses, irrespective of their name or form, which govern the contractual relationship between the provider of intermediary services and the recipients of the service.

¹⁵ **Note:** Art. 3(t): 'content moderation' means the activities, whether automated or not, undertaken by providers of intermediary services, that are aimed, in particular, at detecting, identifying and addressing illegal content or information incompatible with their terms and conditions, provided by recipients of the service, including measures taken that affect the availability, visibility, and accessibility of that illegal content or that information, such as demotion, demonetisation, disabling of access to, or removal thereof, or that affect the ability of the recipients of the service to provide that information, such as the termination or suspension of a recipient's account;

¹⁶ **Note:** Art. 3((s)) 'recommender system' means a fully or partially automated system used by an online platform to suggest in its online interface specific information to recipients of the service or prioritise that information, including as a result of a search initiated by the recipient of the service or otherwise determining the relative order or prominence of information displayed;

rights of the child:	
K: Measures around labelling of manipulated content:	
L: Other relevant risk mitigation measures (beyond those listed in Art. 35 of the DSA):	

Exhibit 6

TikTok Technology Limited's response to Section I of RFI
(Ref.Ares(2023)7112552 - 19.10.2023)
4 November 2023

Introduction

1. In this document, TikTok Technology Limited sets out its response to **Section I** of the Commission's request for information (Ref.Ares(2023)7112552 - 19/10/2023) (the "**RFI**").
2. TikTok understands both the significance and sensitivity of the Israel-Hamas conflict. Indeed, the conflict, and commentary about it, illustrates the challenges inherent in successfully engaging in content moderation of violative content at scale while at the same time ensuring that the fundamental rights and freedoms of European citizens are respected and protected as required by Art 14(4) DSA.
3. The DSA requires TikTok, as a VLOP, to "*identify, analyse and assess any systemic risks in the Union stemming from the design or functioning of their service and its related systems, including algorithmic systems, or from the use made of their services*" (Art 34(1) DSA) and in doing so to consider risks associated with negatively impacting fundamental rights and freedoms (Art 34(1)(b) DSA). TikTok completed this exercise by its DSA Day 1 (28 August 2023). TikTok remains willing to meet the Commission to discuss its resulting Risk Assessment Report ("**RAR**"), filed pursuant to Art 42(4)(a) DSA, and the risk assessments that underlie the RAR. Indeed, we consider that such a meeting would be a good starting point for a structured, and timely, dialogue of TikTok's risk assessment process and outcomes.
4. The DSA also requires TikTok to publish a transparency report ("**TR**") (Art 42(1)), providing information on, among other things, details on and data relating to: content moderators, automated content moderation measures, and content removals pursuant to Art 16 DSA. TikTok published its first TR on 25 October 2023, and we note that certain of the questions in the RFI relate to information contained within the TR.
5. TikTok understands that:
 - a. Some of the questions below are directed at understanding what procedures and/or policies that TikTok has in place to respond to a *specific* escalation in illegal content arising from a geopolitical event or humanitarian crisis (crisis response), in this case the Israel-Hamas conflict.
 - b. Many of the questions seek information about this specific crisis event and the response taken to it, rather than to be directed at the systemic risks and associated risk assessments and mitigations.
6. In light of these points, TikTok reserves its position as to the appropriateness of certain of the questions raised by the Commission. However, appreciating that this is an area of concern for the Commission, in the spirit of cooperation, and acting in good faith, TikTok has sought to address the Commission's queries to the best of its ability, in the short time available. In terms of the points raised below, these are intended to allow the Commission to understand how the

approach to the RFI has been perceived by TikTok and in an effort to reduce the risk of misunderstandings. These points are as follows:

- a. The requests anticipate disclosures of information which have already been disclosed either publicly or to the Commission directly (which the DSA already contemplates), but on an unnecessarily expedited timeline. For example, information which is responsive to certain of the requests is contained within the RAR and the TR.
- b. The requests relate to specific examples of risks crystallising rather than to systemic risks and their mitigation in the European Union. For VLOPs, the DSA sets requirements and expectations for systems and processes; it does not prescribe obligations for, or examine the position in relation to, specific pieces of content. TikTok is also cognisant of the requirement to balance addressing systemic risks and attendant mitigations with the provisions of Art 8 DSA, which provides that platforms are not under any general monitoring obligation. Accordingly, while this specific crisis might be a good case study for illustrating TikTok's approach to the relevant systemic risks, we query whether it is appropriate or necessary for it to be assessed in isolation and whilst the crisis is still unfolding. Instead, this particular crisis could have been discussed as part of a structured dialogue in respect of the relevant systemic risks/risk assessments, once the crisis had abated.
- c. The Commission's approach has necessitated the collation of detailed information whilst events are ongoing. We think it important to highlight that the personnel with the information required to answer the questions raised by the Commission will necessarily be heavily involved on the front-line of the response to such a crisis. Seeking detailed information from such an environment is, accordingly, not straightforward.
- d. We note that the RFI asks questions based on the RAR as well as on the letters exchanged between the Commissioner and TikTok's CEO, and TikTok's newsroom post on the conflict. TikTok's response to the Commissioner, provided in a 24 hour period, was stated on its face to not form part of TikTok's official correspondence. TikTok has responded to the questions based on these communications but we take the view that these were not created in the context of a regulatory obligation and would be grateful to confirm your understanding in due course.

7. TikTok understands that the Commission's position is that it is not yet able to ascertain TikTok's compliance with the provisions of the DSA stated in the RFI. TikTok takes this concern very seriously. While we have done our best to respond in the time given, the timescales have been very challenging given the size and complexity of the request (in particular where various questions pertain to an evolving situation). We would be grateful for the opportunity to discuss future timescales to ensure TikTok is accorded due process.

I. As regards the obligations stemming from Regulation (EU) 2022/2065 in the context of the Hamas-Israeli conflict (compliance with Article 16(6), 34 and 35(1) of Regulation (EU) 2022/2065)

In the news item published on 15 October 2023, TikTok lists its “*continued actions to protect the TikTok community during the Israel-Hamas war*” (hereinafter referred as “TikTok’s statement on continued actions to protect the TikTok community during the Israel-Hamas conflict”) (8).

In responding to the questions under this subsection, please do not limit your reply to the situation at the time of submitting your response, but provide details on any changes which you may have implemented since 7 October 2023 (e.g., any change in organisation set up or increase/decrease in resources from the 7 October 2023 to the date of your response to this request for information).

A. Questions related to “crisis management process” (9) put in place in the context of the Hamas-Israel conflict.

1. In TikTok’s response of 13 October to Commissioner’s Breton’s letter of 12 October 2023, it is stated that TikTok engaged its “*crisis situation protocols*” immediately when it learned of the attack by Hamas, with 24/7 control rooms being established to monitor and address the emerging crisis. Please provide information and underlying internal documents related to the following questions:

i. When was the “*crisis management process*” (or crisis protocols) activated and for which duration (if already determined)?

1. As mentioned in TikTok’s RAR, TikTok has a comprehensive crisis management plan to address unforeseen challenges. TikTok maintains a dedicated incident management (“IM”) team within TikTok’s Trust & Safety team to address urgent issues and to contain and minimise harm. As part of this crisis management plan, a crisis manager is identified. This person has overall responsibility for the handling of the crisis for IM. The crisis manager’s main responsibilities are to coordinate IM resources, notify leadership where required and ensure active cross-functional updates across all command centre functions. Please see our responses to **question A.2** for additional details on the role and composition of the command centre.

TikTok’s Crisis Response Protocol

2. TikTok has a Crisis Management Playbook detailing a series of recommended standard operating procedures in relation to crisis scenarios, which is managed in six separate phases:

Phase 0: Detection

Phase 1: Triaging & Readiness (where applicable)

Phase 2: Activation

Phase 3: Response

Phase 4: De-escalation & Recovery

Phase 5: Closure

Application of TikTok's Crisis Protocol to the Israel-Hamas Conflict

3. The above crisis response protocol has been, and is currently being, applied to the Israel-Hamas conflict, as the crisis continues to unfold. In particular, the relevant crisis response protocol phases were activated as follows:
 - a. Following the first attack perpetrated by Hamas in the morning of 7 October 2023 (the "Event"), TikTok activated **Phase 0** of its crisis response protocol at 06:30 am (Irish time) that same morning. This was initiated following an internal escalation of the Event.
 - b. At 06:34 am (Irish time) on 7 October 2023, **Phase 1** was initiated by the IM team. The IM team commenced the triaging process to assess whether the Event amounted to a crisis pursuant to the Crisis Management Playbook. The triaging process consisted of reviewing the escalation and starting to investigate the scope of the Event.
 - c. At 07:25 am (Irish time) on 7 October 2023, having verified the escalation received and determined the scope of the Event, the IM team declared the Event a crisis and initiated **Phase 2**: activation of the crisis response protocol.
 - d. By 07:30 am (Irish time) on 7 October 2023, once the Event and the related conflict were declared a crisis, the IM team had already started the cross-functional response to the crisis as part of **Phase 3**. This entailed creating (with the relevant cross-functional team) dedicated groups to manage the crisis in relation to the Israel-Hamas conflict. The cross-functional response to the crisis as part of Phase 3, also included the deployment of mitigation strategies (such as securing 24/7 Arabic and Hebrew moderation coverage) and initiating additional reviews of uploads for violative content. Please see our response to **question A.2.ii** for additional details on the cross-functional team involved in the crisis management plan for the Israel-Hamas conflict.
4. In line with TikTok's Crisis Management Playbook, a Crisis Committee consisting of senior leadership for the EMEA region was established by 10:00 am (Irish time) on 7 October 2023, due to the severity and the global nature of the Israel-Hamas conflict. Senior global leadership was also informed.
5. As the conflict is continuing, we remain in Phase 3 of the crisis response protocol as at the date of this response.

ii. What are the activation criteria for this level of crisis response?

1. As part of the activation criteria in its standard operating procedure, TikTok recognises that certain events are inherently more likely to be considered a crisis, including "Conflicts" defined in the Crisis Management Playbook as "*large scale conflicts (e.g. civil war, ethnic violence, war between two nations etc.)*". The "Conflicts" activation criteria was clearly met in this instance. More broadly, in determining if an event is a crisis, TikTok takes into account a number of other activation criteria, among them:
 - a. Imminent threat to TikTok users on a global scale;
 - b. Unexpected or unforeseen threat with wide-ranging impact; or
 - c. Severity of the issue which poses operational challenges.

iii. Are there any geographical differences in the implementation of the "*crisis management process*"?

1. There are no geographical differences in implementation. The scale of the crises themselves and their impact on the platform may differ, which will inform the scale and nature of the response. However this will not impact the geographical implementation of the crisis response protocol. Taking this approach allows TikTok to ensure a consistent and effective response to crises.

iv. What is the interplay between TikTok's operations to address the crisis and the GIFT Crisis Incident protocol in the context of the Hamas-Israeli conflict?

1. TikTok is awaiting the outcome of its application to join the GIFT. While we are not yet members and cannot comment in detail, based on publicly available information, we believe we follow very similar processes to the GIFT Protocol.
2. By way of further information:
 - a. TikTok met the membership requirements for the GIFT and submitted its application to become a member of GIFT in 2021, when the company completed its mentorship programme with Tech Against Terrorism.
 - b. Although not yet a member, TikTok is part of GIFT's working groups and is in close contact with its members.
 - c. In addition, TikTok is also in discussions with a view to formally becoming a "Supporter" of the "Christchurch Call", an international call to action to eliminate terrorist and violent

extremist content online.

3. As mentioned in TikTok's RAR, TikTok is also a member of Tech Against Terrorism, which is an important source of best practice in supporting the technology industry to tackle terrorist exploitation of the internet, whilst respecting human rights. TikTok is also a member of the EU Internet Forum which gathers together EU Member States, industry, academia, law enforcement, European agencies and international partners to discuss and address the challenges posed by the presence of malicious content online, including terrorist and violent extremist content. TikTok has committed to an EU Crisis Protocol – a rapid response initiative to contain the spread of terrorist and violent extremist content online.

v. What are the criteria for de-escalation of the crisis response?

1. Based on TikTok's crisis response protocol outlined in our response to **question A.1.i**, the de-escalation of a crisis takes place in two phases: **Phase 4** and **Phase 5**.

Phase 4: De-escalation & Recovery

2. As part of any ongoing crisis management plan, the "command centre" reviews multiple information sources and emerging trends on a daily basis to understand the evolution of the crisis and the current status of TikTok's response. Please see our responses to **question A.2** for additional details on the role and composition of the command centre.
3. Once the volume of violative content moves to a more stable level, the crisis manager will move from Phase 3 to Phase 4 (De-escalation & Recovery). During Phase 4, the crisis manager will consider reducing the frequency of the meetings and status updates to senior leadership. However, the cross-functional team will continue to monitor the platform to identify and remove potentially new violative content and violative trends related to the crisis. Based on previous crises, we expect that in relation to the Israel-Hamas conflict the issues and trends at Phase 4 will evolve and become more focused on thematic topics such as hate speech and misinformation, from the original themes that were focused on violence and incitement.

Phase 5: Closure

4. When the crisis impact on our platform has been significantly reduced and most of our data points (e.g. violating and potentially violating content volumes spikes, queues backlog, queues latency, etc.) have returned to pre-crisis levels, the crisis manager will convene the Crisis Committee to assess whether or not the crisis can be considered closed.
5. As part of Phase 5 of the crisis response protocol, and typically after an incident such as this, we conduct a post-event review that we term a Root Cause Analysis ("RCA"). Such a review would be aimed at assessing whether the standard operating procedures for crisis management were followed during the crisis and at identifying learnings that would help to further improve our processes for future responses. An RCA in this context would typically cover topics such as the main incidents and issues that arose during the relevant crisis, key learnings from the response (from a process, product and policy perspective) and any

improvements that could be made for the next crisis.

6. TikTok continues to monitor the evolution of the Israel-Hamas conflict. As mentioned, whilst the conflict is continuing we remain in Phase 3 of the crisis response protocol.

vi. Have you foreseen post-event review processes?

1. We understand the Commission's question to be directed at understanding what are the de-escalation criteria and post-review processes that TikTok has in place in the context of its crisis response protocol and therefore refer the Commission to our response to **question A.1.v** above.

2. In its statement on the continued actions to protect the TikTok community during the Israel-Hamas conflict, TikTok states that it “immediately mobilized significant resources and personnel to help maintain the safety of our community and integrity of our platform.” TikTok also states that it launched a “command center that brings together key members of our 40,000-strong global team of safety professionals, representing a range of expertise and regional perspectives, so that we remain agile in how we take action to respond to this fast-evolving crisis”. Please provide information and underlying documents related to the following questions:

i. What are the concrete missions entrusted to the “command center”?

1. The primary role of the command centre is to provide a forum for information sharing and strategic direction in relation to TikTok's response during the Israel-Hamas conflict. The command centre's main objectives are ensuring an effective response tailored to the crisis, safeguarding a positive experience on the platform and protecting TikTok from external risks.
2. To achieve these objectives the command centre's core missions are:
 - a. Maintaining the safety of the TikTok community and the integrity of the platform, by monitoring and addressing fluctuations in relevant data points (such as volumes of content flagged for moderation and number of views of violative videos before enforcement action was applied);
 - b. Coordinating ongoing work and crisis management for all Trust & Safety teams involved in the crisis management plan;
 - c. Providing regular updates to senior leadership on progress made, blockers and challenges;
 - d. Identifying and implementing short and long term solutions to address existing risks;

and

- e. Identifying emerging risks and mitigation preparedness.

ii. Please explain the organisational set up of the “command center” dealing with the current crisis, including organisation charts, reporting lines, information on the teams involved, their size and location.

- 1. TikTok notes that this is a particularly expansive question. As such, TikTok has provided the information available.

Overview of command centre composition

- 2. The command centre is composed of a cross-functional team, with subject matter experts across both TikTok's Trust & Safety team and certain other teams. This approach allows TikTok to ensure that appropriate and necessary experience and skills are brought to bear in dealing with a crisis. All Trust and Safety teams ultimately report to Cormac Keenan, Global Head of Trust and Safety.

Israel-Hamas command centre composition

- 3. The command centre TikTok set up in relation to the Israel-Hamas conflict totalled 200 members representing 14 different teams across TikTok globally. Location-wise, the majority of teams forming the command centre primarily operate out of TikTok's Global Trust & Safety hub in Dublin, Ireland. There are also individual command centre team members located outside of the EU in Israel, across the middle-east region and the USA.
- 4. Please see below a full list of all teams involved in the command centre, together with an explanation of their respective areas of expertise:
 - a. **Incident Management ('IM')**: A multidisciplinary team of experts who work together to identify, detect, and mitigate risk in response to escalation scenarios. The IM team is responsible for crisis management and the administration of day to day actions.
 - b. **Investigations (Detection and Prevention)**: A group of highly experienced specialists who support the IM team in containing escalations, improving detection and providing actionable intelligence to the IM and OPS teams to help with strategic decisions in relation to mitigation and preventative measures. During crisis events, the Investigations team supports the IM team in implementing proactive strategies to reduce immediate or emerging risks and escalations, to remove similar or duplicative violative content from the platform.
 - c. **Trust & Safety Risk Analysis**: Staffed by experienced professionals with backgrounds in cyber intelligence and risk detection. This team's role is to monitor risks both in real time and over a period of time to detect emerging trends and patterns, and their activities include monitoring open-source resources and reporting to cross-functional

colleagues on potential emerging risks.

- d. **Emergency Response:** Provides 24/7 coverage and includes experienced safety specialists who have accrued considerable investigatory and incident-handling experience within the technology industry. Many ERT specialists also have years of experience as senior officers in law enforcement agencies, including Interpol, and in the UK's National Crime Agency. The ERT is responsible for handling internal escalations of suspected emergency situations and for handling emergency data disclosure requests submitted by law enforcement, which may involve imminent Israel-Hamas conflict-related risks.
- e. **Trust & Safety Product Policy:** Involves four key functions (i.e. Issue, Regional, Feature, and Outreach & Partnerships), which are summarised as follows:
 - i. **Issue Policy:** A dedicated Issue Policy team contains subject matter experts responsible for TikTok's policies across minor safety, hate speech, violent behaviours, dangerous actors and other topics covered in our community guidelines. The *Violent Behaviours & Dangerous Actors Issue Policy* team leads in the formulation of our policies that combat harmful content including pertaining to the Israel-Hamas conflict and plays a crucial role in framing our approach to combating these issues in a balanced and policy-driven manner.
 - ii. **Regional/Local Policy:** We also have Regional Policy teams in each region who represent a specific country or region. These teams provide invaluable insight, cultural context, local knowledge and understanding of the interplay between global and local policies and drive local discussions and engagement on content policy issues.
 - iii. **Feature Policy:** Responsible for developing policies that are specific to the individual products or features that form part of the Platform (such as Live, Comments, Discoverability), as well overseeing account-level policy moderation issues.
 - iv. **Trust & Safety Outreach and Partnerships ("OPM"):** Responsible for managing TikTok's relationships with existing partners and outreach initiatives and for developing new outreach partnerships. With particular regard to the Israel-Hamas conflict, the OPM leads several key partnerships and strategic collaboration with external experts, specialists and academics in the field of countering violent extremism.
- f. **Regional Safety & Integrity:** Led out of Dublin, the role of this team is to monitor and manage risks at a regional level, including across the EU, and to design, coordinate and project manage cross-functional risk mitigation programmes, involving multiple other teams.
- g. **Data Science:** Creates and monitors data to identify key analysis trends. These insights are then used to guide crisis management teams in prioritising areas of concern, support decision-making and ensure that any emerging risks are correctly

identified and escalated to the relevant teams.

h. **Product (Integrity and Authenticity, LIVE, High Harm Obstruction):** In a crisis scenario, the team is responsible for providing issue specific guidance and advice to assist with crisis de-escalation.

i. **Integrity and Authenticity:** Defends TikTok's community from issues of misinformation and deceptive behaviour and is also responsible for elections integrity.

ii. **LIVE Safety:** TikTok's LIVE Safety team also comprises product managers, algorithm engineers, engineers and data scientists working in close collaboration to design safety strategies, as well as launch features and models, specifically focused on detecting and enforcing on livestream risks.

iii. **The High Harm Obstruction:** This team is responsible for protecting the TikTok community against inherently violative content via risk detection, user behavioural intervention, and education.

i. **Law Enforcement Outreach:** Frequently engages in outreach with national law enforcement authorities ("LEAs") across the EU and with international agencies (such as Europol and Interpol, and with trusted LEAs outside the EU). An important aspect of outreach with LEAs is risk detection and intelligence gathering on new and emergent risks.

j. **Core Safety:** Responsible for overall platform video safety and account enforcement. The Core Safety team works closely with our risk management team to reduce risk on the platform for video safety and account enforcement.

k. **Trust & Safety Operations ("OPS"):** While the majority of the teams listed above in this section are responsible for key technical and strategic measures at the core of our crisis management plan in response to the Israel-Hamas conflict, our OPS team is responsible for the operational aspects.

l. Other teams involved in the command centre include our Global Communications, Public Policy and US Data Security.

iii. The criteria for de-escalation of the "*command center*" element of the crisis response.

1. Please refer to our response to **question A.1.v** that is also responsive to this question.

3. In its statement on the continued actions to protect the TikTok community during the Israel-Hamas conflict, TikTok states that it is adding “*more moderators who speak Arabic and Hebrew to review content related to these events*”.

i. Please indicate the current numbers of moderators who respectively speak Arabic and Hebrew, as well as the changes in number that have occurred since the beginning of the conflict.

1. In addition to TikTok's proactive detection and enforcement measures, and reflecting relative population sizes, the current total number of Arabic and Hebrew-speaking content moderators at TikTok is 2570, of which 2491 moderators are Arabic speakers and 79 are Hebrew speakers.
2. In response to the events of 7 October 2023, 72 additional Arabic- and Hebrew- speaking moderators were deployed in order to augment existing content moderation teams in reviewing content, checking for new keywords and assisting with translations in relation to the Israel-Hamas conflict.

ii. Please indicate the qualifications of the staff involved in content moderation linked to the current crisis, including their subject matter expertise.

1. As explained in our TR (at Section 3), to ensure our content moderators are appropriately qualified to make decisions, we have Regional Policy teams in each region, ensuring coverage either through designated policy country managers for larger countries or policy managers covering a number of smaller countries. The localised policy outputs from our Regional Policy teams, including the EMEA Regional Policy team, enable our content moderation teams to take a regionally informed approach to content moderation (e.g. rapidly evolving alternative vocabulary or terminology in relation to an unfolding issue, which may vary and evolve over time and between countries and languages). Our EMEA Regional Policy team members also assist with expert knowledge on a broad range of topics such as hate speech, violent behaviours, and dangerous actors. These expert members have relevant credentials and experience, including cross-industry experience from their work in NGOs, academia and the wider tech industry.
2. To ensure a consistent understanding and application of TikTok policies, all content moderator personnel receive training across relevant policies, including policies which relate to misinformation and violent extremism. Personnel involved in reviewing reported illegal content receive additional focused training on assessing the legality of reported illegal content.
3. TikTok keeps all of its content moderation training materials under review to ensure that they are accurate and current. These materials include clearly defined learning objectives to ensure all content moderator personnel understand the core policy issues and their underlying policy rationale, key terms and policy exceptions (where applicable).
4. As also set out in our TR (at Section 3), we have established a number of specialised

Trust & Safety moderation teams to assist our content moderators review content relating to complex issues. For example, assessing harmful misinformation often requires additional context and assessment by our specialised misinformation moderators who have enhanced training, expertise and tools to identify such content, including direct access to our fact-checking partners. We moderate content in more than 70 languages globally and we are transparent in our regular Community Guidelines Enforcement Reports about the primary languages our moderators work in globally. This language capability complements our awareness-raising materials, like the Community Guidelines, that are also available in multiple languages. We also have moderation personnel that are not assigned to a particular language, who assist with reviewing content such as photos and profiles.

5. Members of our Trust & Safety Policy teams attend regular internal meetings dedicated to knowledge sharing and discussion about relevant issues and trends in content moderation. TikTok's Trust & Safety Policy teams also participate in various external events to share expertise and support their continued professional learning. These engagements contribute to the teams' awareness of the risks which may arise on the platform, which in turn informs TikTok's overall approach to content moderation.

Additional, conflict-specific support and expertise

6. In a crisis situation such as the Israel-Hamas conflict, our Trust & Safety Product Policy teams provide ongoing support and guidance to the content moderation teams. As part of our crisis management plan, our global Trust & Safety Product Policy team (working with our Issue Policy, Regional Policy and Feature Policy teams) has provided additional guidance adjusting content moderation approaches to the new challenges arising from the Israel-Hamas conflict.
7. Guidance was also provided to all relevant OPS teams, including content moderation and quality assurance. As part of our crisis management plan to support moderation efforts, we have deployed advisors from the OPS team to the moderation teams to assist and guide our moderators on topics such as emerging trends and to ensure that any updated guidance relating to the conflict is being implemented effectively and consistently as events unfold. Doing this helps enhance the moderators' knowledge and understanding with a view to supporting decision accuracy. Advisors from TikTok's OPS team work closely with and are themselves supported by our Policy Implementation & Enforcement team and Regional Policy teams.

B. Questions related to the applicable terms and conditions and their enforcement.

4. In its statement on the continued actions to protect the TikTok community during the Israel-Hamas conflict, TikTok states that it has adapted its "*proactive automated detection systems in real-time as [it] identifies new threats; this enables [TikTok] to automatically detect and remove graphic and violent content so that neither [TikTok] moderators nor [TikTok] community members are exposed to it*".

i. Please describe how these automated detection systems are adapted “*in real time*”.

1. For crisis situations that evolve quickly, such as the Israel-Hamas conflict, TikTok implements supplementary automated detection systems that are capable of being updated regularly in order to be able to adapt and react to new challenges.
2. In particular, TikTok employs a rule building tool which complements our baseline automated content moderation tools and allows us to incorporate new signals, such as emerging keywords (see further detail below).
3. To inform our approach to building these rules, we identify new emerging trends from a number of different specialised teams and sources, including: internal information points on violative content, external risks flagged by our Risk Analysis teams, escalations received by the IM teams and proactive efforts by our Investigations teams to monitor for and identify violations.
4. In addition to rule building, we also have other systems that work across different features to prevent violations. For example, we can block the posting of specific text or phrases that are inherently violative. We can also add violative videos and audios into our High Risk Library as reference files, which means any similar matches will be detected and blocked from being posted on the platform. In addition, we have systems in place which are designed to find and identify content that is similar to known violative content on the platform, which can then be added to our rule building tool.

Keywords

5. TikTok has developed a bank of keywords to moderate violative content and terms, which is managed and monitored by a dedicated team of specialists within the Keywords Policy team, together with the Feature Policy and the Regional Policy teams, where appropriate.
6. The keywords are generally provided by the IM team, as part of their risk monitoring activities. TikTok also collaborates with external partners to identify keywords and new emerging trends. In the context of the Israel-Hamas conflict, we have considered the protection of both the Jewish and Arab/Palestinian/Muslim communities identifying keywords that assist us in doing so. For example, from a Palestinian perspective, TikTok has collaborated with Zamleh [pronounced *hamleh*], a Palestinian partner, to identify keywords in relation to incitement to violence, dehumanising terms and hate speech against Palestinians. TikTok has also collaborated with SMEX (Lebanon), the International Committee of the Red Cross, Tech Against Terrorism, TikTok's Safety Advisory Councils in MENAT and Europe, and continues to engage with local NGOs and representatives for both Israel and Palestine to identify new emerging risks.
7. This is a particularly effective mitigation measure, which is able to be updated swiftly, as once a keyword has been identified, it will start being effective in a matter of minutes, typically within 5 minutes.

ii. Please provide details of any measurement or assessment of accuracy of the enforcement of TikTok policy – i.e., the effectiveness of TikTok's measures - which covers, explicitly or implicitly, the management of the crisis as of 7 October 2023, and notably the impact in the European Union.

1. As detailed in our TR, we consider the proportion of videos removed and not reinstated on the platform following appeal an appropriate indicator of the accuracy rate of TikTok's automated content moderation tools with regard to the dissemination of violative content.
2. The best data available relating to assessment of accuracy of the enforcement in the EU region are as follows: from 7 October to 20 October 2023 and limited to the following policies: illegal activities and regulated goods, violent and graphic content, and violent extremism, we removed over 249,000 pieces of user-generated short-form video content originating in the EU and later restored 17,592 (7%). As a result, the accuracy rate for the enforcement against violative content in relation to these policies during this period is 93%.
3. Please note that violative content removed under these policies is not limited to the Israel-Hamas conflict and includes all proactive automated content moderation tools. However, we believe the data is an appropriate indicator of accuracy of enforcement.

iii. Please provide any evidence including in the form of internal documents regarding tests of the adaptation of the automated detection systems, their outcome and the conclusions drawn from the tests, including the timeline for such tests and improvements.

1. Ahead of deploying any new or adapted automated content moderation tool, TikTok carries out testing and offline analysis of the proposed tool or changes to the tool. The testing and monitoring of the tool, can be broken in four main categories:
 - a. **Offline data analysis:** Before the deployment of any new automation, TikTok executes a dry run. This allows the product and data science team to test and monitor the proposed automation measure and make any changes in an offline controlled environment. Based on the performance in the dry run, the product and data science teams are able to understand the effectiveness of the solution and review the type of content that is being identified. As part of this, TikTok can also understand the precision and recall rate to evaluate the model's effect.
 - b. **AB test / partial deployment:** Once the results of the offline data analysis have been reviewed and before fully launching the new automation solution, TikTok will first evaluate the performance of the automated content moderation tool through a partial deployment to a limited percentage of traffic, typically limited to 10%.
 - c. **Online data monitoring:** TikTok carries out periodic monitoring of the performance of the automated content moderation tools to ensure high precision of accuracy of

enforcement against content. Where we identify abnormalities in the data, we take a random sample of content that has faced enforcement action based on the automation for independent review. Following that review, we then adjust the automation tool to ensure we maintain high precision of accuracy enforcement.

- d. **User appeals:** TikTok reviews the user appeals it receives and monitors the appeals success rate for content where enforcement action is taken using automated content moderation tools. If a specific rule has a high appeal rate, TikTok reviews the appeals and analyses them to assess how the rules of the automated content moderation tools can be adjusted to improve precision.
- 2. In relation to the automated content moderation tools deployed in the context of the Israel-Hamas conflict, TikTok is using a combination of monitoring rules and human review to monitor the effectiveness of the deployed systems on a daily basis. See further our response to **question B.4.i.**

iv. Please explain whether and how you have tested whether the “proactive automated detection systems” used have any negative impact for the exercise of the fundamental right to freedom of expression and information, in particular of marginalised groups. Please indicate any performance metrics and controls you have in place in this regard.

- 1. We understand the Commission's question to be directed at understanding how TikTok's automated content moderation tools work to identify potentially violative content and the controls in place in relation to those tools to protect the fundamental rights of European citizens to freedom of expression and information.
- 2. TikTok's mission is to inspire creativity and bring joy. It is critically important to this mission that TikTok facilitates an environment where users of the Platform can create, share and access creative, educational, fun and informative content across a wide range of issues and interests. This is clearly stated in our Community Guidelines:

"TikTok has eight guiding community principles that help embody our commitment to human rights. Our principles are centered on balancing expression with harm prevention, embracing human dignity, and ensuring our actions are fair. They shape our day-to-day work and guide how we approach difficult enforcement decisions.

[...] 2. Enable free expression: The creativity unlocked by expression is what powers our vibrant community. We honor this human right by providing the opportunity to share freely on our platform and by proactively removing harassing behaviour that can inhibit creator speech. However, free expression is not an absolute right - it is always considered in proportion to its potential harm. It also does not extend to a right to have your content amplified in the For You feed."

- 3. While preserving the ability for users to express themselves, one of our highest priorities is to prevent violent extremists from using our platform to instigate violence or spread hateful

ideology. When it comes to implementing measures to tackle the risk of violative content on the platform, TikTok gives special consideration to the impact and potential negative effects on freedom of expression. We employ various measures with a view to striking the appropriate balance between tackling violative content through measures that are reasonable, proportionate and effective, and implemented in a manner that does not unduly restrict freedom of expression.

4. Please refer to the "Risks to Fundamental Rights" and "Deep Dive: Striking a balance between preventing harm and enabling expression" sections in our RAR for further detail on how TikTok strives to strike an appropriate and proportionate balance between preventing harm and enabling freedom of expression.
5. Below are some of the measures that we take to monitor and test our automated content moderation tools:
 - a. **Localised policy-driven approach:** Taking account of local and regional complexities and nuances is critical when it comes to adopting reasonable, proportionate and effective measures to tackle terrorist content. Through our Regional Policy teams, OPM engagements and other outreach initiatives, TikTok seeks to understand local context and the experiences of communities affected by violent extremism and collaborates with partners across industry sectors, before making decisions that may particularly impact specific communities. These initiatives provide invaluable insight, cultural context, local knowledge and understanding of the interplay between global and local policies. They drive local discussions and engagement on content policy issues, which helps to ensure that we do not take measures that may have disproportionate impacts on freedom of expression.
 - b. **Testing:** As highlighted in our response to *question B.4.iii*, the automated content moderation tools used to detect violative content as part of the automated review process are subject to extensive human oversight and testing to ensure ongoing accuracy and consistency.
 - c. **Quality assurance and management methods:** To ensure accuracy in our moderation processes so that we do not remove lawful and non-violating content (thus unduly impacting on freedom of expression), our content moderation process is also subject to an ongoing internal quality assurance ("QA") process, which is designed to monitor the moderation process, to detect inaccuracies and to facilitate real time monitoring to ensure the accuracy, consistency and efficacy of TikTok's moderation practices. The QA process involves various complementary methods, including: sampling, simulation, moderator appeals, and targeted QA coaching and feedback.
 - d. **Monitoring of user appeals (and complaints):** The volume of user appeals of content moderation decisions and the appeal success rate are continuously monitored by our Trust and Safety teams within each policy category. Our Trust and Safety teams have processes in place to investigate the root causes of fluctuations in the appeal success rate (which may, for example, be caused by policy iterations, policy gaps or operational reasons), and for implementing corrective action plans.

- e. **Community Partner Channel:** We also receive notices from a broad range of NGOs that make up our Community Partner Channel. Based on the insights and reports provided in their notices, we may course correct and remove additional violative content, or reinstate content previously removed from the platform inadvertently.
- 6. In addition to the measures outlined above, TikTok also implemented the following specific mitigations and measures to protect freedom of expression and information in the context of the Israel-Hamas conflict:
 - a. **Engagement with external partners:** As outlined in our response to **question B.8.iii** TikTok has engaged with external partners, in particular Tech Against Terrorism and SITE Intelligence Group to inform its response to the Israel-Hamas conflict. As part of this engagement TikTok discussed appropriate measures and strategies in relation to management of the crisis to ensure freedom of expression and information are not unduly restricted.
 - b. **Ongoing monitoring of effectiveness of automated content moderation tools:** Where we have identified that existing rules (as further outlined in our response to **question B.4.i**) are no longer effective, typically due to the natural evolution of the crisis, we have taken the decision to roll back the relevant rules.

5. In its statement on the continued actions to protect the TikTok community during the Israel-Hamas conflict, TikTok states that it will continue to enforce its policies against violence and hate. However, several reports ⁽¹⁰⁾ inform that, allegedly, violent content depicting hostage taking and other graphic videos are widely circulating on TikTok's platform, in violation of its own Community Guidelines.

i. Please share with the Commission any metrics and assessment of TikTok's enforcement measures with regard to the dissemination of illegal content as of 7 October 2023.

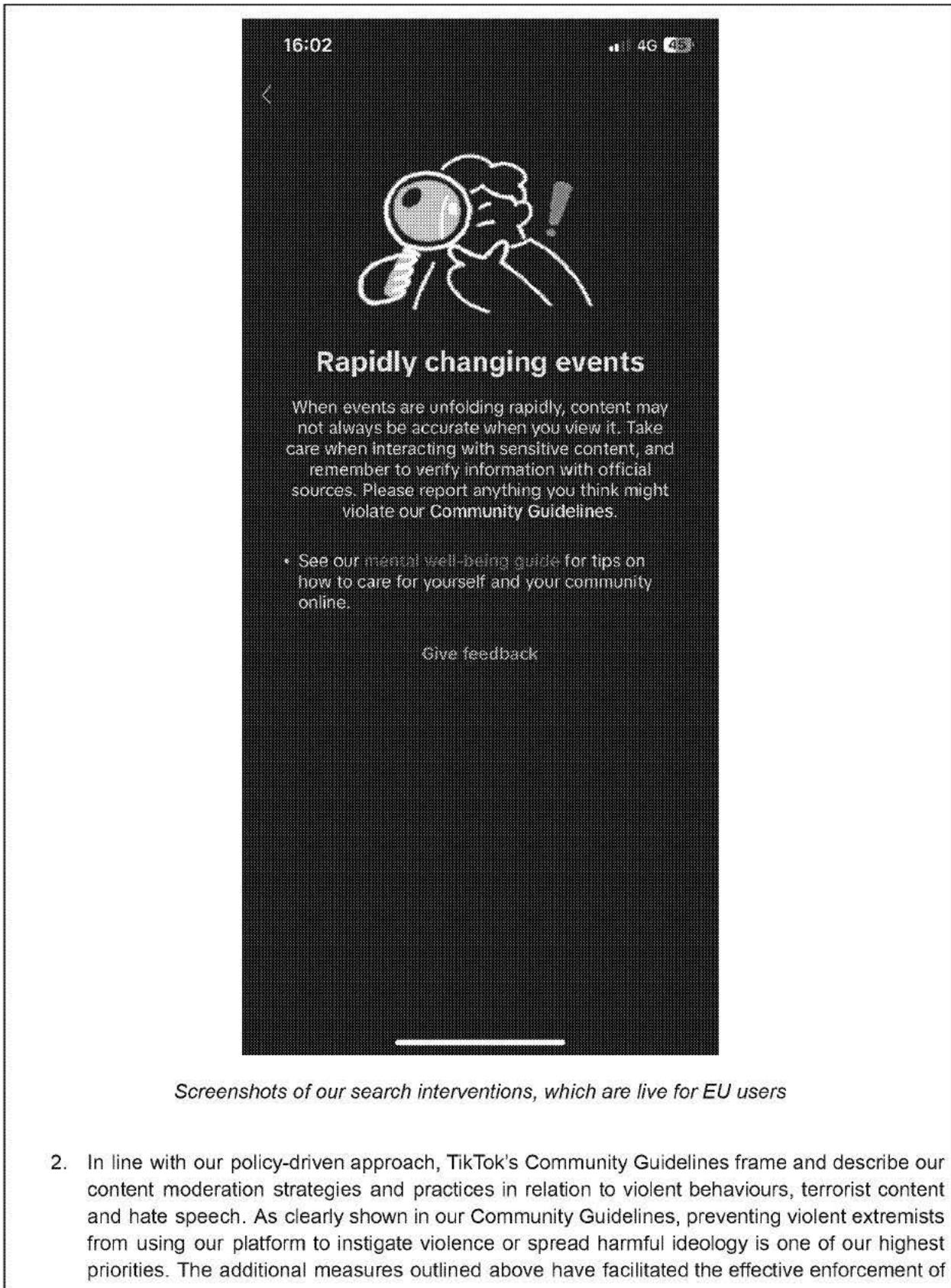
- 1. For the period from 7 October to 20 October 2023, we removed over 468,000 user-generated short-form video content originating in the EU for violations of the following policies alone: illegal activities and regulated goods, harmful misinformation, violent and graphic content and violent extremism.
- 2. TikTok received approximately 57,600 appeals in relation to these removals and later reinstated approximately 34,000 pieces of content (i.e. 7% of the total removed content).
- 3. Viewing these appeals and reinstatement metrics against the total number of content removed shows that the accuracy rate of TikTok's enforcement measures against violative content in relation to these policies during this period is 93%. These metrics include content removals by both automated content moderation tools and human moderators.

4. Although the violative content removed under the above mentioned policies is not limited to content directly related to the Israel-Hamas conflict, we believe the data is an appropriate indicator of TikTok's enforcement measures with regard to the dissemination of violative content.

ii. Please explain whether TikTok put in place any additional measures as of 7 October 2023 to mitigate the risks related to wide dissemination of violent behaviours and hate speech in the context of the Hamas-Israeli conflict, and explain what these concrete measures are.

1. In addition to the measures and resources cited in our responses to **questions A.3 and B.4**, TikTok implemented the following additional measures and resources to contribute to its risk mitigation efforts against the dissemination of content including violent behaviours and hate speech in response to the events of 7 October 2023.
 - a. **Restrictions on content.** On 9 October 2023, based on the evolution of the crisis, TikTok decided to suspend user-generated short-form video and LIVE content originating from Israel and Palestine from being eligible for recommendation on the For You Page for users in the EU. This was a preventative measure to mitigate the risk of LIVE and other video content (e.g. illegal hate speech, terrorist content) being widely disseminated on the platform. We have also introduced new restrictions on LIVE eligibility for users based in Israel and Palestine, to mitigate the risk of bad actors using the platform to post violative content, as outlined in our response to **question B.8.v**.
 - b. **Increasing numbers of Arabic- and Hebrew-speaking moderators.** For further detail, please see our response in relation to **question A.3.i**.
 - c. **Proactive monitoring and enhancements to automated content moderation tools to include new keywords and speech patterns.** For further detail, please see response in relation to **questions B.4.i, B.6.iii and B.8.vii**.
 - d. **Search Interventions.** In addition, in order to minimise the discoverability of misinformation and help to protect our users, we have launched search interventions which are triggered when users search for neutral terms related to this topic (e.g., Israel, Palestine). These search interventions remind users to pause and check their sources and also directs our users to mental wellbeing guides.

Redacted



Screenshots of our search interventions, which are live for EU users

2. In line with our policy-driven approach, TikTok's Community Guidelines frame and describe our content moderation strategies and practices in relation to violent behaviours, terrorist content and hate speech. As clearly shown in our Community Guidelines, preventing violent extremists from using our platform to instigate violence or spread harmful ideology is one of our highest priorities. The additional measures outlined above have facilitated the effective enforcement of

TikTok's Community Guidelines in the context of the Israel-Hamas conflict.

iii. Please provide evidence and a timeline of how TikTok has processed notices submitted by NGOs or national authorities and law enforcement with regard to content that is allegedly illegal or contrary to TikTok's terms and conditions and is related to the Hamas-Israeli conflict. Please refer to notices received since 28 August 2023 and explain the follow up given by TikTok to those notices and the time to process the notices before following up.

1. For the period starting from 7 October to 23 October 2023, TikTok received 14 notices related to the Israel-Hamas conflict submitted by European organisations, as summarised below:

Type of organisation	Number of notices	Median turnaround time ("TAT"), hours
Member state law enforcement authority	2	1.15
Member state national authority	1	2.3
Non-governmental organisation	11	2.2

2. All of the above notices received by TikTok related to the removal of content which allegedly included misinformation, violent behaviour, or violated local law. TikTok has actioned such notices (i.e. reviewed and made an enforcement decision) within the average timeframes as indicated in the table above according to its policies, as set out in further detail below.

Further details on notices from member state law enforcement authorities

3. We received two notices from German law enforcement authorities, the details and follow-up for which are as follows:
 - a. One notice reported a livestream: this livestream had been terminated by our content moderation teams before we received the notice; and
 - b. One notice reported four videos: we banned the user account responsible for the videos in question, thereby also securing the automatic removal of the videos themselves from the platform.

Further details on notices from member state national authorities

4. We received one notice from authorities in France via Pharos reporting a user account. Having

reviewed the notice we geoblocked in France five videos from the reported user account.

Further details on notices from non-governmental organisations

5. We received 14 notices from various EU non-governmental organisations, the details and follow-up for which are as follows:
 - a. We received eight notices from Conseil Représentatif des Institutions Juives de France, of which:
 - i. Six notices reported video content: all videos reported were removed from the platform;
 - ii. One notice reported a video as well as the related account: we removed the video but not the account as the rest of the account's content was not violative; and
 - iii. One notice reported content which we retained on the platform.
 - b. We received one notice from Youthprotect e.V. (former Game-Community Deutschland e.V.) reporting a video which we removed from the platform.
 - c. We received one notice from Net Ecoute e-Enfance reporting three livestreams, all of which had been terminated by our content moderation teams before we received the notice.
 - d. We received one notice from FSM (Freiwillige Selbstkontrolle Multimedia-Diensteanbieter e.V.) reporting a video which we removed from the platform.

6. In its statement on the continued actions to protect the TikTok community during the Israel-Hamas conflict, TikTok states that it will continue to enforce its policies against harmful misinformation. In TikTok's response of 13 October to Commissioner's Breton's letter of 12 October 2023, TikTok states that "*We have already taken action in relation to fake/manipulated content and removed that which repurposes content from other conflicts or events (e.g. 'festivals and unrelated mass gatherings') and falsely claims that it represents current events. We do this by referring suspected content to our fact-checking partners and taking steps to prevent any removed content from resurfacing on the platform*". Please provide information and underlying documents related to the following questions:

i. How does TikTok identify which content is allegedly false/manipulated and need to be fact-checked? Please share with the Commission any metric and assessment of the effectiveness of the methods used to identify this type of content.

1. To the maximum extent feasible, we endeavour to proactively detect and remove harmful misinformation content *before* it is reported to us by users or third parties. To do so we have implemented automated and manual content moderation systems and processes as well as a range of other safety features that are developed, maintained and applied by a range of teams.
2. We identify content as potential misinformation using a number of methods, including: (a) user reporting tools which enable users to report content as "harmful misinformation"; (b) reports from trusted third parties, including our fact-checking partners who proactively flag such content to us; and (c) automated content moderation tools, including rule-based detection strategies often built using information collected from fact-checking partners.
3. TikTok's fact-checking programme forms part of our efforts to proactively identify harmful misinformation/content. The core objective of the fact-checking programme is to leverage the expertise of external fact-checking organisations to determine enforcement action on the most harmful and difficult to verify claims.
4. As part of that programme, TikTok works with 15 IFCN-accredited fact-checking organisations that support more than 50 languages to help assess the accuracy of content in this rapidly-changing environment. We refer suspected content to our fact-checking partners to assess and authorise them to proactively identify content that may constitute harmful misinformation on our platform and suggest prominent misinformation that is circulating on other social media platforms or websites that may benefit from verification. Our moderators also have access to a database of previously fact-checked claims to help assess the accuracy of content and make swift decisions.
5. For the time period January - July 2023, in the EU: 10,181 videos were fact-checked; 2,848 videos were removed as a result of a fact-checking assessment in the EU; 140,635 videos were removed because of policy guidelines, known misinformation trends, and our knowledge-based repository.

ii. Please provide the specific instructions given to TikTok's fact-checking partners in the context of the Hamas- Israeli conflict and the internal documents preparing these instructions.

1. In the context of the Israel-Hamas conflict, our fact-checking partners are following our standard arrangements, whereby they assess content we escalate to them, proactively identify content that may constitute violative content (i.e. because it is harmful misinformation) on our platform, and report misinformation that is circulating on other social media platforms or websites that may benefit from verification.
2. In response to the conflict, we have adjusted our information consolidation process to enable us to store and track content related to the conflict separately from other fact-checked content. This facilitates quick and effective access to relevant assessments, which, in turn, increases the effectiveness of our moderation efforts.

3. We have also requested our fact-checking partners be mindful about how evolving events may impact the assessment of sensitive claims day-to-day. Furthermore, to facilitate effective and accurate responses to unfolding events, we have implemented a process that allows our fact-checking partners to inform us when claims are unconfirmed and to update us on such claims at a later stage when the relevant facts can be verified.

iii. Please explain what are the measures TikTok has in place to prevent previously removed content from reappearing on the platform.

1. TikTok understands that this question is specific to violative content related to the Israel-Hamas conflict.
2. TikTok has developed and implemented a robust system of tools that together help to prevent violative content that was previously removed from reappearing on the platform.
3. Information on these tools is outlined in our response to **question B.4.i**. In addition to the tools described in our response to **question B.4.i** (for example the High Risk Library), TikTok also implements measures to block keywords in search tools, which help to prevent our users from accessing content identical or similar to violative content that has been removed.
4. To implement this measure, at a general level, our IM team identifies keywords which are associated with violative content that has been removed. These keywords are then reviewed by our Feature Policy team and Regional Policy team, where relevant. The words are subsequently added to the relevant keywords list and provided to the teams that operate our automated content moderation tools which aim to detect them upon search.

7. In its risk assessment report, TikTok states that one of the measures put in place to mitigate the risks, notably, for minors, stemming from illegal hate speech and for terrorist content, is the manual reviews of video content when it reaches certain levels of popularity in terms of number of video views, reducing the risks of violative content being shown in the “For You Feed” or otherwise widely disseminated.

i. Please describe the metrics used to determine the level of popularity of a video which triggers manual review.

1. When a video reaches a certain level of popularity on the platform it is flagged for manual review. Determining the level of popularity of a video is not based on a single metric but instead takes into account a variety of factors, which may include the number of views, likes, shares and comments etc.
2. Additionally, manual review may be triggered by:

- a. **Automated review of video content:** this involves use of automated content moderation tools designed for detection and classification of text and audio contained within video content (e.g., text or audio content within a video that may be associated with misinformation). If the outcome of this review determines that the video likely contains violative material, it will be flagged for manual review. Further detail on our automated content moderation tools is outlined in our response to **question B.4.i.**
- b. **User reporting:** where a user or other individual makes a report using the reporting or flagging mechanisms available on the platform.
- c. **Community case-partner intake channel ("CPC"):** separate to those with designated trusted flagger status under the DSA, TikTok operates a CPC whereby onboarded NGOs perform a similar role to designated trusted flaggers (under the DSA) to submit reports of suspected violative content.
- d. **Fact-checking partners:** see response to **questions B.6.i and B.6.ii** for more information about our fact-checking partners.
- e. **Targeted sweeps:** our Trust and Safety team also undertakes targeted sweeps of certain types of content, where they have identified specific risks. For example, this may involve a targeted sweep focused on use of a specific keyword, URL or hashtag identified as being associated with high risk content, such as where certain content is "viral". These sweeps are often informed by our Risk Analysis team's detection of existing or emerging risks, or those flagged by our NGO partners or other third parties, including external threat detection partners.

ii. Please describe the number of the resources and qualifications of staff involved in this manual reviewing, including the language coverage and subject matter expertise of that staff.

- 1. For reference, the information sought in respect of resources and qualifications can also be found in TikTok's TR.
- 2. Information on the qualifications and training of our content moderation personnel is outlined in the response to **question A.3.ii.**
- 3. As set out in the TR, TikTok has 6,125 moderators who are dedicated to moderating content in the European Union. They cover at least one official language for each of the 27 EU Member States.
- 4. As explained in our TR (at Section 3), and outlined in our response to **question A.3.ii.** to ensure the content moderators are appropriately qualified to make decisions, we have Regional Policy teams in each region, which includes coverage for all European Union Member States, for example with either designated policy country managers for larger countries or policy managers covering a number of smaller countries.

8. In its risk assessment report, TikTok states that “*TikTok has taken a number of actions [...] to ensure it is able to respond quickly and effectively*” to terrorist and violent acts being livestreamed on its service. In its statement on the continued action to protect the TikTok community during the Israel-Hamas conflict, TikTok states that it is making “*temporary adjustments to policies*” to proactively prevent TikTok from being used for hateful or violent behaviour in the region, such as “*adding additional restrictions on LIVE eligibility as a temporary measure given the heightened safety risk in the context of the current hostage situation*”.

i. Please explain concretely how TikTok has trained its moderation team to respond to content of this nature (e.g., what is the percentage of the moderators trained, what is the content of the training, etc.)

1. Our response to **question A.3.ii** sets out information on the training of our moderation teams, including additional, conflict-specific support and expertise provided in response to the Israel-Hamas conflict.
2. In addition, our live moderation team is provided with separate, feature-specific training, which includes training on livestreaming-specific content policies on shocking and graphic content, as well as the promotion of violence (including violent ideologies and groups).
3. Further detail on the guidance and training provided in response to the Israel-Hamas conflict is set out in our response to **question B.8.ii** and **question B.8.v**.

ii. Please provide the specific instructions given to TikTok’s moderation team in the context of the Hamas-Israeli conflict and the internal documents preparing these instructions.

1. Please see our response to **question A.3.ii** for details of training provided to our moderation teams, including additional conflict-specific support and expertise provided in response to the Israel-Hamas conflict.
2. As part of this additional support TikTok provided LIVE and short-form video moderators with tailored livestream guidance for content relating to the Israel-Hamas conflict.
3. This included guidance on applying our policies on content related to the conflict which incites violence, promotes terrorism, or spreads dangerous misinformation or conspiracy theories which can cause harm and panic, and shocking and graphic imagery which can be distressing to our users, especially minors. For example, we provided our moderation teams with specific guidance to help them to recognise symbols or images associated with the terrorist organisations involved in the Israel-Hamas conflict, and guidance on responding to hostage-related scenarios, including key identifiers for the likely structure of a hostage scenario in the Israel-Hamas conflict.

4. This guidance seeks to address the challenge of ensuring violative content is removed, whilst protecting our users' freedom of expression. For example, specific exceptions are provided for content that is intended to document and report on harms and content intended to condemn violent behaviours and groups. To help moderators apply this guidance in practice, we provide our moderators with practical examples of violative content and content that is protected based on freedom of expression.

iii. In its risk assessment report, TikTok indicates that it “*augmented its internal risk detection and monitoring capabilities with supplementary information from partnerships with external threat detection partners*”. Please indicate who are these “*external detection partners*” and the exact mission TikTok delegated to them, including their specific instructions.

1. TikTok's internal risk detection and monitoring capabilities are supplemented by our partnerships with external detection partners: leading non-governmental counterterrorism organisations specialising in tracking and analysing online activity of the global violent extremist community. These partners support technology platforms aiming to eradicate terrorist and violent extremist content from their platforms and have provided governments and institutions worldwide with verified, actionable intelligence and analysis on designated terrorist and violent extremist groups.
2. The support provided by these external partners includes:
 - a. **Monitoring:** Conducting monitoring activities across the platform to identify violent extremist content, detect credible threats and escalate them to TikTok personnel.
 - b. **Crisis and incident coverage:** For certain crisis incidents that may trigger increased attempts to disseminate terrorist content (e.g. a real-world terrorist attack), our external partners can provide additional 24/7 coverage for the duration of that incident.
 - c. **Source feed database:** Providing valuable database resources, including thousands of archived audio/video files and URLs published/shared by terrorist and extremist groups, which allows TikTok to detect and take action against violative content.
 - d. **Intelligence gathering:** Ongoing intelligence gathering capabilities in relation to violent extremism, including sharing reports and insights with TikTok on an ongoing basis.
3. The support and information provided by these external partners is utilised in the context of the moderation of live and other forms of content on the platform, and also helps to inform our approach and response to specific risks and emerging trends.
4. In particular, TikTok works with SITE Intelligence Group, Tech against Terrorism, and 16 independent fact-checkers.
5. The SITE Intelligence Group combines real-time data feeds of terrorist and extremist

information with human intelligence to create an indexed and searchable database of confirmed terrorist and extremist content. TikTok uses SITE's database to improve our risk teams' understanding of emerging trends in terrorist and extremist content and to source new signals for our detection systems. The signals (primarily video and image files) allow TikTok to detect suspected extremist content at the point of upload, allowing us to review and action violative content before it is disseminated on the platform.

6. TikTok is also a member of Tech Against Terrorism. Our membership enables us to continue to learn from others in tackling violent extremism. It also provides us with access to training and detection resources to help us to effectively respond to such terrorist and extremist content and actors.

iv. Please explain how these “*external detection partners*” are currently involved in the monitoring of the risks stemming from the livestreaming of violent acts in the context of the Hamas-Israeli conflict.

1. The measures outlined in our response to **question B.8.iii** above have been utilised to help to monitor the risks stemming from the livestreaming of violent acts in the context of the Israel-Hamas conflict.

v. Please describe concretely, including through the provision of internal documents, the processes put in place to respond to any livestream of a violent act, such as execution of hostages and the “*additional restrictions on LIVE eligibility*” added in the context of the Hamas-Israeli conflict.

1. As part of our crisis response, we recognised the severity of the hostage situation, and the potential risk that bad actors may abuse livestreaming functionalities provided by TikTok or other platforms to livestream violent acts. In response to this risk, we have implemented the following additional measures for livestream content:
 - a. **Temporary restrictions on LIVE eligibility:** We have introduced new restrictions on LIVE eligibility for users based in Israel and Palestine, to mitigate the risk of bad actors using the platform to post violative content. These restrictions required users based in Israel and Palestine to have had an active account for the previous 30 days. Users must also have at least 1000 followers to post livestream content. As outlined in our response to **question B.5.ii**, we also took action to suspend LIVE content originating from Israel and Palestine from being eligible for recommendation on the For You Page for users into the EU.
 - b. **Enhanced moderation and targeted guidance and support:** We provided enhanced moderation on livestreams in the region. We also provided our moderation teams with specific guidance to help them to recognise symbols or images associated with the terrorist organisations involved in the Israel-Hamas conflict, and guidance on

responding to hostage-related scenarios, including key identifiers for the likely structure of a hostage scenario in the Israel-Hamas conflict. We have also applied our guidance on human rights in the context of armed conflicts to the Israel-Hamas conflict, including to help us to determine our approach in relation to content that depicts prisoners of war or civilian hostages. Please also see our response to **question B.8.ii**. Our specific policy instructions provided to moderators related to the Israel-Hamas conflict are regularly updated to reflect new information and developing events. In addition, our moderation team, in particular our Hebrew and Arabic speaking moderators, are supported closely by multiple teams, including our dedicated policy team.

2. The additional measures outlined above augment the existing tools, processes and training we have in place to respond to livestreams of violent acts as swiftly and effectively as possible:

- a. **Automated content moderation tools.** Our automated content moderation tools include graphic content models for live content, which are designed to proactively detect: (i) content depicting or including terrorist logos, symbols and flags; (ii) weapons; and (iii) gore including, depictions of deceased individuals. When our models detect that live content contains these signals, the content is prioritised for human review to help to ensure we assess and take action against violative content as rapidly as possible.
 - b. **Training and processes for responding to mass casualty events (including scenarios involving hostages).** We have specific strategies and processes in place in the event of mass casualty events, including scenarios involving hostages. For example:
 - i. **Escalation to law enforcement.** We have internal processes in place that require that, when faced with a livestream hostage situation, or livestream shooting, moderators immediately control the content, which is automatically directed to our specialist Emergency Response Team team to verify the content and work closely with law enforcement partners to disclose the relevant information to authorities.
 - ii. **Training Simulations.** We recently conducted a detailed 4-hour long simulation exercise of a live shooting incident on the platform. The purpose was to assess readiness for handling such a scenario and identify areas for improvement. Adapted to imitate a real-world event, this simulation exercise comprised various simulated “moves” over several hours with teams fed information on an iterative basis. The exercise involved over 40 stakeholders from various internal teams and was designed to provide an opportunity for cross functional stakeholders to test their reaction, processes and team collaboration during potential livestreamed attacks on TikTok. Please refer to the case study “Proactive mitigation measures relating to violent extremism risks” under “Risks of terrorist content” in our RAR for further explanation on some of the proactive mitigation measures TikTok operates to ensure its readiness to prevent and contain violent extremism risks.

3. In the context of content involving hostages, our Global Issue Policy team has engaged with

external human rights experts, including the International Committee of the Red Cross, Centre for Humanitarian Dialogue, to inform our approach and response if content involving hostages were to be shared on our platform.

vi. Please indicate for how long the “*temporary adjustments*” will be made (if already determined).

1. We understand the Commission's question to be directed at understanding how long the temporary restrictions on LIVE eligibility (described in our response to **question B.8.v** above) will remain in place.
2. These measures will remain in place for as long as is necessary. Given the dynamic nature of the current situation related to the Israel-Hamas conflict we cannot specify a precise period. Please see our response to **question A.1.v**, which explains TikTok's de-escalation procedure.

vii. TikTok's risk assessment report presents the “*blocking words commonly used to search for violative content*” as a mitigation measure. Please indicate whether TikTok has already blocked such words in the context of the Hamas-Israeli conflict and the frequency of blocking. If yes, please list the blocked words (break down by languages).

1. Yes, we confirm that we have applied measures to block keywords commonly used to search for violative content in the context of the Israel-Hamas conflict. For further details on our keyword strategy please refer to our response to **question B.4.i**.
2. For context, There are two types of measures related to blocking words used in search terms:
 - a. **Search ban:** This measure prevents certain keywords from being used in search terms, i.e. if they are used by our users in searches, the user will not get any results in return.

From 10 October to 24 October, we have applied search bans on 41 words in response to the Israel-Hamas conflict.
 - b. **Auto-suggestion ban:** This measure prevents certain keywords from being suggested to our users for autocomplete when they type their search. Please refer to the above list.

From 10 October to 24 October, we have applied auto-suggestion bans on 309 words in response to the Israel-Hamas conflict.
3. We confirm that we will provide the list of keywords, broken down by language along with the other documents we will produce.

a. Please provide any measurement or assessment of the effectiveness of these additional restrictions, the performance metrics and controls TikTok has put in place to prevent the livestreaming of violent acts such as execution of hostages.

1. We are not aware of instances of livestreaming of violent acts, such as the execution of hostages in the context of the Israel-Hamas conflict, on TikTok as of the date of this response.

b. Please explain whether and how you have tested whether this measure has any negative impact for the exercise of the fundamental right to freedom of expression and information, in particular of marginalised groups. Please indicate any performance metrics and controls you have in place in this regard.

1. We understand the Commission's question to be directed at understanding the measures and controls TikTok has in place to mitigate the potential for the measures outlined above in our responses to **question B.8.v** and **question B.8.vii** to have a negative impact on the exercise of the fundamental right to freedom of expression and information.
2. As a preliminary point, in the context of the Israel-Hamas conflict and the wider dissemination of information in connection with this evolving crisis, we note that it is challenging to strike a fair, reasonable and proportionate balance between content moderation and protection of freedom of expression and information, in particular against a highly diverse political backdrop (including within the EU). Below are some of the key measures adopted to strike this balance.
3. TikTok's Platform Fairness team is a global issue policy team which works to identify, address and minimise the negative impact of any potential harmful bias and discrimination within our content moderation processes. They do this by undertaking activities to support moderation fairness, model fairness, platform inclusion, and human rights and have partnered with the Trust and Safety Product and Policy teams to better understand the extent to which fairness or unfairness may exist within our content moderation processes.
4. In designing and implementing the measures outlined above, we have sought to balance the importance of taking swift and effective action against violative content alongside protecting users' rights to freedom of expression and information. For example:
 - a. As outlined in our response to **question B.8.ii**, guidance provided to our moderation teams seeks to address the challenge of ensuring violative content is removed, whilst protecting our users' freedom of expression. For example, specific exceptions are provided for content that is intended to document and report on harms and content intended to condemn violent behaviours and groups. To help moderators apply this guidance in practice, we provide our moderators with practical examples of violative content and content that is protected based on freedom of expression.
 - b. Our approach to addressing mass casualty events, particularly scenarios involving

hostages, is grounded in human rights law and international humanitarian law, including the UN Guiding Principles for Business and Human Rights. Specifically in the context of content involving hostages, our Global Issue Policy team has engaged with external human rights experts, including the International Committee of the Red Cross, Centre for Humanitarian Dialogue, to inform our approach and response when content involving hostages is shared on our platform. We have also applied our guidance on human rights in the context of armed conflicts to the Israel-Hamas conflict, including to help us to determine our approach in relation to content that depicts prisoners of war or civilian hostages.

- c. As outlined in our response to **question B.6.iii**, keywords associated with violative content that has been removed are carefully identified by our IM team, and are subsequently reviewed by our Feature Policy team and Regional Policy team, where relevant, before being deployed.
- 5. For further detail on how our automated content moderation tools and systems are designed to ensure that the fundamental freedoms of European citizens are protected, please see our response to **question B.4.iv**.

9. In TikTok's response of 13 October to Commissioner's Breton's letter of 12 October 2023, TikTok states that it “prohibits synthetic media that contains material that has been edited, spliced, or combined (such as video and audio) in a way that may mislead a person about real-world events. We prohibit synthetic media that contains the likeness of any real private figure, anyone under 18, or which violates any other policy, including those on impersonation and misinformation. We will continue to remain vigilant in this area”.

i. Please describe how TikTok identifies “synthetic media that contains material that has been edited, spliced, or combined (such as video and audio) in a way that may mislead a person about real-world events”.

1. There are various ways that TikTok does this:
 - a. Our fact-checking partners flag to us trends that include AI-generated or manipulated media that may constitute violative content (e.g. because it may mislead the public about real-world events). Based on these reports, our teams are able to find more content on our platform that match or are similar to the identified trends, and remove them.
 - b. Third parties including the media and NGOs may flag to us trends that include AI-generated or manipulated media that may constitute violative content.
 - c. Users themselves can label their own synthetic content that has been completely generated or significantly edited by AI by using our AI-generated content label. TikTok's content moderation team may identify that such content constitutes violative content.

- d. User reports of potentially violative content. Content moderation teams will then assess whether the content in question may constitute violative content.
- e. Automated tools that identify potentially violative content could identify synthetic media that also may constitute violative content.

2. We are continuously exploring new products and initiatives to help enhance our detection and enforcement capabilities in relation to synthetic media that may mislead the public about real-world events, including by developing a user education/outreach campaign.
3. Please refer to our response to **question B.6.i** which contains information that is also responsive to this question.

ii. Please describe how TikTok identifies “synthetic media that contains the likeness of any real private figure, anyone under 18, or which violates any other policy, including those on impersonation and misinformation. We will continue to remain vigilant in this area”.

1. Please refer to our response to **question B.9.i** above which applies *mutatis mutandis* to this question.

iii. Please share with the Commission any metric, tests, testing results and assessment of the method(s) used for such identifications.

1. TikTok is not aware that such information is currently available, however, we are continuing to gather information in response to this question and will provide a response shortly.

10. In TikTok's response of 13 October to Commissioner's Breton's letter of 12 October 2023, TikTok states that “our policies prohibit covert influence operations that attempt to sway public opinion while misleading our community or systems. We have a dedicated team that works to monitor for, and remove, this content”.

i. Please describe how TikTok identifies “covert influence operations that attempt to sway public opinion while misleading our community or systems”.

1. At the outset we note that it is difficult to do so and requires a lot of effort and resources. So we focus on user behaviour and assessing linkages between accounts, content and interactions in order to determine whether actors are engaging in a coordinated effort to mislead TikTok's systems or our community.

2. We use a data-driven approach to this analysis which relies on a number of tactics, techniques and procedures ("TTPs"). Examples of TTPs we may rely on within these investigations are highlighted in our Report on the Code of Practice on Disinformation – for the period 1 January 2023 - 30 June 2023, under "Integrity of Service" - Commitment 14 (available [here](#)). In each case, we believe that the actors behind these activities coordinate with one another to misrepresent who they are and what they are doing. So we assess whether user behaviour, linkages and interactions clearly involve a coordinated attempt involving various misrepresentations. Please also see the section on "Measures to identify and address inauthentic content and behaviours" in our RAR for further details.

ii. Please provide information on the size (in FTE equivalent) of the dedicated team as well as information regarding the qualification of the staff involved in monitoring the presence of covert influence operation, including their language and subject-matter expertise.

1. Our Global Influence Operations Threat Disruptions team sits within the Trust & Safety organisation and is responsible for managing the investigation of covert influence activity affecting our EMEA users.
2. The team is a technically focussed investigative team with diverse subject matter expertise, extensive industry experience, cross-industry experience, academic credentials and technical acumen in data analytics.
3. The core team is made up of a diverse staff of 11 people, and includes members who are fluent in multiple languages (for example Arabic, Italian and Spanish). The team also has extensive internal support from partner teams in Trust & Safety and Security to provide further language support and situational awareness globally where necessary. The core team can also access additional resources via third party partnerships when necessary.
4. In addition, we have a parallel capacity in the US.

11. Some media have reported that at least one prominent account that covers news from a Palestinian perspective was informed on Monday 9 October 2023 that it had been permanently banned on TikTok, before being reinstated following criticism that this ban amounted to censorship of Palestinian voices ⁽¹¹⁾. Please describe the internal metrics used to assess whether the content moderation decisions in the context of Hamas-Israel conflict have any negative impact on the fundamental right to freedom of expression and information, in particular of marginalised groups.

1. We understand that this question requests TikTok to describe its approach towards safeguarding the fundamental right to freedom of expression in the context of the Israel-Hamas conflict and the escalation in violative content.

2. Please refer to our responses at **question B.4.iv** and **question B.8.vii.b** for details of the relevant measures and controls in place to mitigate the potential for content moderation measures to have a negative impact on the exercise of the fundamental right to freedom of expression and information.
3. Please also refer to our response to **question B.5.i** for relevant data points, including the accuracy rate for enforcement against violative content.
4. While we do not propose to go into the detail of moderation of the account cited in the question, as it prompted the question, we can confirm that the moderation actions in question were reversed in a very short period and that our processes worked effectively in ensuring that any moderation errors were corrected. Although our preference would be for an issue such as this not to arise, they can happen in dynamic conflict situations like the current conflict. We take some comfort, however, in the fact that this a rare occurrence.

B¹. Questions related to the design of TikTok's recommender systems.

12. According to publicly available research, in the context of the ongoing conflict between Hamas and Israel, the TikTok's "You may like" section recommends harmful or disturbing content to its users, especially younger users, without any safeguards (¹²).

i. Please explain what tests and studies TikTok has conducted to assess whether the recommender system(s) used for the "You may like" section might contribute to any of the systemic risks listed in Article 34(1), in particular the systemic risks related to public security, civic discourse, the protection of minors and/or the mental well-being of its users. In particular, please indicate whether TikTok has evaluated whether its recommender systems might expose users to violent and/or harmful content when they did not request it or express an interest in accessing this type of content providing also the specific features and outcomes of these tests. Please specify any performance metrics and controls you apply in this respect and explain which types of content and which recommender systems these measures apply to.

1. In relation to studies that TikTok has conducted to assess whether its recommender system might contribute to systemic risks, TikTok refers the Commission to its RAR, which describes the process it took for its first risk assessment. In addition, we provide below some important context for the 'You May Like' feature, before setting out information on tests and controls applied to content that may be recommended to users.

How TikTok's 'You May Like' feature works

2. The 'You May Like' feature recommends content when a user clicks on the search icon but before they input any search terms. The 'You May Like' system suggests content based on

¹ Should be section "C"

user preferences as expressed through interactions on our platform, such as previous video interactions, searches or content that is trending.

3. As with other features discussed in TikTok's response, we take a number of measures to define and mitigate potential risks, ensuring that users are not exposed to harmful content on the platform. In particular, we have implemented various safety measures, incorporating natural language processing models and human moderation to remove text violating our Community Guidelines. Concurrently, we continually assess the risk ratio of video content in search results to identify and filter text that may present violative content.

Fire Icon

4. When interacting with the 'You May Like' feature, users might see a 'Fire' icon. TikTok's search recommendations based on the fire icon are based on trending "hot" search terms, and personalised to the user. TikTok develops the Fire icon trending recommendations in the 'You May Like' section based on two sources:
 - a. **Popular search terms on TikTok:** based on popular recent platform interactions.
 - b. **Information from news websites.** In certain regions, TikTok collects data on news article titles from a number of reputable and vetted news outlets to provide search recommendations.
5. Once TikTok has determined that a search term is popular, the search term is added to a moderation queue to be reviewed by TikTok's moderation team. Only once the search term has been reviewed and approved by the moderation team the term will go live.

Testing and monitoring of the 'You May Like' feature

6. During the rollout of the 'You May Like' feature (which occurred before the Israel-Hamas conflict), TikTok adopted a phased approach, starting with 5% of experimental traffic and gradually increasing it. In each round of testing, TikTok refined its safety strategies and implemented measures to mitigate the risks identified through the lessons learned and the escalations identified by the moderation teams.
7. TikTok's search team continues to monitor the performance of the 'You May Like' feature, to ensure that the mitigations measures remain effective and violative content is minimised.

Public security

8. In our RAR (see section titled "Risks to public security from harmful misinformation/content" and Tables 7 and 8) we included information in relation to the testing and adaptation of algorithmic systems, including recommender systems (as defined in Art 3(s) DSA) and specifically the additional adaptations to mitigate the risk of violative content being recommended by our recommender systems.

Minor protection

9. To ensure the protection of minors in relation to the 'You May Like' feature specifically, TikTok applies keyword filtering to the search results shown to minors to remove content that might not be appropriate for minors. For further information on our measures to ensure minor protection on our platform please refer to our RAR (see section titled "Online Protection of Minors and associated risks" and Table 9).

Changes to the 'You May Like' feature as a result of the Israel-Hamas conflict

10. As a result of the events of 7 October 2023, we have enacted the following strategies:

- Commencing on 8 October 2023, we have continuously monitored and removed emerging terms to mitigate the risk of search results associated with violent or harmful content being recommended through the 'You May Like' feature. Please see TikTok's response to **question B.4.i** and **question B.8.vii** for more details on our keyword strategy.
- On 18 October 2023, we removed the Fire Icon from recommended search results related to the Israel-Hamas conflict to mitigate any potential mis-association of the Fire Icon.

ii. Please explain whether TikTok has operated any changes to the recommender system(s) and the measures taken to prevent the recommendation, recirculation, or amplification of illegal content related to the Hamas-Israeli conflict (e.g. illegal hate speech, terrorist content), as well as content that violates TikTok's policies applicable to this situation. Please refer to any changes and measures taken as of 28 August 2023 and specify which measures were applied on or after 7 October 2023 with respect to content available in the European Union. Please specify any performance metrics and controls TikTok applies in this respect and explain which types of content and which recommender systems these measures apply to.

- On 9 October 2023, based on the evolution of the crisis, TikTok decided to suspend user-generated short-form video and LIVE content originating from Israel and Palestine from being eligible for recommendation on the For You Page for users in the EU. This was a preventative measure to mitigate the risk of LIVE and other video content (e.g. illegal hate speech, terrorist content) being widely disseminated on the platform.
- That said, in line with our crisis management plan we ensured our approach continued to be subject to review, mindful of the fast-changing landscape surrounding any crisis (and the potential impact on fundamental rights). Therefore, after further analysis, on 18 October 2023 TikTok permitted user-generated short-form video content originating from Israel and Palestine to be recommended in users' For You Page in the EU and other regions.
- In respect of performance metrics and controls, we are continuing to gather information in response to that aspect of the question and will provide a response shortly.

iii. Please explain whether and how you have tested the potential impact of TikTok's recommender system(s) on the fundamental right to freedom of expression and information. Please indicate any performance metrics and controls you have in place in this regard.

1. When it comes to implementing measures to tackle the risk of violative content on the platform, TikTok gives special consideration to the impact and potential negative effects on freedom of expression and access to information. As we have outlined in our responses to this RFI, we employ various measures with a view to striking the appropriate balance between tackling violative content through measures that are reasonable, proportionate and effective, and implemented in a manner that does not unduly restrict freedom of expression. Please refer to our response to **question B.4.iv** which contains information on our content moderation measures that is also responsive to this question (as content moderation measures impact our recommender systems).
2. While we acknowledge the measures outlined above will have impacted the content suggested to users in the EU via TikTok's recommender systems, one of our highest priorities during a crisis, such as the ongoing Israel-Hamas conflict, is to prevent violent extremists from using our platform to instigate violence or spread hateful ideology. We keep measures designed to assist with that priority under review to evaluate whether they need to be changed, including considering the fundamental right to freedom of expression and information.
3. Please refer to the "Risks to Fundamental Rights" and "Deep Dive: Striking a balance between preventing harm and enabling expression" sections in our RAR for further detail on how TikTok strives to strike an appropriate and proportionate balance between preventing harm and enabling freedom of expression.
4. We are also collaborating with external partners, in particular Tech Against Terrorism and SITE Intelligence Group to inform our response to the Israel-Hamas conflict. As part of this engagement TikTok has discussed appropriate measures and strategies in relation to management of the crisis to ensure freedom of expression and information are not unduly restricted.

Exhibit 7

TikTok Technology Limited's response to Section II of RFI
(Ref.Ares(2023)7112552 - 19.10.2023)
17 November 2023

Introduction

1. In this document, TikTok Technology Limited sets out its response to **Section II** of the Commission's request for information (Ref.Ares(2023)7112552 - 19/10/2023) (the "**RFI**").
2. Before getting into the responses to specific questions, we wish to raise the following preliminary points:
 - a. TikTok is concerned that a number of the questions request granular data which appear to be disproportionately broad and onerous, such as data on daily content moderation decisions in respect of specific elections. We would be grateful to discuss this with the Commission. In the meantime, TikTok has provided the data which we consider is sufficient to provide the Commission with an understanding of TikTok's mitigation measures and consider that daily data is not required or useful in assessing such mitigation measures.
 - b. Some of the questions below are directed at understanding the internal controls that TikTok has in place in relation to its measures to mitigate against risks relevant to civic discourse and electoral process. TikTok will be documenting and monitoring the effectiveness of key controls as part of its approach to audit readiness, and information relating to TikTok's audit process will be available in due course as required by Arts 37 DSA and 42(4).
3. In light of these points, TikTok reserves its position as to the appropriateness of certain of the questions raised by the Commission. However, in the spirit of cooperation, and acting in good faith, TikTok has sought to address the Commission's queries to the best of its ability, in the limited time available.
4. In particular, TikTok would be grateful for the opportunity to discuss with the Commission its approach of seeking information in relation to specific elections (including the Luxembourgish election which the Commission previously communicated it considered low risk), rather than in relation to the systemic risks associated with elections and civic integrity more broadly.
5. TikTok understands that the Commission's position is that it is not yet able to ascertain TikTok's compliance with the provisions of the DSA stated in the RFI. TikTok takes this concern very seriously. While we have sought to address the Commission's queries to the best of our ability, in the limited time available, the timescales have been very challenging. We would be grateful for the opportunity to discuss future timescales to ensure TikTok is accorded due process.
6. We will be in touch in the coming days with regards to dates for a meeting to discuss this response together with the other RFIs.

II. As regards TikTok's risk assessment and risk mitigation measures in relation to civic discourse and electoral process – compliance with Articles 34 and 35(1) of Regulation (EU) 2022/2065

A. Questions related to risk assessments

13. Which measures did TikTok take to reinforce its internal processes, resources, testing, documentation, or supervision of any of your activities in particular as regards detection of the systemic risk related to civic discourse and electoral processes?

1. As required by Art 34 DSA, TikTok conducted a risk assessment to identify systemic risks stemming from the design or functioning of the TikTok platform, including risks related to civic discourse and electoral processes. TikTok refers the Commission to its Risk Assessment Report ("RAR") dated 29 September 2023, which describes the process it took for its first risk assessment. TikTok's risk assessment followed the methodology explained to the European Commission during the meeting on 20 June 2023. The information available in the RAR is, necessarily, a summary of the 'results' (as required by Art 42(4)(a) DSA) of TikTok's overall risk assessment.
2. TikTok considers that it had comprehensive and detailed measures in place to address the risks associated with civic discourse and electoral processes as at 28 August 2023. An overview of the key risk-mitigation measures in relation to elections and civic integrity is provided in the results of our risk assessments contained in our RAR at Table 3: TikTok's risk-mitigation measures in accordance with Art 35 DSA (a) to (k). TikTok has included details on these measures at paragraphs 5 to 7 below.
3. TikTok's RAR also set out key mitigation improvements identified as a result of the risk assessment process, including that TikTok will further expand its Fact-Checking Programme by on-boarding new European-based fact-checking partners and increasing its operational coverage in the EU. As part of this commitment, TikTok has onboarded new fact-checking partners and expanded the coverage of its programme.
 - a. TikTok is currently onboarding a new fact-checking partner in Portugal, expanding the coverage of the Fact-Checking Programme and increasing its fact-checking partnerships.
 - b. TikTok has engaged existing fact-checking partner, LeadStories, to provide coverage in Croatia, expanding the reach of the programme.
 - c. TikTok also onboarded Demagog Association as an official partner in its Global Fact-Checking Programme in October 2023 to provide coverage in Poland. Poland was previously covered by Deutsche Presse-Agentur ("DPA"), who remains engaged as a fact-checker covering Germany, Austria and the Netherlands. Prior to being engaged as a fact-checking partner, TikTok worked with Demagog Association in respect of TikTok's media literacy campaigns and Election Speaker series (for further information on these initiatives see responses to **questions A.13.i., B.d.26.i., B.d.27.i.** and **B.d.27.ii.**). Demagog Association is an IFCN-certified fact-checking organisation

based in Poland which focuses on verifying politicians' statements and false information with the aim of reducing the spread of fake news in social media.

4. TikTok will also continue its risk monitoring and vigilance by devoting resources on a priority basis to its processes for handling Election Misinformation risks.
5. Risks related to civic discourse and electoral processes are first detected by way of a global elections calendar and secondly via monitoring of the content and circumstances relevant to the election in each territory. This is done via TikTok's Elections Integrity Programme ("EIP").
6. TikTok's EIP was in place and operating prior to 28 August 2023. The EIP is a broad programme which is targeted towards identifying risks associated with election misinformation and ensuring the integrity of information on the TikTok platform as it relates to elections and electoral processes. As part of the EIP, TikTok assesses the risks posed by upcoming elections in the EU based on certain factors, such as: political stability, candidate safety, election significance, election interference record, relevant legal landscape and relevant market and TikTok factors (e.g. user numbers). Having assessed the relevant risks, TikTok then determines whether and what measures are appropriate in response to the risks identified. For example:
 - a. Measures in place generally include:
 - i. **Reporting mechanisms.** Reporting mechanisms are available enabling reports of potential election misinformation from various internal and external sources including TikTok's Trust & Safety Risk Analysis function, trusted flaggers, user reports, government reports, external threat intelligence partnerships, and escalations from our Communications team (for example in relation to new reports or questions from reporters).
 - ii. **Collaboration and knowledge sharing.** Cross-country collaboration and knowledge sharing so that regional and local teams can draw on and benefit from the experience, expertise and insights drawn from elections in other regions to ensure continuous improvement of the EIP.
 - iii. **Fact-Checking Programme.** TikTok works with IFCN-certified independent fact-checking partners across Europe who assist TikTok in verifying, labelling or removing content. TikTok refers the Commission to its responses to **question B.d.25.i., B.d.25.ii. and B.d.25.iii.** for further detail on its Fact-Checking Programme as it relates to its measures to protect election integrity.
 - b. Additional measures which may be implemented where relevant risks are identified under the EIP assessment process, may include:
 - i. **Mission Control Centre:** Creating a "mission control centre" with dedicated, knowledgeable individuals across different relevant TikTok teams to establish a centralised location for the handling of election misinformation issues in the run up to an election.

- ii. **Specialised training and guidance.** Arranging training from external local experts, such as DigiQ in respect of Slovakia and Demagog in respect of Poland, to provide insights and market expertise on key issues involved in and impacting the election and potential risks that may manifest on the TikTok platform to internal TikTok teams. Providing specialised training to moderators in advance of elections to enable them to spot relevant risks and content which may impact elections.
- iii. **Expert guidance.** Providing dedicated individuals with detailed knowledge on the country and election in question, including local language skills ("subject matter experts" or "SMEs") to support regional and local moderation teams for high risk elections.
- iv. **Election Hub and media literacy materials.** Creating "Election Hubs" on the platform which contain verified information regarding relevant elections, and resources created in partnership with digital literacy partners to educate users on how to detect misinformation and verify information they are seeing online. TikTok refers the Commission to its responses to **questions B.d.26.i., B.d.26.ii., B.d.27.i. and B.d.27.ii.** for further detail on its Fact-Checking Programme, Election Hub and media literacy campaigns.
- v. **Temporary fact-checking coverage.** TikTok can and does request temporary fact-checking coverage in additional languages if required via temporary agreements with fact checking partners. For example, in March 2022, TikTok swiftly put in place temporary fact-checking coverage with LeadStories for the duration of the Hungarian election (before implementing permanent coverage in Hungary). The ability to implement temporary fact-checking coverage complements TikTok's expanding relationships with fact-checking partners to provide more permanent coverage across the EU, allowing TikTok to flexibly respond to local market events across the EU.

7. With regard to recent elections:

- a. TikTok's EIP was applied to each of the Luxembourgish, Polish and Slovak elections.
- b. TikTok's EIP assessment process identified potential election integrity risks posed by the upcoming elections in Poland and Slovakia, in particular. Further detail on specific steps taken under the EIP in respect of these elections as a result is outlined in our responses to **questions A.13.i-ii., B.d.25.i-iii., B.d.26i-ii. and B.d.27.i-ii.**
- c. TikTok's EIP assessment process did not identify specific election integrity risks posed by the Luxembourgish elections, and no specific risks were raised by external or internal stakeholders. Where TikTok does not identify specific risks in relation to an upcoming election, we rely on our existing Trust & Safety capabilities, including the general measures outlined above, and are able to react to emerging risks and incidents. No incidents or escalations were identified during or after the election. Any escalations would have been dealt with by our Trust & Safety Incident

Management team, regional policy teams or our Civic Integrity Policy and Product team, depending on the severity of the escalation. As part of its usual measures under the EIP, TikTok worked with fact-checking partner Agence France-Presse ("AFP") to identify misinformation in relation to the election.

i. How did you take into account specific regional or linguistic aspects, for example as regards the use of your services in the context of the Slovak, Luxembourgish and Polish elections?

1. TikTok references the non-paper provided to the Commission on 8 September 2023 covering TikTok's approach to election preparedness in the context of the Slovak elections. The Commission will find this non-paper responsive in respect of the Slovak elections. It also provides an overview of TikTok's EIP, which is relevant to the Polish and Luxembourgish elections. Specific mitigation measures in respect of the Polish election were discussed with the Commission on 10 October 2023. Further details in respect of TikTok's approach around the Polish and Luxembourgish elections are set out below.
2. TikTok's Incident Response and advertisement risk teams conduct market specific risk assessments up to 15 months prior to an election taking place. These teams work to ensure proper risk mitigation steps are met, including by taking into account language resources, potential risks posed in each market and compliance with all market-specific political advertising regulations.
3. As explained in our September 2023 Transparency Report ("TR"), TikTok has regional Policy teams and Trust & Safety teams to ensure moderators are appropriately trained in the context of local customs, cultures and events, including elections. Our EMEA regional policy team ensures that global moderation policies are localised as appropriate for the particular context and jurisdiction. For large countries we have a policy country manager per country, for smaller countries one policy manager will cover a number of countries. This provides specialised knowledge and attention in relation to each country. The localised content moderation approaches mean that moderators are able to take a regionally informed approach to content moderation decisions. The EMEA regional policy team works with cross-functional teams to detect regional/local trends; engages with external experts, such as NGOs and civil society organisations, and government authorities.
4. TikTok has also established a number of specialist Trust & Safety moderation teams to assist moderators with respect to complex and evolving issues such around elections. Moderators are provided with enhanced training, expertise and tools to identify, for example, misleading content in the context of an election, including direct access to our fact-checking partners.
5. Our EMEA regional policy team works with external experts to draft policies and programmes in relation to local events such as elections. Our local teams worked with Demagog Association, DPA and BezpieczneWybory.pl initiated by the National Research Institute ("NASK") in advance of the Polish election.

6. We continue to actively cooperate with these external stakeholders in relation to election preparation including, the development of information panels with links to reliable and official sources of information about the electoral process, collaborating on media literacy campaigns and the development of our in-app intervention mechanisms.
7. As part of the EIP, TikTok may invite external local and / or regional experts to speak to the moderators and internal TikTok teams to share insights and market expertise which informs our approach to the upcoming election (the "**Election Speaker Series**"). For example, TikTok engaged Demagog Association in Poland in advance of the Polish election.
8. TikTok also refers the Commission to its responses to **questions A.13.ii., B.d.26. and B.d.27.** which are also responsive to this question.

ii. Please include an overview of the organisational set-up and human resources you have allocated for the Autumn 2023 general elections in Slovakia, Luxembourg and Poland, respectively, for assessing risks and mitigating them, expressed in terms of full-time equivalent (FTE) working within the company on election integrity for these elections specifically. This should include:

- a) The qualifications of these employees;**
- b) Please explain how you have determined the number of FTEs and the qualifications of staff needed for each of the three elections taken as examples here.**

1. TikTok refers the Commission to our response to **question A.13** above and our RAR (Table 3) which provide a description of the organisational set up of the EIP. TikTok's EIP is a highly cross-functional approach involving subject matter experts across a range of teams. Specifically this involves a range of regional stakeholders with in-depth market knowledge from TikTok's Trust & Safety, Legal, Government Relations and Public Relations, and Communications teams, who each bring a regional and local perspective.
2. TikTok considers there are many factors other than the quantity of human moderators that contribute to effective risk mitigation, and that the quantity of human moderators is not the most significant factor by which to measure risk mitigation.
3. We direct the Commission to our TR (Annex C) which details the number of dedicated content moderators with local language skills including Polish, Slovak, French and German. These numbers only reflect specific language moderators and not the non-language specific moderators (i.e. moderators who review profiles or photos). Non-language specific moderators are also relevant for combatting election misinformation on our platform.
4. Moderators are dedicated to reviewing content in the relevant language, and are provided with

additional election training prior to an election in a particular country, for details of which see further our response to **question A.13..**

5. In general, moderator resources are determined based on a number of factors including the volume of user reports, the volume of content flagged by automation (i.e., requiring human review) and other factors influencing workload. We also account for high-risk events that might cause a spike in content requiring human review through the forecasting process.
6. In relation to the Polish and Slovak elections TikTok assessed the relevant moderation team's capacity by factoring in current volumes of flagged content, anticipated volume growth, moderation handling time, and productive hours.

Qualification and training

7. Please refer to paragraphs 1 to 5 of our response to **question A.3.ii.** of RFI 1 and our TR (at Section 3) in relation to the structure and training of individuals involved in moderating content, which for the avoidance of doubt apply to moderation of the issues covered by this question.
8. To ensure a consistent understanding and application of TikTok policies, all content moderator personnel receive training across relevant policies, including on harmful misinformation by default. The Election Misinformation policy is active at all times, however, prior to and during certain local elections, personnel involved in reviewing reported electoral misinformation receive additional focused training on the scope of the election in question with related examples.
9. TikTok keeps all of its content moderation training under review to ensure that they are accurate and current. This training includes clearly defined learning objectives to ensure all content moderator personnel understand the core policy issues and their underlying policy rationale, key terms and policy exceptions (where applicable).
10. The measures taken as part of the EIP are designed to support and update TikTok's moderators and teams involved in detecting and mitigating against electoral misinformation.

iii. Please provide details on the detection and actions taken against coordinated inauthentic campaigns in the context of each of the two elections, including any internal documents regarding your assessments.

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1. TikTok detected and disrupted, via the suspension of relevant user accounts, one covert influence network during the period of Q3 and Q4 2023 in context of the Polish and Slovak elections. This network operated from Slovakia and targeted Slovakian audiences. The individuals behind this network created opaque accounts which engaged in inauthentic audience building methods to amplify anti-EU, anti-NATO and pro-Russian content in Slovakia.

- a. Detection Source: Internal
- b. Accounts in Network: 69
- c. Followers of Network: 2,154

2. In order to detect coordinated inauthentic campaigns TikTok reviews the behaviour of accounts, and interactions or links between accounts, to determine if any users are engaging in a coordinated effort to mislead TikTok's systems or our community. TikTok uses both open-source and internal information to assess covert influence operations.
3. TikTok reports on covert influence operations in its quarterly Community Guidelines Enforcement Reports.

14. On the basis of Article 34(3) of Regulation (EU) 2022/2065, the Commission requests TikTok to submit the documents underpinning the risk assessments of TikTok with respect to civic discourse and elections, notably all studies and evidence used for determining inherent risks, results of all tests, studies and internal assessments for the choice of the controls and assessing and monitoring their effectiveness, including documents on the testing of recommender systems as well as any further studies and internal documents underpinning the assessment of residual risks. Please submit the documentation used for the purpose of the risk assessment completed by 28 August 2023 pursuant to your obligation under Article 34(1) of Regulation (EU) 2022/2065.

1. As provided in our cover email accompanying our response to RFI dated 4 November 2023, TikTok has prioritised providing substantive responses to the questions in the RFIs as we expected that this would be the most beneficial for you in the immediate term. We will now turn to and process the requested documentation responsive to RFI 2 and provide this to the Commission by the end of November alongside documentation provided in response to RFI 1 and RFI 3.

B. Questions related to TikTok's policies as risk mitigation measures in relation to civic discourse and electoral processes systemic risks (Article 35(1) of Regulation (EU) 2022/2065) - please reply to the following questions focusing on the example of the recent Slovak, Luxembourgish and Polish elections, respectively, within the geographical scope of the European Union.

a. Incidents of election misinformation / voter suppression or dissuasion to vote.

15. Please provide the performance metrics and describe the internal controls you use for your efforts to detect infringements of your policy for 'Election Misinformation' (13).

1. TikTok takes a range of measures to combat Election Misinformation including through enforcement of the Election Misinformation policy and activities of the EIP (for which see response to **question A.13.**).
2. To do so, TikTok has implemented automated and manual content moderation systems and processes as well as a range of other safety features that are developed, maintained and applied by a range of teams.
3. **Automated detection:** TikTok conducts real-time automated moderation of uploaded content for violation of the Community Guidelines, including TikTok's Integrity & Authenticity policies, which strictly prohibit election misinformation. This involves the use of machine learning models to flag potentially harmful material for human review. To assist with manual review, TikTok's Trust & Safety Integrity & Authenticity Issue Policy team maintains a repository of fact-checked information and consults partners in its Global Fact-Checking Programme to help accurately and efficiently assess the veracity of suspected Election Misinformation. This database is updated on an ongoing basis to include information that has been assessed and determined by our external fact-checking partners to be verifiably false or misleading.
4. **Manual detection and review:** Manual detection occurs through the measures set up under the EIP including "mission control centres" established for high risk elections (see response to **question A.13**). As set out in response to **question B.7.i.** of RFI 1, manual review can be triggered by popularity of content, user reporting, notices from fact-checking partners, trusted flaggers and other trusted partners onboarded for the purpose of flagging election misinformation such as such as Demagog and DigiQ in respect of Poland and Slovakia which are reviewed on a priority basis, targeted sweeps or keywords or content by the Trust & Safety team based on identified emerging risks.
5. **Robust quality assurance and review processes:** The content moderation process is also subject to an ongoing internal quality assurance process to detect inaccuracies and to facilitate real time monitoring. This involves a range of methods including sampling, simulation, moderator appeals, and targeted coaching. Automated methods are subject to human review and oversight; rates of false positives and false negatives are kept under continuous review.

Key data points

6. TikTok carried out a comprehensive update to its Community Guidelines, which took effect in

April 2023, as set out in our Q2 2023 Community Guidelines Enforcement report. The updated guidelines provide the TikTok community with more transparency about our rules and how we enforce them. After consulting with more than 100 organisations globally, TikTok overhauled how it organises the policies, simplified the language used, and added granularity to help everyone, from creators to researchers, easily access the information they need. This update included providing additional granularity to the Integrity & Authenticity policies. Our Integrity & Authenticity policies previously consisted of the Harmful Misinformation and Spam & Fake Engagement policies. Following the update, our Integrity & Authenticity category is separated into six policies including our Civic and Election Integrity, Misinformation and Synthetic and Manipulated Media policies. Harmful Misinformation is no longer a distinct policy, but is dealt with across the new suite of Integrity & Authenticity policies. These changes impact the data TikTok is able to provide responsive to certain policy enforcement measures.

7. The best data available is from our Q2 2023 Community Guidelines Enforcement report, which highlights, in Q2 2023, globally:
 - a. For content violating our Civic and Election Integrity policies:
 - i. 97.6% was removed proactively
 - ii. 86.6% was removed before any views
 - iii. 75.2% was removed within 24 hours
 - b. For content violating our Misinformation policy, globally:
 - i. 94.9% was removed proactively
 - ii. 78.8% was removed before any views
 - iii. 61.7% were removed within 24 hours
 - c. **General conspiracy theories and unverified information related to an emergency or unfolding events.** In cases where fact checks are inconclusive, especially during unfolding events, content may not be removed and may instead become ineligible for recommendation into the For You Feed ("FYF") to limit the spread of potentially misleading information. As published in TikTok's Report on the Code of Practice on Disinformation – for the period 1 January 2023 - 30 June 2023 ("CoPD Report"), in H1 TikTok has made ineligible for the FYF 74,459 videos in relation to general conspiracy theories and unverified information related to an emergency or unfolding events in the EEA.
8. **Violating content: video view rate.** In H1 2023 as indicated in TikTok's CoPD, TikTok's metrics show that fewer than 2 in 10,000 views in the EU occurred on content that had been identified and removed for violating TikTok's policy on Harmful Misinformation.
9. **Violating ads.** TikTok prohibits paid political promotion, political advertising, or fundraising by politicians and political parties (for themselves or others). TikTok has removed 390 ads in the

EU for violating TikTok's ads policies under the political content ad policy in H1, as indicated in TikTok's CoPD Report. 49 ads were removed in Poland in this period. No breaches of TikTok's political content ad policy were identified in Slovakia or Luxemburg. This indicates the efficacy of TikTok's measures regarding ads, and our approach to prohibit political ads.

10. Additional metrics in CoPD Report: We refer the Commission to TikTok's CoPD Report for additional metrics on TikTok platform design features such as the "consider before you share" prompt, user numbers indicating users that engaged with filtered hashtag settings, clicked on "not interested" (Measure 19.2), and engagement with election-focused media literacy measures/campaigns (Measure 17.2.1).

16. Please provide a timeline of the total daily content moderation decisions for your policies for 'Election Misinformation' as of 28 August 2023 or, if available, for the 6 months leading up to the respective elections.

1. TikTok is concerned that this question is disproportionately broad and onerous. We would be grateful to discuss this with you. In the meantime, we have provided the following data which we consider is sufficient to provide the Commission with an understanding of TikTok's mitigation measures and consider that daily data is not required or useful in assessing such mitigation measures.
2. The best available data in response to **question B.a.16.** is as follows: in Q2 2023 TikTok removed 23,864 videos globally for violating our Civic and Election Integrity policies and 349,937 videos for violating our Misinformation policy. This is limited to videos that have been reviewed and removed by human moderators.
3. TikTok also refers the Commission to our response to **question B.a.15.** which provides additional moderation metrics.

17. Please report on the data and internal metrics you employ to measure the effectiveness of the policy for 'Election Misinformation' as a risk mitigation measure and provide any internal documents regarding the implementation of your policy.

1. The best data available on the effectiveness of the Election Misinformation policy and implementation of this policy, is outlined in our response in relation to **question B.a.15.** which is also responsive to this question.
2. As highlighted in our response to **question A.13.**, to ensure that TikTok's Election Misinformation policy is effective and addresses local risks in the context of a specific election, TikTok provides local election moderation guidance to moderators in Poland and Slovakia to support with the detection of Election Misinformation and other violations of TikTok's Community Guidelines during the election window.

18. Please explain the average time and notable outliers for processing notifications received under your terms and conditions with respect to violations of the 'Election Misinformation' policies.

1. The best data available is provided in response to **question B.a.15.** which indicates the percentage of violative content that was removed in under 24 hours.
2. In the context of election misinformation, some reports may take longer to action due to the need for more in-depth assessment of potential misinformation claims. These checks are generally performed by our fact-checking partners. We place particular emphasis on ensuring our measures are reasonable, proportionate and effective, to ensure that they do not unduly impact freedom of expression beyond what is necessary (having particular regard to the importance of political speech/debate/comment), as such taking account of these considerations could further impact the response time in certain instances.

b. Incidents of hate speech

19. Please provide the performance metrics and describe the internal controls you use for your efforts to detect infringements of your policy for hate speech.

1. We understand that this question requests TikTok to describe its internal controls and provide metrics in detecting hate speech in the context of the elections. In that context, TikTok does not delineate between hate speech identified in the context of elections and hate speech identified more generally. As such the data and information responsive to this **subsection b** relates to the detection and mitigation measures in place in respect of all hate speech on the TikTok platform.
2. The best data available is from our Q2 2023 Community Guidelines Enforcement report, which highlights, for content violating our Hate Speech and Hateful Behaviour policy globally:
 - a. 89.9% is removed proactively;
 - b. 76.8% is removed before any views; and
 - c. 87.4% is removed within 24 hours.
3. The data above is the most recent such data and is therefore additive to the last disclosure of these data points contained in TikTok's RAR.

Detection of infringements of TikTok's hate speech policy

4. As covered in response to **question B.a.15,** TikTok has implemented automated and manual content moderation systems and processes to detect infringements of our Community Guidelines, as well as a range of other safety features that are developed, maintained and applied by a range of teams. These systems operate across all Community Guidelines.

TikTok has provided additional information in the context of hate speech below.

5. **Automated Review:** As described in response to **question B.a.15.**, TikTok conducts real-time automated moderation of uploaded content for violation of the Community Guidelines, including our Hate Speech and Hateful Behaviour policy. TikTok also uses keyword lists and models to review text and audio content to detect potentially harmful material. TikTok works with various external parties to keep its keyword lists pertaining to Hate Speech up to date. TikTok also employs deduplication measures and maintains a database of URL hyperlinks, which have been found to be associated with previously detected hate speech to assist identification of violative content. Information in user account profiles, such as a profile photo, nickname, user handle, and user bios are reviewed automatically to identify profiles that promote, support or contain hate speech.
6. **Review of Livestream visual content:** Automated filters review frames of the Livestream content at intervals of several seconds. If suspected hate speech is detected, such content is flagged for Manual Review.
7. **Manual Detection and Review:** Content may be flagged for Manual Review through manual detection measures as described in response to **question B.7.i.** of RFI 1, including via user reports, internal TikTok teams (including from the Policy and Risk Analysis teams and the Incident Management) Team, the Community Partner Channel, police units in EU member states through TikTok's Law Enforcement Outreach team. Content is also identified via targeted 'sweeps' of specific types of content. For example, this may involve a targeted sweep focused on use of a specific keyword, URL or hashtag identified as being associated with high risk content, such as where certain content is "viral".

20. Please provide a timeline of the total daily content moderation decisions for your policies for hate speech as of 28 August 2023 or, if available, for the 6 months leading up to the respective elections.

1. TikTok is concerned that this question is disproportionately broad and onerous. We would be grateful to discuss this with you. In the meantime, we have provided the following data which we consider is sufficient to provide the Commission with an understanding of TikTok's mitigation measures and consider that daily data is not required or useful in assessing such mitigation measures.
2. The best available data in response to **question B.a.20.** is as follows: in Q2 2023 TikTok removed 2,346,898 videos globally for violating our Hate Speech and Hateful Behaviour policies. This is limited to videos that have been reviewed and removed by human moderators.

21. Please report on the data and internal metrics you employ to measure the effectiveness of the policy for hate speech as a risk mitigation measure and provide any internal documents regarding the implementation of your policy.

1. The best data available on the effectiveness of the Hate Speech and Hateful Behaviour policy and implementation of this policy, is outlined in please see our response in relation to **question B.a.19.** which is also responsive to this question.
2. Content found to violate TikTok's Community Guidelines for containing hate speech is removed from the platform on a global basis and certain violations will result in account suspension or termination. Enforcement of TikTok's Community Guidelines is explained to users in our online Help Centre. In addition, users can report "illegal hate speech" under its illegal content reporting tool, as required under DSA Art 16, reported content is then reviewed by our moderation team.
3. To assist implementation and enforcement of the hate speech policies our Trust & Safety teams follow processes to determine if a group is a hate organisation or has a hateful ideology. This is used to implement effective detection and moderation strategies. Our detection and moderation strategies involve identifying organised hate groups, associated individuals, symbols and slogans. TikTok may also take off-platform behaviour into consideration, for example taking into account the identity of an account holder where that individual is a leader of a known hate group. In addition we maintain a list of slur terms which is updated on an ongoing basis and informed by our local country-level policy teams, in order to ensure that the terms included are appropriate in light of local linguistic and cultural norms.

c. Synthetic and Manipulated Media

22. In its risk assessment report, TikTok refers to its policy on Synthetic and Manipulated Media as a risk mitigating measure. Please provide the performance metrics and describe the internal controls TikTok uses for its efforts to detect infringements of your policy for 'Synthetic and Manipulated Media'.

1. The emergence of synthetic and manipulated media, and the potential risk that this creates, is a nascent area of digital technology. TikTok has flagged that it considers that generative AI is an emerging risk in its RAR. TikTok was one of the first platforms to develop systems to deal with this type of media, as set out in the Executive Summary of the RAR. As outlined in our response to **question B.9.i.** of RFI 1, we are continuously exploring new products and initiatives to help enhance our detection and enforcement capabilities in relation to synthetic media that may mislead the public, and we keep our policies and approach relating to synthetic and manipulated media under review given the continuous updates and developments in this area.
2. TikTok has implemented technical solutions that help flag potentially violative, including synthetic media, content. These tools flag content which is then escalated for manual review. Content can also be reviewed and escalated internally by employees or external actors, such

as via NGOs, fact checkers or media reports. As a result TikTok removes violative content through manual human review only. We continue to iterate our approach to this area.

3. When a piece of potentially violative content is flagged by automated tools, an internal or external reporter, TikTok will search for duplicate content, including via sweeps carried out by our Incident Management team, and remove it if we determine that it is violative of our policy. To prevent new, similar violative content appearing on the TikTok platform, TikTok has leveraged identified violative videos to create machine learning rules to auto-action identical / similar content.
4. In addition, TikTok automatically labels content made with TikTok tools, for example filters for user-generated content, that has been significantly edited or wholly generated by AI. TikTok also requests, via the Community Guidelines, that users proactively label uploaded content that has been significantly altered or modified by AI technology. TikTok also provides users with a dedicated toggle that can be used to identify AI content.
5. TikTok is continuing to work across industry and civil society to develop content provenance practices. In addition TikTok was one of the first platforms to develop a coherent policy to deal with synthetic and manipulated media, as well as the first to create a labelling tool to enable users to adhere to this policy with greater ease.
6. TikTok first reported on data in relation to the Synthetic and Manipulated Media policy in our Q2 2023 Community Guidelines Enforcement report. This is the best data available and highlights, for content violating our Synthetic and Manipulated Media policy globally:
 - a. 98.4% is removed proactively;
 - b. 96.6% is removed before any views; and
 - c. 94.4% is removed within 24 hours.

Detection of infringements of TikTok's 'Synthetic and Manipulated Media' policy

7. Please refer to the Manual Review portion of our response to **question B.a.15.** which is also responsive to this question.

23. Please provide a timeline of the total daily content moderation decisions for your policy for 'Synthetic and Manipulated Media' as of 28 August 2023 or, if available, for the 6 months leading up to the respective elections.

1. TikTok is concerned that this question is disproportionately broad and onerous. We would be grateful to discuss this with you. In the meantime, we have provided the following data which we consider is sufficient to provide the Commission with an understanding of TikTok's mitigation measures and consider that daily data is not required or useful in assessing such mitigation measures.
2. The best available data in response to **question B.c.23.** is as follows: in Q2 2023 TikTok removed 1,796 videos globally for violating the Synthetic and Manipulated Media policies. This is limited to videos that have been reviewed and removed by human moderators.

24. Please report on the overall effectiveness of the policy for 'Synthetic and Manipulated Media' as a risk mitigation measure and provide any internal documents regarding the implementation of your policy.

1. TikTok refers the Commission to our response to **question B.c.22.** and **question B.c.23.** which are also responsive to this question.

d. Other questions in relation to elections

25. In its risk assessment report, TikTok refers to the Fact-Checking Programme, with IFCN-certified independent fact-checking partners across Europe who assist TikTok in verifying, labelling or removing content, as a specific mitigation measure.

i. Please provide the performance metrics and describe the internal controls TikTok uses for the Fact-Checking Programme.

1. TikTok provides fact-checking capabilities in 17 official European languages including French, German, Slovak and Polish, and has fact checking coverage in more than 100 countries globally including Poland, Luxembourg and Slovakia, as disclosed in TikTok's CoPD Report (Measure 30.1).
2. As of October 2023, TikTok partners with 16 IFCN-accredited fact-checking organisations globally including Lead Stories which provides coverage for Slovakia; Demagog Association which as of October 2023 provides coverage in Poland, replacing DPA that previously covered Poland; and AFP which provides coverage in Luxembourg. For the avoidance of doubt, DPA remains engaged and as official fact-checker covering Germany, Austria and the Netherlands.
3. The best available data in relation to the Fact-Checking Programme is provided below.

This data relates to the Fact-Checking Programme in general rather than the use of the Fact-Checking Programme in respect of the particular elections. TikTok does not have access to specific data relating to the Fact-Checking Programme in the context of the particular elections.

4. During H1 2023, 10,181 videos were fact-checked in the EU. Of the 10,181 videos that were fact-checked in the EU during this period, 2,848 were removed as a result of the fact-checking assessment.
5. Where fact-checkers provide TikTok with an inconclusive or unconfirmed determination in relation to a piece of content, TikTok uses an “unverified content” label and may make the video ineligible for recommendation in the FYF. The following metrics are available in TikTok's CoPD Report:
 - a. During H1 2023, 76,094 videos were tagged with the unverified content label in the EU.
 - b. During H1 2023, the percentage of users in the EU, who after having seen the “unverified content” label, did not share the video was 29.93%.
 - c. During H1 2023, 74,315 videos were made ineligible for the FYF under the relevant Integrity & Authenticity policies in the EU.
6. TikTok's partnerships with IFCN-certified fact-checking partners enable TikTok to identify potential misinformation and take action on it. Assessments from fact-checking partners provide valuable input which helps TikTok take appropriate action against violative content.
7. In addition to reporting on and assessing potential misinformation, TikTok partners with professional fact-checkers to improve our detection and enforcement on misinformation through:
 - a. a proactive detection programme with fact-checkers who flag new and evolving claims they're seeing across the internet. This allows TikTok to look for these claims on our platform and remove violations (targeted sweeps).
 - b. a database of previously fact-checked claims to help misinformation moderators make swift and accurate decisions.
8. TikTok selects, trains and onboards fact-checking partners to ensure that partners are sufficiently qualified and able to perform the required fact-checking tasks. In addition TikTok maintains open lines of communication with fact-checking partners to answer questions and resolve issues.
9. TikTok trains moderators that are involved in the moderation of content that potentially contains misinformation. This training includes how to identify content that may require fact-checking and how to initiate the fact-checking process in line with TikTok's Community Guidelines.
10. TikTok ensures that all moderation decisions are made by TikTok in accordance with our Community Guidelines, and that fact-checkers do not directly moderate content on the

platform. This provides TikTok with overall control and oversight of the moderation process.

11. All contracts with fact-checking partners include clauses that enable TikTok to request additional services in certain cases such as crises or important events.
12. TikTok provides fact-checking partners with training on the format and structure TikTok expects the results of fact-checking reviews to be submitted to it to ensure consistency. TikTok conducts spot checks to confirm that fact-checking partners are adhering to TikTok's guidance. TikTok also requests feedback from internal Trust & Safety teams in relation to whether the format and structure of the results of the reviews conducted by fact-checking partners align with TikTok's guidance.

ii. Please provide a timeline of the total daily amount of content that received a Fact-Check label or was removed under this policy as of 28 August 2023 or, if available, for the 6 months leading up to the respective elections.

1. TikTok understands the Commission's question to be directed at understanding the number of content moderation decisions on a daily basis in each of Poland, Slovakia and Luxembourg since 28 August 2023 or, if available, for the 6 months leading up to the respective elections.
2. TikTok is concerned that this question is disproportionately broad and onerous. We would be grateful to discuss this with you. In the meantime, we have provided the information in response to **question B.d.25.i.** which we consider is sufficient to provide the Commission with an understanding of TikTok's mitigation measures and consider that daily data is not required or useful in assessing such mitigation measures.

iii. Please provide any internal documents regarding the implementation of the Fact-Checking Programme during the respective elections.

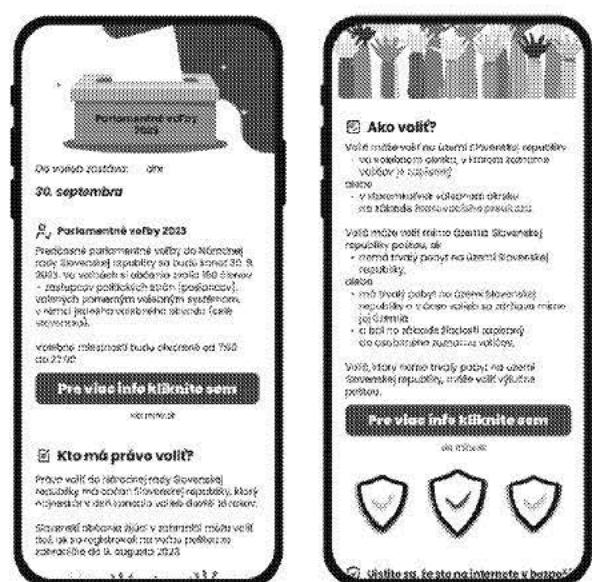
1. TikTok followed its usual fact-checking processes during the Polish, Slovak and Luxembourgish election periods. These processes are in place continually throughout the year and we determined it was not necessary for them to be altered in light of the elections in question. These fact-checking processes include escalating potential misinformation videos to fact-checking partners to request their assessment about the veracity of the content such that TikTok's moderation and policy teams could determine if the escalated videos violated the Community Guidelines. Fact-checking partners are also expected to proactively submit to TikTok potential misinformation videos they identified on the platform.
2. No additional internal documentation was prepared in respect of the Fact-Checking Programme during the respective elections.

3. TikTok also refers the Commission to its response to **question B.d.25.i.** which is also responsive to this question.

26. In its risk assessment report, TikTok refers to in-app interventions for users to direct them to authoritative content, like the “elections hub”.

i. Please provide the performance metrics and describe the internal controls TikTok uses for this “election hub”.

1. Our election hub tool is designed to provide users with access to information on upcoming elections from authoritative sources. This typically includes: (i) information about the election process, including when to vote, where to vote and the process of voting; and (ii) information intended to improve media literacy by educating users on how to detect misinformation and verify information they are seeing online.
2. We direct users to information on our election hub tool using election-related keywords:
 - a. **Video Label:** Where a video title includes an election-related keyword, we apply a label to the video which directs users to our election hub.
 - b. **Search:** When users include election-related keywords in searches, we serve a banner which directs users to our election hub.
3. We implemented our election hub tool for users in Slovakia and Poland during and in the run up to the recent elections. As described in our response to **question A.13.**, based on the lower risk identified in relation to the recent election in Luxembourg, we did not introduce a specific election hub for users in Luxembourg.



Redacted

Example of information contained in our elections hub for the recent Slovak election



Example of information contained in our elections hub for the recent Polish election

4. To ensure the information contained within the election hub is accurate, TikTok identifies information from official government sources and partners with digital literacy organisations. For example:

- a. For the recent Slovak election:
 - i. The election hub contained information from official Slovak governmental web-resources based on recommendations from the Ministry of the Interior of the Slovak Republic.
 - ii. TikTok partnered with the media literacy organisation, DigiQ, to produce educational videos for Slovakian users (available via the election hub). These videos were designed to help Slovakian users to detect misinformation and verify information they see online. The election hub also included links to authoritative information on DigiQ's website.
- b. For the recent Polish election:
 - i. The election hub contained information from official Polish governmental web-resources.
 - ii. TikTok partnered with the media literacy organisations, Demagog Association and FakeNews.pl, to produce educational videos for Polish users (available via the election hub and from the TikTok accounts of Demagog Association and FakeNews.pl). These videos were designed to help Polish users to detect misinformation and verify information they see online. The election hub also

included links to authoritative information on the website of Demagog Association and FakeNews.pl.

5. Information on the performance metrics for the election hubs, including number of users reached and average time spent on the election hubs is set out in our response to **question B.d.26.ii.**.

ii. How many users interacted with the “election hub” and how much time was spent on the hub on average?

1. TikTok is able to provide approximate numbers in response to **question B.d.26.ii.** as follows:
 - a. For the Polish election hub, from 18 September - 16 October 2023:
 - i. There were over **696,000** visits to the election hub.
 - ii. There were over **518,000** unique user visits to the election hub.
 - iii. On average users stayed on the election hub for **14.1** seconds.
 - b. For the Slovak election hub, from 4 September - 3 October 2023:
 - i. There were over **67,000** visits to the election hub.
 - ii. There were over **46,000** unique user visits to the election hub.
 - iii. On average users stayed on the election hub for **13.8** seconds.

27. In its risk assessment report, TikTok mentions that it may conduct on and off app media literacy campaigns.

i. How big was the reach of this campaign for the Slovak, Luxembourgish and Polish elections?

1. As set out in our response to **question B.d.26.i.**, for both the Slovak and Polish elections, we partnered with media literacy organisations to create media literacy campaigns featured within our election hubs.
2. The data included with our response to **question B.d.26.ii.** indicates the reach of those campaigns:
 - a. there were over 518,000 unique user visits to the Polish election hub; and

- b. there were over 46,000 unique user visits to the Slovak election hub.
- 3. As described in our response to **question A.13.**, based on the lower risk identified in relation to the recent election in Luxembourg, a media literacy campaign was not organised for the Luxembourgish elections.

ii. What are your performance metrics for this media literacy campaign besides the number of users reached?

- 1. TikTok does not use performance metrics for these media literacy campaigns, besides the number of users reached, as described in response to **question B.d.27.i.**

28. Please provide an assessment of the lessons learned from the recent elections in Slovakia, Luxembourg and Poland, and please explain how you have incorporated these lessons into your risk mitigation measures for future elections. Please provide any internal documents regarding any evaluation of your risk mitigation strategy for the Slovak, Luxembourgish and Polish elections.

- 1. We understand the Commission's question to be requesting information on the outcome of TikTok's review and risk assessment process in relation to the recent elections in Slovakia, Luxembourg and Poland. The measures TikTok had in place to address the risks in relation to the recent elections in Slovakia, Luxembourg and Poland performed as expected and no concerns have been raised to date.
- 2. As a general point, TikTok continually reviews and updates its detection and mitigation measures in respect of election misinformation including by keeping policies under review.

Exhibit 8

[H1 2024 Update - Executive Summary] TikTok Community Guidelines

Authored by: [REDACTED] Redacted // Last updated: March 20, 2024

Please refer to the final copy for publishing here:

[HYPERLINK]

Executive Summary

To help ensure a safe, trustworthy, and vibrant experience, we maintain a set of Community Guidelines (CG) that include rules and standards for using TikTok. We evolve them to address emerging risks and potential harms that may occur from new behaviors. We last updated the CGs in [HYPERLINK]

There is an update to the CGs that will launch on **April 17, 2024**, with an effective date of **May 17, 2024**. This update, which was advised by the legal team, is mainly related to compliance with the **Digital Services Act (DSA)**, and will ensure that all policies are transparently reflected in the CGs.

To prepare for this update, we implemented a CG Discovery Phase which included (1) Conducting a [HYPERLINK]

[REDACTED] with Product Policy teams; (2) [HYPERLINK]

[HYPERLINK]

[REDACTED] HYPERLINK

[REDACTED] with Legal; (3) [HYPERLINK]

[REDACTED] HYPERLINK

[REDACTED]
[HYPERLINK]

[REDACTED]
[HYPERLINK]

[REDACTED] of the last CG update with Data Science; and (4) Conducting [HYPERLINK]

[REDACTED] with Product.

The CG Discovery Phase resulted in the following updates:

- a. adding 9 new policies in the CGs that were launched over the last year, with a primary focus on Election-related and mental health policies
- b. rewriting several sections for improved clarity
- c. updating or adding new definitions/refining language of existing policies
- d. disclosing more information to enhance transparency, and
- e. improving general readability & accessibility

The updated copy of the CGs can be found here: [HYPERLINK]

Key Changes

new

A) New Policies (launched since the last CG update)

1. ***Marginalizing Speech and Behavior:*** Addresses content that uses coded statements to indirectly demean protected groups or normalize their inequitable treatment (result = FYF Ineligible)
2. ***Election Misconduct:*** Addresses content that encourages interference of, illegal participation in, or calls to disrupt a legitimate outcome of an election, such as through a coup (Result = Remove)
3. ***Civic Harm Misinformation:*** Addresses misinformation that undermines public trust in the integrity of the democratic process (Result = FYF Ineligible)
4. ***Hacked Materials:*** Addresses content related to the distribution of confidential information obtained without consent and shared with the public (Result = Remove)
5. ***Moderate Harm Misinformation:*** Addresses a range of content, including misinfo on treating moderate illnesses, media presented out of context to mislead on topics of public importance, and misrepresenting authoritative information, such as scientific data (Result = FYF Ineligible)

6. ***Disordered Eating:*** Addresses content related to extreme weight loss (result = FYF Ineligible, Restricted 18+)
7. ***Overgeneralized Mental Health:*** Addresses content related to overgeneralized mental health information that would be problematic if viewed in clusters, such as a quiz that claims to diagnose someone (Result = Dispersed in FYF)
8. ***Harmful body idealization:*** Addresses content related to promoting idealized body types (Result = FYF Ineligible, Restricted 18+)
9. ***Weight management:*** Addresses content facilitating the trade of harmful weight management products (Result = Remove)

memo

B) Significant Section Rewrites (to refine the way that we discuss our policies and specific topics)

1. ***Hate Speech and Hateful Behavior:***
 - a. Refined the way we discuss protected attributes and slurs
 - b. Updated exceptions and added examples of the rules, with specific examples that are relevant for antisemitism and islamaphobia
2. ***Edited Media and AI-Generated Content:***
 - a. Changed from "synthetic and manipulated media" to "AIGC and edited media" (as it is more commonly used now)
 - b. Clarified that we take down the likeness of private (non-public) figures, if we become aware it was used without permission (previously it lacked this qualifier, which risked a lot of overkill)
 - c. Added a required disclosure callout to encourage use of the recently deployed [HYPERLINK "<https://support.tiktok.com/en/using-tiktok/creating-videos/ai-generated-content>"] feature
3. ***Commercial Disclosure and Paid Promotion:***
 - a. Refined the way we discuss this topic area (including using the term "market" instead of "promote")
 - b. Updated the introduction section and definitions (including removing the "branded content" term and definition)
 - c. Clarified the rules and added a required disclosure callout box
4. ***TikTok LIVE:*** Disclosed additional information related to LIVE features, multi-guest LIVE, discoverability of LIVE content, and LIVE account policies

bulb

C) Updated or New Definitions/Refined Language

1. *Updated or added definitions:*

- a. Safety & Civility - Child sexual abuse material (CSAM); Grooming, Sexual harassment; Image-based sexual abuse; Public and Private figures; Material support (added "manifestos" as an example); Human trafficking
- b. Mental & Behavioral Health - Dangerous weight loss behavior; Potentially harmful weight management
- c. Sensitive & Mature Themes - Semi-nudity; Significant body exposure; Intimate body parts; Intimate kissing; Sexualized behavior; Sexualized framing; Sex product
- d. Integrity & Authenticity - **Covert influence operations; Public and Private figures; AI-generated content; Significantly edited content; Realistic-appearing scenes and people; Misleading AIGC or edited media; Likeness; Moderate harm health misinformation; Repurposed media; Misrepresented authoritative sources**
- e. Regulated Goods & Commercial Activities - Disclosures (commercial disclosure); Gambling-like activities; Alcohol/tobacco/drugs
- f. Public interest exceptions

2. *Expanded or clarified policy language & examples:* (1) Slurs and hate speech (including Transgender coverage); (2) Abuse and exploitation; (3) Dangerous activities or challenges; (4) Misinformation (including medical & climate change misinformation); (5) Civic and election integrity; (6) Covert influence operations; (7) Alcohol/tobacco/drugs; and (8) Public interest exceptions

mag_right

D) Enhanced Transparency Disclosure

1. Additional enforcement actions related to: (1) Hate, (2) Nudity and Body Exposure, (3) Sexually Suggestive Content, (4) Shocking and Graphic Content, (5) Misinformation, (6) Gambling, and (7) Tobacco
2. Additional enforcement actions related to non-short video Features - (1) TikTok LIVE, (2) Comments, (3) Direct Messages, and (4) Monetization - that violate our rules or don't meet our recommendations standards
3. Added a completely new section on Search to describe some of our key approaches, including when we implement search bans

4. Additional information related to Notice and Appeals
5. Quality assurance processes we use for some accounts that have already gone through additional validation processes, such as verified accounts (Decision Assurance)
6. Content suitability assessments which are provided by [HYPERLINK "https://www.sensical.tv/common-sense-networks/home" \h] for the [HYPERLINK "https://newsroom.tiktok.com/en-us/tiktok-for-younger-users" \h]

white_check_mark

E) Improved Accessibility

1. Updated the introductory sections - Overview, Community Principles, and Youth Safety and Well-Being - to make more digestible and easier to navigate (Overview now at 9th grade reading level)
2. Upgraded the webpage search function so you can search for any key words
3. Improved elements of visual design
4. Aligned and standardized language throughout the document
5. Updated section headings for clarity and parity
6. Added 6 new languages for translation (Hebrew, Albanian, Icelandic, Irish, Hindi, and Slovenian)

Detailed List of Key Changes

To ensure compliance with DSA, we disclosed more information about policy enforcement, with a focus on feature policies, and ensured all current policies were reflected. We also included several new policies that launched since the last CG update, and enhanced existing CG content for accuracy and clarification (new or updated definitions, more examples, etc.).

CG Section	Update	Details
GENERAL	Improved Accessibility	<ul style="list-style-type: none"> • Updated the introductory sections (Overview, Community Principles, and Youth Safety and Well-Being) to make them more digestible and easier to navigate, improved the Overview section readability to a 9th grade reading

		<p>level, and clarified our approach to content moderation in the Overview section</p> <ul style="list-style-type: none"> Upgraded the webpage search function and several elements of visual design Added 5 new languages for translation (Hebrew, Albanian, Icelandic, Irish, and Slovenian) Aligned and standardized language throughout the document Highlighted a quick guide to our Restricted 18+ content policies in the YSW section (removed other quick guides in the YSW section as they were found to be confusing) New definitions helped to update and streamline the rules and standards in the callout boxes
YOUTH SAFETY AND WELL-BEING	Enhanced Transparency	<ul style="list-style-type: none"> Disclosed that content suitability assessments are provided by [HYPERLINK "https://www.sensical.tv/common-sense-networks/home" \h] for the [HYPERLINK "https://newsroom.tiktok.com/en-us/tiktok-for-younger-users" \h]
COMMUNITY PRINCIPLES	Updated or New Definitions/Refined Language	<ul style="list-style-type: none"> Updated the term "rights" to the term "principles" in recognition that the content discussed throughout the section may not reflect global rights Removed links throughout the section that linked to specific Articles within Universal Declaration of Human Rights (a general link is still included in the intro section)
SAFETY AND CIVILITY	New Policy	<ul style="list-style-type: none"> <i>Marginalizing Speech and Behavior:</i> Addresses content that uses coded statements to indirectly demean protected groups or normalize inequitable treatment of those groups (FYF Ineligible)
	Significant Section Rewrite	<ul style="list-style-type: none"> <i>Hate Speech and Hateful Behavior</i>

	Updated or New Definitions/Refined Language	<ul style="list-style-type: none"> Transgender hate speech, slurs, CSAM, grooming, sexual harassment, image-based sexual abuse, public figures, private figures, material support (added "manifestos" as an example), and human trafficking Updated section headings for Exploitation and Abuse for clarity and parity: 1) Youth Sexual and Physical Abuse, 2) Adult Sexual and Physical Abuse, 3) Human Trafficking and Smuggling
	Enhanced Transparency	<ul style="list-style-type: none"> Clarified rule language for Harassment and Bullying
MENTAL AND BEHAVIORAL HEALTH	New Policy	<ul style="list-style-type: none"> Disordered Eating: Addresses content related to extreme weight loss (FYF Ineligible, Restricted 18+) Overgeneralized Mental Health: Addresses content related to overgeneralized mental health information that would be problematic if viewed in clusters, such as a quiz that claims to diagnose someone (Dispersion) Harmful body idealization: Addresses content related to promoting idealized body types (Result = FYF Ineligible, Restricted 18+) Weight management: Addresses content facilitating the trade of harmful weight management products (Result = Remove)
	Updated or New Definitions/Refined Language	<ul style="list-style-type: none"> Dangerous weight loss behavior, potentially harmful weight management, dangerous activities or challenges, semi-nudity, significant body exposure, moderate body exposure, light body exposure, intimate kissing, sexualized behavior, sexualized framing, sex products
	Enhanced Transparency	<ul style="list-style-type: none"> Disclosed additional enforcement actions for Sexually Suggestive Content, and Nudity and Body Exposure, including non-sexualized youth nudity of infants and toddlers Disclosed additional enforcement actions for fictional graphic violence, extreme physical fighting, and potentially distressing content

		(Restricted 18+)
INTEGRITY AND AUTHENTICITY	New Policy	<ul style="list-style-type: none"> • Civic and Election Integrity: Addresses content related to past election outcome misinformation (FYF Ineligible) • Edited Media and AI-Generated Content (AIGC): Introduces the AIGC label for realistic-appearing scenes or the likeness of real people, and discloses what is not allowed (even if labeled) • Hacked Materials: Addresses content related to the distribution of private, sensitive, or confidential information obtained from an individual or organization without consent and shared with the public. (Result = Remove) • Civic Harm Misinformation: Addresses misinformation that undermines public trust in the integrity of the democratic process (Result = FYF Ineligible) • Moderate Harm Misinformation: Addresses a range of content, including misinfo on treating moderate illnesses, media presented out of context to mislead on topics of public importance, and misrepresenting authoritative information, such as scientific data (Result = FYF Ineligible)
	Significant Section Rewrite	<ul style="list-style-type: none"> • <i>Manipulated Media and AI-Generated Content</i>
	Updated or New Definitions/ Refined Language	<ul style="list-style-type: none"> • Misinformation (including medical and climate change misinformation), covert influence operations, private figures, public figures, AI-generated content, significantly edited content, realistic-appearing scenes and people, misleading AIGC or edited media, likeness, current election, past election, moderate harm health misinformation, repurposed media, misrepresented authoritative sources
	Enhanced Transparency	<ul style="list-style-type: none"> • Disclosed additional enforcement outcomes related to health misinformation, unedited media, and misrepresented authoritative information (FYF

		<p>Ineligible)</p> <ul style="list-style-type: none"> Removed QR codes
REGULATED GOODS AND COMMERCIAL ACTIVITIES	Significant Section Rewrite	<ul style="list-style-type: none"> <i>Commercial Disclosure and Paid Promotion</i>
	Updated or New Definitions / Refined Language	<ul style="list-style-type: none"> Disclosures (commerical disclosure), gambling-like activities, and alcohol/tobacco/drugs
	Enhanced Transparency	<ul style="list-style-type: none"> Disclosed additional enforcement actions for: <ul style="list-style-type: none"> Showing or promoting gambling or gambling-like activities (FYF Ineligible, Restricted 18+) Promoting tobacco (FYF Ineligible, Restricted 18+)
ACCOUNTS AND FEATURES	Significant Section Rewrite	<ul style="list-style-type: none"> <i>TikTok LIVE</i>
	Enhanced Transparency	<ul style="list-style-type: none"> Added a new section on Search Disclosed additional enforcement actions for content that violates our rules or does not meet our standards for TikTok LIVE, Comments and Direct Messages, and Monetization Updated the 1-strike account ban list with most recent policies
ENFORCEMENT	Updated or New Definitions / Refined Language	<ul style="list-style-type: none"> Public interest exceptions
	Enhanced Transparency	<ul style="list-style-type: none"> Disclosed that we use additional quality assurance processes for some accounts that have already gone through additional validation

processes, such as verified accounts (decision assurance)

- Disclosed additional information related to Notice and Appeals, **including that information about restricted content will appear in the [HYPERLINK "https://www.tiktok.com/creators/creator-portal/en-us/tiktok-content-strategy/understanding-your-analytics/" \h]**.

Redacted

Exhibit 9



TikTok Technology Limited
Company Nr: 635755
Registered office: 10 Earlsfort Terrace,
Dublin, Ireland
D02 T380

From: **Redacted**
To: CNECT-DSA-Registry@ec.europa.eu

CONFIDENTIAL

5 April 2024

Dear Sirs

Please find attached the CONFIDENTIAL response of TikTok Technology Limited ("TikTok") to Section I of your Request for Information (Ref.Ares(2024)1961604 - 14.03.2024) (the "RFI").

This RFI response, and the Annexes thereto, contain confidential information and business secrets within the meaning of Article 6 of Commission Implementing Regulation (EU) 2023/1201. Such information is supplied to the Commission exclusively in relation to TikTok's compliance with Articles 34 and 35 of Regulation (EU) 2022/2065 (the "DSA"). Its publication or disclosure would harm the legitimate commercial interests of TikTok. Accordingly, it may not be published or disclosed to any third parties, including in response to any request pursuant to Regulation (EC) 1049/2001, without the prior written consent of TikTok.

As a preliminary note, concerning the request in the RFI that TikTok state its designated single point of contact for the purposes of Article 11 DSA, notwithstanding the existence of TikTok's Article 11 DSA email address (set out at paragraph 16 of TikTok's enclosed response), we are setting up an email alias for us to correspond directly with you. We shall advise you of this shortly.

With respect to TikTok's response to this RFI, in light of the Commission expressly highlighting (on page 6 of the RFI) the urgent character of the questions in Section I of the RFI, and explaining that the Commission will generally not grant extensions to the original deadline set, TikTok has used its best efforts to gather the information requested and respond to the Commission in the limited time available. In this regard, TikTok has prioritised providing answers to the questions in Section I and accordingly will follow up in due course with any further documentation relevant to its responses.

TikTok takes the issues raised in the RFI extremely seriously and, as always, we are willing to engage in a constructive dialogue with the Commission on this subject. To this end, we have diligently responded to the questions to the best of our ability in the time available. In this context, TikTok notes that it has offered on a number of occasions to discuss its Year 1 risk assessment process in detail with the Commission, and TikTok remains ready and willing to do so at the Commission's convenience.

We remain at your disposal should you have any questions.

Yours faithfully

Redacted

Enclosures

- RFI Response
- Annex I
- Annex II

TikTok Technology Limited's response to Section I of RFI
(Ref.Ares(2024)1961604 - 14.03.2024)
5 April 2024

Preliminary point

1. TikTok notes that the RFI has been issued (in part) pursuant to Article 67(1) of the Digital Services Act (the “**DSA**”) and states, *inter alia*, that “[t]he Commission has reasons to suspect that TikTok may not be compliant with Articles 34 and 35 of Regulation (EU) 2022/2065”. As an overarching point relevant to TikTok’s responses to both Sections of the RFI, TikTok respectfully stresses that it has complied fully both in letter and in spirit with Articles 34 and 35 DSA. Those Articles of the DSA require TikTok to conduct a diligent risk assessment process to identify, analyse and assess any systemic risks in the EU stemming from the design, functioning or use of its platform, and to put in place reasonable, proportionate and effective mitigation measures tailored to those specific systemic risks. TikTok considers that its Year 1 Article 34(1) DSA risk assessment (“**RA**”) process was diligent and thorough, for the reasons explained in detail further below, and that it has implemented appropriate mitigation measures tailored to the specific systemic risks identified pursuant to Article 34 DSA. TikTok therefore considers that it has fully complied, and continues to fully comply, with the requirements of Articles 34 and 35 DSA.

The Response

2. TikTok submits this response to Section I of the RFI as the legal entity that is the provider of the designated very large online platform (“**VLOP**”) TikTok (the “**Platform**”) in the EU.¹
3. TikTok understands the references to “*Generative AI content*” in the RFI as referring to realistic text, image, audio, or other content generated or modified by deep- or machine-learning processes.² For the remainder of this response, such content is generally referred to as “**AIGC**”.
4. To assist the Commission’s review of this response to Section I of the RFI, TikTok provides the following background regarding: (i) TikTok’s RA process, as well as information regarding how TikTok assessed AIGC in its Year 1 RA; and (ii) the measures that TikTok has in place to address AIGC-related risks.
5. First, TikTok classified AIGC as an emerging risk in its RA and considered its impact in a number of areas in its Year 1 Risk Assessment Report dated 29 September 2023 (“**RAR**”). In order to conduct the RA, TikTok established a comprehensive risk assessment process outlined in and guided by two key documents developed for this purpose: (i) the “*Online Safety Risk Management Policy Framework*” (the “**PF**”), a high-level policy framework that sets out the guiding principles and practices for TikTok to follow in the RA process; and (ii) the “*Risk Assessment Guidelines*” (the “**RAG**”), a detailed risk assessment methodology to serve as a benchmark in assessing whether, how and to what extent systemic risks may stem from the

¹ TikTok notes that the Commission also directed the RFI to ByteDance Limited. As explained in TikTok’s letter dated 15 March 2023, TikTok is a company incorporated in Ireland and the sole contracting entity for users in the EU. ByteDance Limited is the holding company of the ByteDance Group and is not the provider of the Platform in the EU.

² For example, the RFI refers to the Commission’s recently-finalised Election Guidelines (as defined in paragraph 7 below) as evidencing the “*new risks*” presented by Generative AI content (see RFI, p. 6). The Election Guidelines, in turn, focus on the risk that “*generative AI can be abused to mislead voters or to manipulate electoral processes by creating and disseminating inauthentic, biased, misleading synthetic content [...] regarding political actors, false depiction of events, election polls, context, or narratives*” and “*can also produce incorrect, incoherent, or fabricated information, so called ‘hallucinations’, that misrepresent reality, and which can potentially mislead voters*” (paragraph 36)). This broadly aligns with TikTok’s definition of “*synthetic media*”, as referred to in TikTok’s S&MM Guidelines (as defined in paragraph 10.b below).

design, functioning and use of the Platform. The PF and RAG are enclosed hereto as Annexes I and II.

6. TikTok specifically developed the RAG – informed by relevant risk management standards, such as ISO 31000 – to assist it in conducting the RA process required under Article 34 DSA in a diligent manner, and to ensure that this process follows a consistent, methodical, proportionate and balanced approach. As explained in Article 6.2 of the RAG, the RA process involves assessing systemic risks in discrete risk assessment modules (“**Modules**”), as appropriate, to ensure that each systemic risk is assessed in-depth and receives a sufficiently detailed, targeted and proportionate assessment. Appendix A of the RAG sets out a standard form template (the “**RA Template**”) to document each Module in a methodical manner.³
7. TikTok dedicated substantial resources and time to develop and design the RA process in order to meet the specific requirements of the DSA. Moreover, TikTok intends to continue to adapt this process as industry practice regarding the DSA develops and in response to relevant guidance that is issued (e.g., the recently-finalised Guidelines for providers of VLOPs and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes pursuant to the DSA (the “**Election Guidelines**”)), including any specific guidance that the Commission may ultimately issue regarding what it considers to be the appropriate approach to DSA risk assessments.
8. TikTok’s RA process in Year 1 involved 40 teams working over a period of 12 months, and ultimately resulted in TikTok identifying 4 systemic risk categories (“**Systemic Risk Categories**”). TikTok defined the Systemic Risk Categories having regard to Article 34(1) DSA (and the accompanying recitals). TikTok then broke down the identified Systemic Risk Categories into 17 ‘Risk Areas’ as follows:

Systemic Risk Categories	‘Risk Areas’
Dissemination of Illegal Content	<ul style="list-style-type: none"> ● Risks of child sexual abuse material and child sexual exploitation □ Risk of terrorist content ● Risk of illegal hate speech content ● Risks of gender-based violence content ● Risk of intellectual property infringing content
Risks & Opportunities for the Exercise of Fundamental Rights	<ul style="list-style-type: none"> ● Freedom of Expression / Information ● Privacy / Data Protection ● Non-discrimination ● Consumer Protection ● Human Dignity ● Private / Family Life

³ RAG, Section 6.3 & Appendix A.

Integrity & Misinformation	<ul style="list-style-type: none"> • Risk to elections and civic integrity • Risks to public health from medical misinformation • Risks to public security from harmful misinformation / content
Minor Safety	<ul style="list-style-type: none"> • Age Assurance • Age-Appropriate Content • Content Publication & Engagement
9. In addition to identifying the Systemic Risk Categories set out above, TikTok also classified AIGC as an emerging risk, ⁴ which TikTok was (and is) closely monitoring. Indeed, TikTok included a subsection in the Executive Summary of its Year 1 RAR dedicated to the emerging risk of AIGC, ⁵ which stated:	
<p><i>"TikTok is alert to the emerging risks of synthetic media, also known as generative AI. This technology makes it increasingly easy to create realistic images, video, and audio that can make it more difficult to distinguish between fact and fiction and the creation of illegal content, or can be used as part of image-based abuse.</i></p> <p><i>TikTok is closely monitoring the risks of generative AI and considered its impact in a number of areas contained in this Report. TikTok will continue work to improve its methods for detecting synthetic media at scale.</i></p> <p><i>TikTok has also taken proactive measures to mitigate generative AI risks in a reasonable and proportionate way:</i></p> <p><i>TikTok has created a policy prohibiting synthetic media showing realistic scenes that are not prominently disclosed or labelled in a video;</i></p> <p><i>TikTok does not allow any synthetic content of a real adult (with the exception of adults with a public profile) without that being disclosed and does not allow depiction of any real child, even if it contains non-violative content;</i></p> <p><i>Creators have the ability to label their content "Creator labelled as AI-generated" where it is either completely generated by AI, or significantly edited. Creators are required to do so if the content appears realistic and could mislead users; and</i></p> <p><i>Users are able to report content where they believe that it is undisclosed synthetic media or where synthetic media otherwise violates the Community Guidelines. For example, synthetic media that contains the likeness of any private natural person.</i></p> <p><i>The current state of the art of detecting synthetic media at scale is still limited. However, TikTok continues to engage with its peer platforms on</i></p>	

⁴ RAR, p. 8.

⁵ RAR, p. 8.

current and upcoming trends to further inform its approach to monitoring this emerging risk."

10. As a result, rather than classifying AIGC as a stand-alone Systemic Risk Category in and of itself, TikTok's RA process assessed the emerging risk of AIGC via various ways in which it may manifest in the Systemic Risk Categories that TikTok identified. This included considering the impact of AIGC in particular in the context of Sections B1 (Terms of Service / Community Guidelines) and C3 (Risk of intentional manipulation / inauthentic use / automated exploitation) of the RA Template when assessing the Systemic Risk Categories. For example, TikTok assessed the impact of AIGC in several sections of its Module for the Risk Area "*Risks to elections and civic integrity*", within the Systemic Risk Category of "*Integrity & Misinformation*", including in:
 - a. Section A1 (regarding AIGC of public figures such as government officials, politicians, business leaders or celebrities, which may impact on civic integrity if misused for political endorsements or other purposes);
 - b. Section B1 (regarding TikTok's policies on the moderation of election misinformation, including the "*Synthetic and Manipulated Media*" section of TikTok's Community Guidelines (the "**S&MM Guidelines**"));
 - c. Sections B2 and B3 (regarding TikTok's content moderation measures that generally apply to, and special teams that address, AIGC and election misinformation);
 - d. Section C3 (regarding the risks of intentional manipulation, inauthentic use and automated exploitation); and
 - e. Section F3 (setting out further recommendations for TikTok's commitment to continuous improvement in its risk management practices).
11. As explained in the RAR, TikTok's RA process concluded that election misinformation risk may arise from, e.g., attempts to share or disseminate on the Platform AIGC featuring public figures, if misused for political endorsements or other purposes.⁶ Accordingly, the RAR set out in detail several mitigation measures put in place by TikTok tailored to the risks to elections and civic integrity.⁷ As explained in Section 7 of the RAR, these mitigation measures included both: (i) those that have broad application, such as measures that apply to all election misinformation (which, as reflected in the RAR, can include AIGC); and (ii) those that are more narrowly focussed on AIGC only, such as clear policies relating to AIGC (namely the S&MM Guidelines) and TikTok's labelling practices and procedures for AIGC.
12. TikTok respectfully considers that its approach to assessing AIGC within the context of its Year 1 RA process – i.e., by assessing it through its potential impact on, or manifestation in, the Systemic Risk Categories (and related Risk Areas / Modules) that TikTok identified – was appropriate, diligent and compliant with the requirements of Article 34(1) DSA. This is particularly the case given that:
 - a. Article 34 DSA does not define AIGC as a systemic risk, or even reference it;
 - b. At the time of TikTok's RA process, AIGC was a relatively nascent, developing technology. TikTok shares the view expressed in the RFI and in the Commission's recently-finalised Election Guidelines that AIGC is a "*new technolog[y]*", and that only "[r]ecent technological

⁶ RAR, p. 29.

⁷ RAR, pp. 32-36.

developments in generative AI have enabled the creation and widespread use of artificial intelligence systems capable of generating [AIGC]⁸”;

- c. More fundamentally, AIGC as a technology is agnostic to how it is used. AIGC can take many forms, ranging from, on the one hand, entirely lawful and innocuous and / or positive to, at the other end of the spectrum, illegal and harmful. This contrasts with the systemic risks defined in Article 34(1) DSA, which are all illegal and / or harmful in and of themselves (i.e., the dissemination of illegal content, and the actual or foreseeable negative effects set out in that Article); and
- d. In any event, as reflected above, TikTok's classification of AIGC as an emerging risk in its Year 1 RA process meant that AIGC's impacts on the Systemic Risk Categories addressed in its Year 1 RAR were nonetheless considered and assessed as part of that process.

13. Second, although TikTok did not classify AIGC as a stand-alone systemic risk in and of itself, TikTok has implemented a variety of robust measures to mitigate AIGC-related risk, which TikTok continues to expand. These include: (i) the adoption and enforcement of the S&MM Guidelines (see **question I.A.1** below); (ii) the development of three forthcoming policies related to AIGC (see **question I.A.1** below); (iii) TikTok's involvement in partnerships and consortia relating to AIGC (see **question I.A.2** below); and (iv) introducing – as an industry first – groundbreaking tooling for the labelling of AIGC, including an automated label for content that uses AIGC features provided by TikTok (the “**Automated AIGC Label**”) and a user toggle to apply a label disclosing AIGC uploaded to the Platform (the “**Creator AIGC Label**”) (the Automated AIGC Label and the Creator AIGC Label collectively, the “**AIGC Labels**”) (see **question I.A.6** below).

14. With respect to TikTok's introduction of these first-of-their-kind AIGC Labels, in September 2023 Commissioner Breton shared on X a copy of TikTok's public announcement about this tooling, together with a statement that “*The [European Union] is the global pioneer of clear rules for trustworthy #AI. With #DSA & #AIAct, we hold Platforms & AI systems accountable by requiring disclosure of deep fakes. TikTok's announcement to enable labelling of AI-generated content is a first step*”.⁹

⁸ RFI, p. 6; Election Guidelines, paras. 3, 36.

⁹ See <https://twitter.com/thierrybreton/status/1704552345638437154?s=46&t=xTwU1NRW1Y98TE-Tp7bMA>.

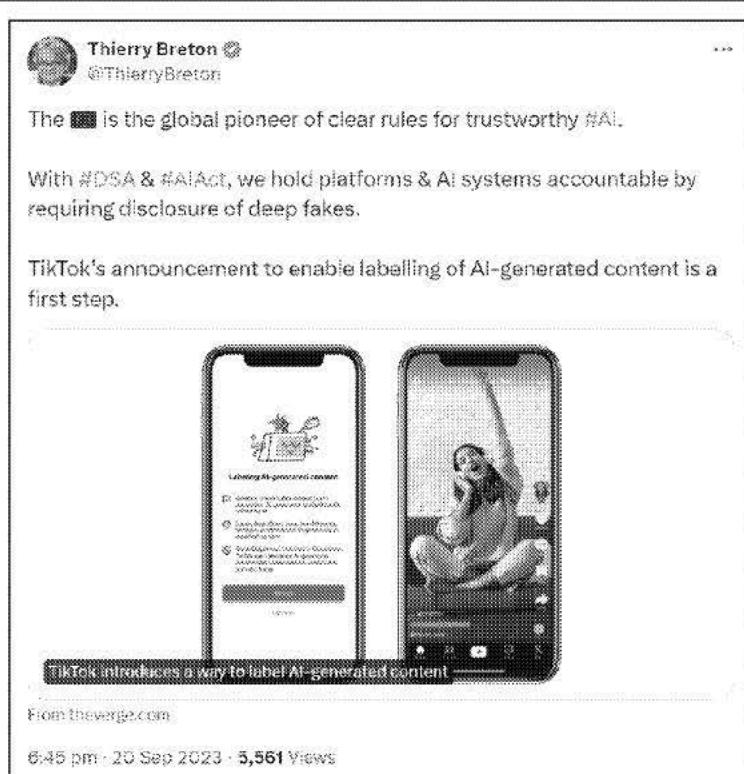


Figure 1: Tweet shared on X by Commissioner Breton

15. As TikTok hopes will be clear from its responses below to Section I of this RFI, TikTok is committed to continue being an industry leader in combating risks related to harmful and illegal AIGC.

Article 11(1) DSA single point of contact question

16. Pursuant to Article 11(1) DSA, TikTok Technology Limited ("TikTok") has designated the following email address as the single point of contact to enable communications directly, by electronic means, with Member States' authorities, the European Commission and the Board:

DSA-single-point-of-contact-authorities@TikTok.com

17. For more details on TikTok's points of contact under the DSA, please see:

<https://www.tiktok.com/transparency/en/dsa-contact-points/>

Section I – Questions and Answers

I. As regards the risk assessment and risk mitigation measures (compliance with Articles 34 and 35 of Regulation 2022/2065) in regard to risks stemming from Generative AI in relation to civic discourse and electoral processes

A. In relation to the dissemination of Generative AI content related to risks for civic discourse and electoral processes

1. Please set out in detail internal guidelines, policies, and practices related to Generative

AI content in TikTok. This includes content generated on other platforms or within TikTok's services. Additionally, please describe in detail how TikTok enforces such policies.

18. As explained in the Executive Summary of the RAR, TikTok was one of the first platforms to develop and implement systems to deal with AIGC.¹⁰ TikTok's objective in developing its user-facing policies relating to AIGC (specifically, the Community Guidelines) is to balance creative expression with the mitigation of harm, and to give creators appropriate methods to disclose their use of AI tools. This approach seeks to empower creators to explore the positive uses of AIGC, while also encouraging transparency around AIGC via self-disclosure and making clear what types and uses of AIGC are harmful.

Current policy framework

19. TikTok's Community Guidelines are at the centre of its measures to protect users and ensure that the Platform provides a safe, trustworthy and vibrant experience. The Community Guidelines set out the rules and standards that users must follow when using the Platform and, as such, they form the basis of TikTok's enforcement and content moderation processes and strategies. The Community Guidelines apply to everyone and everything on the Platform, including the dissemination of AIGC that may pose risks in relation to civic discourse and electoral processes.

20. In particular, the Community Guidelines include dedicated sections on:

- a. "*Synthetic and Manipulated Media*" (i.e., the S&MM Guidelines), which explain, in user-friendly language, that: (i) TikTok prohibits certain types of AIGC, including certain AIGC related to civic and electoral processes; and (ii) users are required to label all realistic uses of AIGC via a method of their choosing (e.g., a sticker, a caption). To make labelling easier, TikTok developed the Creator AIGC Label, a toggle for users to apply a label to their own AIGC. TikTok's AIGC Labels are discussed further in response to **question I.A.6** below.
- b. "*Civic and Election Integrity*" (the "**Civic and Election Integrity Guidelines**"), which explain, in user-friendly language: (i) that TikTok does not allow paid political promotion, political advertising or fundraising by politicians or political parties; and (ii) how TikTok enforces against misinformation regarding civic and electoral processes, regardless of intent. In the Commitments page in TikTok's Transparency Centre, in the section on "*Protecting the integrity of elections*",¹¹ TikTok explains that "*[g]uarding against potentially misleading AI-generated content*" is a key component of its efforts in this area. In addition, TikTok refers the Commission to its response to Section II of RFI (Ref.Ares(2023)7112552 – 19.10.2023) (the "**Civic Discourse & Electoral Processes RFI**").
- c. "*Misinformation*" (the "**Misinformation Guidelines**"), which explains, in user-friendly language, how TikTok enforces against inaccurate, misleading or false content that may cause significant harm to individuals or society, regardless of intent. This includes material that has been edited, spliced or combined (such as video and audio) in a way that may mislead a person about real-world events. In the Commitments page in TikTok's Transparency Centre, in the section on combating harmful misinformation,¹² TikTok explains that its efforts to maintain a safe, authentic space where people can discover content that is original and engage with people who are authentic extend to misinformation in AIGC.

¹⁰ RAR, p. 8.

¹¹ See <https://www.tiktok.com/transparency/en/protecting-elections/>

¹² See <https://www.tiktok.com/transparency/en/combatting-misinformation>.

21. In developing the S&MM Guidelines, TikTok's Product Policy and Issue Policy teams conducted research on academic, industry and advocacy literature to inform TikTok's understanding of emerging risks, which in turn informs the development of TikTok's policies. TikTok also consults with external bodies and subject matter experts, including, e.g., the Partnership on AI (the "PAI"), a non-profit organisation which gathers companies and other stakeholders affected by AI to establish common codes of practice across industry. More information on TikTok's partnerships is provided in response to **question A.2.I** below.
22. TikTok applies its S&MM Guidelines to still images, video and / or audio generated through deep- or machine-learning processes such as generative adversarial networks (GAN) or diffusion models that can generate realistic but fabricated videos, including those of real people.
23. In applying the S&MM Guidelines, TikTok only allows AIGC on the Platform when it meets all of the following criteria:
 - a. It is clearly and prominently labelled as, e.g., deepfake / synthetic media / fake / not real by the user in overlay text or in the description;¹³
 - b. The individual depicted is not a minor;
 - c. The individual depicted is completely fictional, or is the creator of the content, or is a public figure;
 - d. Of particular relevance to civic discourse and electoral processes, it does not depict a public figure doing any of the following:
 - making a commercial or political endorsement, including:
 - endorsing a product or event;
 - endorsing a political party, or a specific political platform or position; or
 - endorsing or expressing support for another public figure or the creator;
 - engaging in, or being depicted as the victim of, bullying, harassing, degrading or hateful behaviour or using hate speech; or
 - making a misleading statement related to an election or other civic process, or spreading false information during a high risk event, such as political transitions or uprisings.
 - e. It does not violate any other policy in the Community Guidelines.

Enforcement of TikTok's Community Guidelines: S&MM Guidelines, Civic and Election Integrity Guidelines, and Misinformation Guidelines

Automated detection and moderation measures

24. Videos uploaded to TikTok are initially reviewed by an automated moderation technology ("Automated Review") – in real-time given the volume of content posted to the Platform on a continuous basis – which aims to identify content that violates the Community Guidelines. These systems look at a variety of signals across content, including keywords, images, titles, descriptions and audio. Automated Review involves review of: (i) video content for harmful

¹³ More information on TikTok's AIGC Labels is provided in response to **question I.A.6** below.

material and (ii) video titles, hashtags and audio for keywords, such as keywords associated with an election.¹⁴

25. If no violation is identified, the content will be available to view on the Platform. If a potential violation is found, the automated moderation system will either pass it to TikTok's Safety teams for further review or will remove it automatically if there is a high degree of confidence that the content violates the Community Guidelines.

26. At present, TikTok's Automated Review may remove AIGC that is detected for violating the Civic and Election Integrity Guidelines, Misinformation Guidelines, or other sections of the Community Guidelines (such as, e.g., the prohibitions on hate speech, nudity, child exploitation, etc. in the Community Guidelines). The current state of the art of detecting content on the basis that it is AIGC is still nascent. TikTok continues to work across industry groups and civil society to develop and improve automated tools to detect AIGC on the Platform, including by balancing the implementation of best practice content provenance practices with compliance with relevant laws and regulations (including the General Data Protection Regulation). For example, TikTok is currently developing multiple models to assist in the detection and moderation of AIGC uploaded to the Platform, including:

- a 'visual model' to detect whether a relevant image or video was created using a generative AI model;
- an enhanced version of that visual model to detect deepfakes; and
- an 'audio model' to detect whether audio was created using a generative AI model.

27. Further, TikTok is working to develop content provenance practices through implementation of the Coalition for Content Provenance and Authenticity ("C2PA") standard in the second or third quarter of 2024.¹⁵ The C2PA standard is an open technical standard and content provenance solution that can provide information in the metadata for a piece of content about its origin and whether AIGC models were used to create or edit it. This will assist in detecting AIGC at scale when content with C2PA metadata is uploaded to the Platform.

28. Finally, TikTok is also evaluating whether any third-party AIGC detection software could appropriately and safely be used to supplement TikTok's AIGC detection efforts.

Manual detection and moderation measures

29. Because the current state of the art of detecting content on the basis that it is AIGC is still nascent, TikTok removes AIGC that violates the S&MM Guidelines based on manual human review. TikTok's capacity to effectively detect such AIGC is reinforced by the following additional detection measures:

- Requests from internal TikTok teams to action violative AIGC: For example, TikTok's dedicated Risk Analysis team is responsible for proactively identifying potential harms that are likely to manifest as user-generated content on the Platform. They do this in several ways – e.g., by conducting media sweeps for recent and emerging trends which might appear on the Platform, including AIGC;
- Requests from external partners: Including government entities and onboarded Community Partnership Channel partners, through which various EU-based (and international) NGOs can report harmful content using a dedicated email channel or web portal. In this regard, TikTok's fact-checking partners are authorised to proactively identify

¹⁴ For further information on this process in the context of elections, see Risk Assessment 2: Integrity & Misinformation, Module 1: Risk to Election and Civic Integrity, pp. 20-24.

¹⁵ See <https://c2pa.org/>.

content that may constitute harmful misinformation on the Platform and to suggest prominent misinformation that is circulating on other social media platforms or websites that may benefit from verification; and

- c. When a video reaches a certain level of popularity on the platform, or if a video increases in popularity very quickly, it is flagged for manual review. Determining the level of popularity of a video is not based on a single metric but instead takes into account a variety of factors, which may include the number of views, likes, shares and comments, etc.
- d. Targeted proactive 'sweeps' of specific types of content: For example, this may involve a targeted sweep focused on use of a specific keyword, URL, or hashtag identified as being associated with high risk content, such as certain 'viral' or popular content.

30. As discussed in TikTok's response to the Civic Discourse & Electoral Processes RFI, content related to civic discourse and electoral processes can also be flagged for manual review through measures set up under the Election Integrity Programme (the "EIP"), including 'mission control centres' established for high risk elections.¹⁶ In addition, in the election context, manual review can be triggered by, e.g., notices from fact-checking partners, or trusted flaggers and other trusted partners onboarded for the purpose of flagging election misinformation. Further, TikTok's 'High Risk Library' tool can automatically recall and moderate identical or certain near-identical copies of clearly violative content, including AIGC.

31. A recent example of this process in action involved deepfake audio of the UK politician Sir Keir Starmer. TikTok's Public Policy team became aware via a report from a third party of AIGC video content disseminating on various online platforms, and escalated the issue to TikTok's Incident Management team to conduct a sweep for any such content on the Platform. This escalation was treated as a priority because of the potential for harm when politicians are the subject of AIGC masquerading as 'leaked audio'. Accordingly, the Incident Management team conducted a sweep, identified 14 violative videos, removed all of them pursuant to the S&MM Guidelines, and added the video and audio content to TikTok's 'High Risk Library' to prevent further uploads. The time from receiving the escalation to enforcement was under 90 minutes.

Development of new AIGC policies

32. As new deceptive behaviours emerge, TikTok continues to evolve its response processes, further strengthen its enforcement capabilities and develop appropriate product and policy solutions. For example, in the coming months, with respect to AIGC, TikTok intends to introduce the following:

- a. Large scale moderation made possible by development of the models detailed in paragraph 26, which will detect and filter certain AIGC to escalate it for review by TikTok's moderators.
- b. Labelling by TikTok moderators of non-violative but un-labelled realistic AIGC after it is detected on the Platform via such models.
- c. A policy with respect to AIGC that has been detected as potentially misleading that will enable TikTok's Incident Management team to restrict ('not recommend') such content, pending further review.

TikTok would be happy to discuss these new policies with the Commission in further detail if helpful.

¹⁶ Civic Discourse & Electoral Processes RFI, *question II.A.13*.

33. In developing these updates to its policies, TikTok considered potential strategies to tackle AIGC-related risks across issue areas. For example, TikTok's Civic Integrity Policy team, Youth Safety and Wellbeing Policy team and Content Classification team contributed to the development of these new policies. TikTok also consulted with a number of external stakeholders, including a globally recognised AIGC researcher, advisor, speaker and broadcaster with particular knowledge of and experience concerning political deepfakes. TikTok will continue to work proactively to address the impact of AIGC on platform integrity, and to strengthen its internal capabilities to disrupt adversarial abuse by malign actors who seek to weaponise AI technologies.

2. Please describe any partnerships with other providers or other consortia that TikTok is a member of, related to Generative AI. Please describe the actions (e.g., meetings, technical exchanges, shared developments), outcomes (e.g., new technologies / systems, new processes), and underlying documents (e.g. meeting notes, emails/exchanges) of these partnerships and consortia and describe how they have been implemented within TikTok.

34. As part of its commitment to mitigating the risks of AIGC that qualifies as misinformation, as well as misinformation generally, TikTok is involved in a number of partnerships with other providers or consortia.

Partnership on AI

35. TikTok was the first social media platform signatory to the PAI's Responsible Practices for Synthetic Media (the "**Practices**"),¹⁷ a first-of-its kind code of industry best practices for AI transparency and responsible innovation, balancing creative expression with the risks of emerging AI technology. In accordance with its commitments as a launch partner for the Practices, TikTok worked on a case study outlining how the Practices informed TikTok's policy making on synthetic media (the "**PAI Case Study**").¹⁸ Other members of the inaugural cohort of launch partners included Adobe, BBC, CBC / Radio-Canada, Bumble, OpenAI, WITNESS and synthetic media startups Synthesia, D-ID and Respeecher.

Tech Accord to Combat Deceptive Use of AI in 2024 Elections

36. TikTok has joined industry partners as a party to the Tech Accord to Combat Deceptive Use of AI in 2024 Elections (the "**Accord**"). Via the Accord, member technology companies are considering ways to work together to safeguard communities against misleading and deceptive AI in this election year – including, with respect to AIGC, to safeguard against an increased risk of, e.g., disinformation campaigns, efforts to discredit politicians and the proliferation of fake political endorsements by celebrities. This work may include, e.g., collaboration on tools to detect and address online distribution of such AIGC, with attention to the importance of tracking the origin of deceptive election-related content and the need to raise public awareness about the problem.

C2PA

37. As noted in response to **question I.A.1** above, the C2PA standard is an open technical standard and content provenance solution that can provide information in the metadata for a piece of content about its origin and whether AIGC models were used to create or edit it. In

¹⁷ See https://partnershiponai.org/wp-content/uploads/2023/02/PAI_synthetic_media_framework.pdf.

¹⁸ See <https://partnershiponai.org/wp-content/uploads/2024/03/pai-synthetic-media-case-study-tiktok.pdf>.

addition to implementing the C2PA standard later this year, TikTok is in advanced discussions with the C2PA with the aim of working together in a wider capacity going forward.

CoPD Working Groups on Elections and Generative AI Process

38. TikTok is a signatory to the EU Code of Practice on Disinformation (the “**CoPD**”) and, since 2020, has been committed to, and heavily involved in, the CoPD’s taskforce and all of its working groups and subgroups – including serving as: (i) co-chair of the working group on elections and (ii) a member of the newly-created Generative AI working group – which facilitates information exchange and best practices among CoPD signatories on identified topics. For example, in the lead up to the EU Parliamentary elections, the working group on elections is considering ways to notify each other of content that may negatively impact civic discourse and electoral processes. Similarly, the Generative AI working group is assessing the Commission’s recently-finalised Election Guidelines in the context of AIGC risks for elections.
39. In addition, in line with CoPD Commitment 15 – which requires Relevant Signatories that develop or operate AI systems and that disseminate AI-generated and manipulated content through their services (e.g., deepfakes) to commit to take into consideration the transparency obligations and the list of manipulative practices prohibited under the proposal for the EU Artificial Intelligence Act – TikTok deployed new implementation measures, as explained in the response to **question I.A.1** above and as also detailed in TikTok’s third report under the CoPD published on 26 March 2024 (“**TikTok’s Third CoPD Report**”).¹⁹ TikTok’s work with the CoPD reflects its strong commitment to transparently combating misinformation on the Platform (and more broadly), including in AIGC.

Media literacy bodies and trusted fact-checking partners

40. As also detailed in TikTok’s Third CoPD Report, in the context of its election integrity efforts TikTok worked with local media literacy bodies and trusted fact-checking partners to run 18 campaigns during 2023, which generated more than 220 million impressions and reached approximately 50 million people on the Platform. Nine more campaigns are scheduled for 2024, and by the end of this year, TikTok communities in every one of the 27 EU Member States will have access to localised educational videos from TikTok partners and local creators about how to be vigilant against misinformation. TikTok also partners with several fact-checking partners²⁰ to help review and assess the accuracy of content across more than 60 markets.
41. Further, in partnership with the National Association for Media Literacy Education (NAMLE), TikTok’s “*Be Informed*” video series addresses media literacy and aims to strengthen the ability to access, analyse, evaluate, create and act using all forms of communication. With TikTok’s “*Be Informed*” series, the TikTok community is encouraged to think critically about both the content that they encounter online and the content that they create.
42. Additionally, TikTok has continued to work with partners to protect the integrity of the Platform, including in respect of AIGC, as a number of European countries have held national elections. For example:
 - a. Newtral, a TikTok fact-checking partner, and Maldita, a Spanish fact-checking and media literacy organisation, helped TikTok to create educational videos on media literacy and how to be source-critical, which TikTok embedded in its Spanish Elections Centre.

¹⁹

<https://sf16-va.tiktokcdn.com/obi/eden-va2/uHkklyeh70thpu/Niamh's%20directory/TikTok%20Code%20of%20Practice%20on%20Disinformation%20Report%20-%20July%20to%20December%202023.pdf>. p. 88.

²⁰

TikTok chooses partners who are signatories of the International Fact-Checking Network’s code of principles, including the AFP and Lead Stories (see <https://ifcncodeofprinciples.poynter.org/know-more/the-commitments-of-the-code-of-principles>).

- b. TikTok partnered with DigiQ to develop its media literacy strategy, and created an in-app Slovak Election Centre, which redirected users to authoritative information on DigiQ's website.
- c. Working with its new fact-checking partner Demagog and FakeNews.pl, TikTok provided its Polish community with official voting information through an in-app Polish Election Centre, including educational videos.
- d. Together with Deutsche Presse-Agentur ("DPA"), its fact-checking partner, and Nieuwscheckers, a fact-checking initiative of the Journalism and New Media Course at Leiden University, TikTok provided users with up-to-date information in its in-app Dutch Election Centre.
- e. TikTok also used its Election speaker series to promote election integrity and inform its approach to country-level EU elections. For example, TikTok invited local and regional experts to share their insights and market expertise with TikTok's internal teams, including from Newtral (for Spain), Demagog (for Poland), DPA (for the Netherlands) and DigiQ (for Slovakia).

International Foundation for Electoral Systems

- 43. Earlier this year, TikTok worked with the International Foundation for Electoral Systems (IFES) to draft a set of Voluntary Guidelines for Election Integrity for Technology Companies, with additional contributions from members from civil society, electoral authorities and industry peers. The Voluntary Guidelines were published on 19 March 2024. TikTok endorsed the Voluntary Guidelines and meets the commitments therein.
- 44. Additional information regarding TikTok's partnerships that generally relate to disinformation is detailed in TikTok's Third CoPD Report.²¹

3. Please describe in detail the risk assessment concerning and any mitigation measure taken to detect Generative AI content on the service, especially with regard to synthetic or manipulated images, audio or videos that appreciably resemble existing persons, objects, places, entities, events, or depict events as real that did not happen or misrepresent them (i.e., deepfakes). In doing so, please devote special attention to content concerning politicians, candidates, political parties, false depiction of events, election polls, information on how, where and when to vote, contexts or narratives, or any other relevant situation for the electoral political context.

- 45. As explained in the Introduction section above, TikTok's Year 1 RA process did not classify AIGC as a stand-alone systemic risk in and of itself; rather, TikTok assessed AIGC within the context of that process through AIGC's potential harmful impact on, or manifestation in, the Systemic Risk Categories (and related Risk Areas / Modules) that TikTok identified. TikTok's classification of AIGC as an emerging risk in its Year 1 RA process meant that AIGC's impacts on the Systemic Risk Categories addressed in its Year 1 RAR were considered and assessed as part of that process. Specific detail of how AIGC featured in TikTok's Year 1 RA process is provided in paragraphs 4-12 above.

²¹

<https://sf16-va.tiktokcrn.com/obj/eden-va2/u/hkklyeh70thpu/Niamh's%20directory/TikTok%20Code%20of%20Practice%20on%20Disinformation%20Report%20-%20July%20to%20December%202023.pdf>, p. 135.

46. As also explained in the Introduction, although TikTok did not classify AIGC as a stand-alone systemic risk in and of itself, TikTok has implemented a variety of robust AIGC-related mitigation measures which impact on the systemic risks addressed in the RAR and which TikTok continues to expand. These include: (i) the adoption and enforcement of the S&MM Guidelines (see further the response to **question I.A.1** above); (ii) the development of the forthcoming policies related to AIGC referred to in paragraph 32 above; and (iii) introduction of the AIGC Labels, an industry first set of groundbreaking tooling for the labelling of AIGC (see further the response to **question I.A.6** above).
47. To assess and mitigate risk, TikTok consults with subject-matter experts in developing its policies and products, including in relation to AIGC. For example, in developing the S&MM Guidelines, TikTok consulted with the PAI; an award-winning human rights advocate, technologist and innovative leader from WITNESS, with over a quarter of a century of experience at the intersection of video, technology, civic participation and media practices; and a globally recognised AIGC researcher, advisor, speaker and broadcaster, working at the frontier of AIGC. In developing the forthcoming policies referred to in paragraph 32 above, TikTok consulted with representatives from the Roundtable of GenAI and AIGC experts put together by Ethical Resolve, as well as representatives from several academic institutions.
48. In addition, prior to launching TikTok's AIGC Labels, TikTok consulted with Dr. David G. Rand – the Erwin H. Schell Professor and Professor of Management Science and Brain and Cognitive Sciences at the Massachusetts Institute of Technology ("MIT"), the director of the Applied Cooperation Initiative, and an affiliate of the MIT Institute of Data, Systems and Society and the Initiative on the Digital Economy. TikTok also consulted, as part of this process, with its eight regional Safety Advisory Councils, including its European Safety Advisory Council, which bring together a diverse array of independent experts from academia and civil society.²² Advisory Council members provide subject matter expertise and advice on issues relating to user safety, content policy and emerging issues that affect TikTok and its community.

4. TikTok's risk assessment report²³ states that "*TikTok does allow synthetic media of public figures as long as the content is not used for an endorsement or is otherwise violative*". Please describe in detail how TikTok assessed the risk of this policy, and how TikTok defines and detects "*public figures*", "*endorsement*", and "*otherwise violative*". Please describe in detail systems, and provide internal documentation of performance metrics, experiments and tests, qualitative and quantitative results (including on accuracy, precision or other relevant metrics), internal processes, internal controls, and other input to detect these.

How TikTok assessed risk in developing the S&MM Guidelines

49. As explained in the Introduction section above, TikTok's Year 1 RA process did not classify AIGC as a stand-alone systemic risk in and of itself. Further, the S&MM Guidelines were introduced in April 2023, before the DSA's date of application. Accordingly, TikTok's response to this question does not concern the assessment of risk in that context.
50. When the S&MM Guidelines were developed, one significant challenge for the industry (as explained in the PAI Case Study) was anticipating the potential harms presented by AI tools, as well as the positive non-harmful potential uses of such tools. To address this challenge, TikTok's Integrity & Authenticity Policy team developed the first iteration of the S&MM

²² For further information regarding the Safety Advisory Councils and their members, see <https://www.tiktok.com/transparency/en-us/advisory-councils>.

²³ Page 35.

Guidelines in the autumn of 2022 (materially before the DSA's date of application), primarily in an anticipatory fashion. At the time, there was an emerging awareness of synthetic media creation tools, but they were not widely available and AIGC had not yet appeared in high volumes on online platforms. TikTok already prohibited material that was edited in a way that might mislead users about real world events, but considered that there was further potential for harm if the TikTok community did not have clear policy guidance for creators and users regarding acceptable use of AIGC. Accordingly, TikTok sought to develop a policy that would empower creators to explore the creative potential of AI transparently, while also protecting against the risk of misleading viewers if they were unaware that content was edited or created with AIGC.

51. TikTok opted for the approach explained in response to **question I.A.1** above, which limits the ability of AIGC to mislead users about important real world events, or misinform users about the views of public figures when this may have an impact on their own decision-making in political or commercial contexts, while also maintaining access to AIGC as an important tool for creativity. Further, TikTok mitigates the potential risk of harm caused by AIGC that is permitted under the policy by requiring such AIGC to be clearly labelled, as explained in response to **question I.A.6** below.
52. In developing these guidelines, TikTok engaged with experts, including members of its Safety Advisory Committee, WITNESS, and MIT's Dr. Rand.²⁴ In addition, TikTok's policies are informed by its engagement with civil society partnerships, as explained in response to **question I.A.2** above, and TikTok's Public Policy teams conduct wide ranging literature reviews to assess the potential risk of AIGC, which consider both non-harmful and harmful uses of AIGC.

Meaning of "public figures", "endorsement" and "otherwise violative" in TikTok's S&MM Guidelines

53. As set out in the S&MM Guidelines, TikTok does not allow AIGC of public figures if it is used for endorsements or violates any other policy. In applying the S&MM Guidelines, TikTok:
 - a. defines **public figures** as adult individuals, such as a celebrity, business leader, government official or politician who has acquired fame and / or notoriety for their contribution to society. TikTok creators and internet platform figures who have acquired fame only due to their presence on internet platforms are not defined as public figures. Similarly, minors are not included within this definition, since the S&MM Guidelines prohibit all AIGC that contains the likeness (visual or audio) of a person who is 17 years old or younger.
 - b. prohibits, as explained in response to **question I.A.1** above, depictions of public figures making **commercial or public endorsements** (i.e., demonstrating support for something), including:
 - endorsing a product or event;
 - endorsing a political party, or a specific political platform or position; or
 - endorsing or expressing support for another public figure or the creator.
 - c. considers **otherwise violative** to refer to a contravention of any of TikTok's other Community Guidelines (such as, e.g., the prohibition on hate speech, nudity, child exploitation, etc. in the Community Guidelines).

²⁴ As set out in response to **question I.A.1** above.

54. Finally, as explained in response to **question I.A.1** above, as new deceptive behaviours emerge, TikTok continues to evolve its product and policy solutions, and in the coming months intends to introduce new policies relating to AIGC (as explained in paragraph 32 above). In applying these new policies, TikTok will update its definition of "endorsement" to make clear that this includes physical demonstrations of support – defining it as: saying or physically demonstrating through, e.g., a hug, an arm around a shoulder, or handshake, support for something – and will continue to prohibit the commercial or political endorsements set out above.

Detection of AIGC that may violate the S&MM Guidelines

55. Please see **question I.A.1** above regarding the automated and manual processes currently used (and in development) to detect and moderate AIGC on the Platform. In addition, please see: (i) **question I.A.5** below regarding content moderation actions on AIGC content; and (ii) **question I.A.6** below regarding details of the AIGC Labels.

5. Please describe in detail the risk assessment concerning and the content moderation actions taken on Generative AI content, detected within the service, including removals, demotions, etc. by Member State or EU language and at the EU level. In doing so, please devote special attention to content concerning politicians, candidates, political parties, false depiction of events, election polls, information on how, where and when to vote, contexts or narratives, or any other relevant situation for the electoral political context.

56. As explained in the Introduction section above, TikTok's Year 1 RA process did not classify AIGC as a stand-alone systemic risk in and of itself. With respect to the detection and moderation of AIGC generally, TikTok refers the Commission to its response to **question I.A.1** above, as well as TikTok's response to **question B.c.22** in the Civic Discourse & Electoral Processes RFI regarding the performance metrics and internal controls that TikTok uses to detect infringements of the S&MM Guidelines.

57. With respect to content moderation actions taken under the S&MM Guidelines:

a. Number of videos removed in the EU under the S&MM Guidelines from 1 July to 31 December 2023:

Table 1

Country	# of videos
Austria	59
Belgium	88
Bulgaria	27
Croatia	229
Cyprus	214
Czech Republic	37
Denmark	65
Estonia	3
Finland	43

France	603
Germany	436
Greece	170
Hungary	17
Ireland	11
Italy	110
Latvia	9
Lithuania	10
Luxembourg	22
Malta	0
Netherlands	120
Poland	143
Portugal	16
Romania	67
Slovakia	45
Slovenia	0
Spain	176
Sweden	105
EU Level	2,825

58. With respect to content moderation actions concerning politicians, political parties or elections content, the best available data is included in TikTok's Third CoPD Report in relation to Commitment 18,²⁵ which data is reproduced below for convenience:

a. Number of videos removed in the EU under the Civic and Election Integrity policy from 1 July to 31 December 2023 (note: this data is agnostic as to whether the content was AIGC):

Table 2

Country	# of videos
Austria	233
Belgium	213
Bulgaria	188
Croatia	24
Cyprus	143
Czech Republic	1,648
Denmark	133

²⁵ TikTok's Third CoPD Report also includes other metrics related to Commitment 18 on minimising the risks of viral propagation of disinformation by adopting safe design practices in systems, policies and features (for example, the number of videos removed for violation of the Misinformation policy or the number of views of videos removed because of violation of the Civic and Election Integrity policy). TikTok reproduced the data here that best relates to this question.

Estonia	26
Finland	1,104
France	1,225
Germany	744
Greece	651
Hungary	233
Ireland	123
Italy	2,571
Latvia	53
Lithuania	37
Luxembourg	11
Malta	12
Netherlands	912
Poland	874
Portugal	357
Romania	584
Slovakia	71
Slovenia	5
Spain	1,411
Sweden	230
EU Level	13,816

b. Number of videos made ineligible for the For You Feed in the EU under relevant Integrity and Authenticity policies (general conspiracy theories and unverified information related to an emergency or unfolding event) from 1 July to 31 December 2023 (note: this data is agnostic as to whether the content was AIGC):

Table 3

Country	# of videos
Austria	578
Belgium	12
Bulgaria	153
Croatia	24
Cyprus	2
Czech Republic	192
Denmark	93
Estonia	28
Finland	103
France	23,834

Germany	13,070
Greece	594
Hungary	191
Ireland	20
Italy	6,252
Latvia	0
Lithuania	5
Luxembourg	0
Malta	7
Netherlands	2,506
Poland	3,997
Portugal	162
Romania	2,774
Slovakia	69
Slovenia	14
Spain	25,272
Sweden	3,007
EU Level	82,959

6. Please describe in detail the actions taken on Generative AI content, detected within the service, including labelling, watermarking, etc., additionally clarifying whether TikTok provides users with interfaces and tools to add labels to Generative AI content and whether such labels are retained once the content is shared by other users on the platform or when uploaded on the platform.

59. TikTok has a number of approaches to detecting, labelling and moderating AIGC on the Platform.

Labelling of AIGC

60. TikTok supports labelling of AIGC to enable transparent and responsible content creation practices. TikTok's AIGC Labels have been in place since September 2023, and TikTok's S&MM Guidelines require that AIGC showing realistic scenes must be clearly disclosed / labelled. TikTok offers robust labelling options for users to ensure that AIGC is labelled where required.

TikTok's automatic labelling of AIGC created on TikTok

61. Moreover, where content on the Platform uses certain AIGC features provided by TikTok (such as a TikTok AI effect), TikTok automatically applies the Automated AIGC Label to the relevant piece of content visible on the Platform, which clearly identifies to viewers that the content is

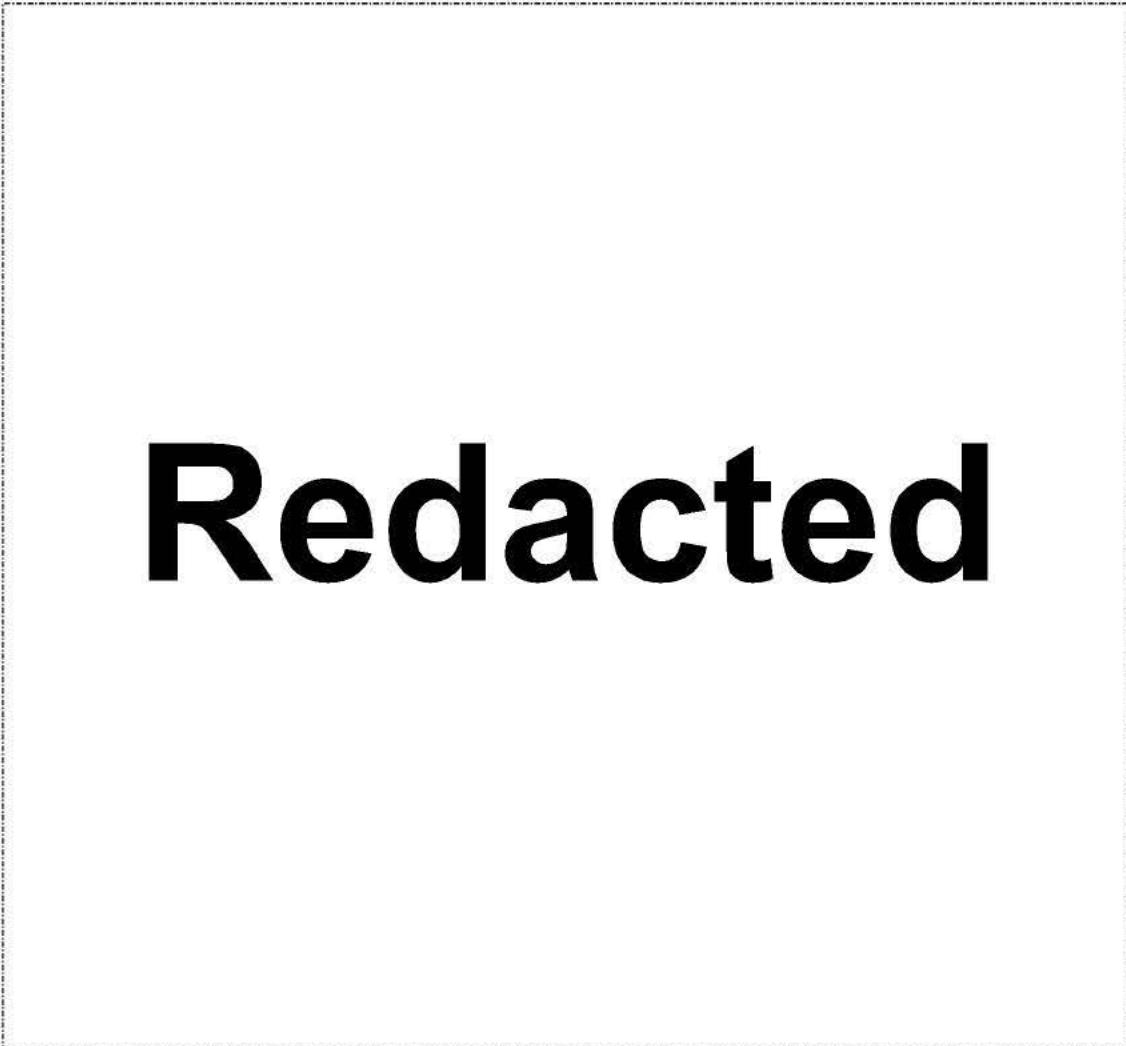
“AI-generated” (see Figure 2 for an example). Once applied, the Automated AIGC Label is retained in the metadata of that piece of content.

Redacted

62. In addition to the Automated AIGC Label, TikTok also automatically applies labels for all visual effects used on TikTok, even if they were not created using generative AI models (the “**Effects Label**”). The Effects Label allows viewers to easily identify: (i) that the content being viewed has been edited by an effect; and (ii) what that effect is (e.g., a greenscreen effect). The Effect Label is automatically applied for all visual effects used on TikTok, including any effects that use AIGC.
63. In addition, TikTok’s labelling guidelines for the creators of effects explain that any filters or effects that result in content completely generated or significantly edited by generative AI models must be appropriately disclosed, such as by the inclusion of “AI” in the name of the effect. This assists TikTok’s users to identify specific visual effects on the Platform that use AIGC. Even if “AI” is not included within the effect name, the Effects Label ensures that viewers can clearly identify that the content has been manipulated by a visual effect or filter.

Labelling tools provided to users to enable them to manually label AIGC

64. TikTok provides options for users to easily meet the mandatory labelling requirements under the S&MM Guidelines when they share videos on the Platform by giving them the ability to add text, apply a hashtag sticker, or include context in the video's description (such as stating that the video is "synthetic", "fake", or "altered").
65. For example, in September 2023, TikTok introduced the option for users to meet the labelling requirements by adding the Creator AIGC Label to the relevant piece of content. This clearly identifies to viewers that the content is "*Creator labeled as AI-generated*" (see Figure 3 for an example). Other than the phrase used, the Creator AIGC Label is visually identical to the Automated AIGC Label discussed in paragraph 61 above. In addition, TikTok provides: (i) an easy-to-use interface for users to apply the Creator AIGC Label (see Figure 3); and (ii) detailed guidance to help users understand what AIGC is (and what types of AIGC are prohibited on the Platform entirely), what TikTok's labelling requirements for AIGC are, and how to apply the Creator AIGC Label.²⁶ While TikTok encourages users to label all AIGC, it will only remove unlabeled realistic AIGC under the Community Guidelines.



Redacted

Figure 3: Screenshot of "*Creator labeled as AI-generated*" label and related interface

²⁶ See <https://support.tiktok.com/en/using-tiktok/creating-videos/ai-generated-content#6>.

66. In developing the AIGC Labels, TikTok consulted with its eight regional Safety Advisory Councils, including its European Safety Advisory Council (see further the response to **question I.A.2** above). It also consulted with industry experts including MIT's Dr. Rand, who studies how viewers perceive different types of AI labels and whose research helped to guide the design of TikTok's AIGC Labels. The AIGC Labels were well received, including by Commissioner Breton (as discussed in paragraph 14 above).
67. The AIGC Labels and the Effects Label are retained when the content is shared by other TikTok users on the Platform.
68. Notably, the AIGC Labels are consistent with the Commission's Election Guidelines, finalised in March 2024, which recommend that VLOP providers: (i) adopt clear labelling practices (to the extent technically feasible according to the current state of the art technology); (ii) provide users of their services with easy-to-use interfaces and tools to add labels to AIGC; and (iii) utilise labels that are effective and easily recognisable; and (iv) ensure that AIGC labelling is retained when the AIGC is shared by other users on the platform.

Content Moderation Actions

69. Please see the responses to **questions I.A.1 and I.A.5** above regarding TikTok's policies and approach to content moderation of AIGC on the Platform.

7. Please describe in detail any crisis response protocols, policies, or procedures put in place to address risks that may arise from the fast and viral dissemination of Generative AI content (e.g., non-watermarked deepfake content virally spreading through the service in the EU within a short timeframe). Please describe the processes in place to detect and address such high-impact risks, including the criteria used to activate responses, the response mechanisms, de- escalation procedures, the organisational set-up of response teams, and specific events where these processes were triggered in during the reporting period, along with the respective responses.

70. TikTok understands this question to relate to its compliance with Articles 34 and 35 DSA, not Article 48 DSA.²⁷ Accordingly, TikTok's response to this question does not concern crisis protocols in that context.
71. Further, because AIGC as a technology is agnostic to how it is used (indeed, it is often used to produce creative and innovative content), TikTok does not consider the fast and viral dissemination of AIGC to be a 'crisis' in and of itself. However, as explained in the Executive Summary of the Year 1 RAR, AIGC "*makes it increasingly easy to create realistic images, video, and audio that can make it more difficult to distinguish between fact and fiction and the creation of illegal content, or can be used as part of image-based abuse*". Therefore, the fast and viral dissemination of particularly harmful or illegal AIGC could in certain circumstances contribute to a 'crisis'.
72. TikTok has a variety of mechanisms available to mitigate the risk of viral dissemination of illegal or abusive content in relation to civic discourse and electoral processes, depending on the severity of the risk:

²⁷ TikTok also notes that this question refers to "crisis response protocols". The DSA makes clear that crisis protocols "shall be strictly limited to extraordinary circumstances affecting public security or public health".

a. **Standard processes:** TikTok applies a variety of proactive safety reviews to identify violative content. As explained in paragraph 24 above, an Automated Review process occurs in real-time when videos are uploaded to the Platform which aims to identify content that violates TikTok's Community Guidelines. In addition, when a video reaches a certain level of popularity on the Platform, it is flagged for manual review. For further information, please see TikTok's response to **question 1** (paragraph 31) and **question 7.i** of Section I of RFI (Ref.Ares(2023)7112552 - 19.10.2023) (the "**Israel / Hamas RFI**").²⁸

b. **General electoral process:** As explained in TikTok's response to the Civic Discourse & Electoral Processes RFI, TikTok has in place (since before the DSA's date of application) a broad EIP targeted at identifying risks associated with election misinformation and ensuring the integrity of information on the Platform as it relates to elections and electoral processes. As part of this EIP, TikTok assesses the risks posed by upcoming elections in the EU based on certain factors such as: (i) political stability; (ii) candidate safety; (iii) election significance; (iv) election interference record; (v) relevant legal landscape; and (vi) relevant market and TikTok factors (e.g., user numbers). Having assessed these risks, TikTok then determines which measures are appropriate to adopt in response to the risks identified. The mitigation measures in the EIP would apply to the viral dissemination of AIGC in the context of an election before the dissemination of AIGC would even qualify as a 'crisis'.

For further information on how TikTok identifies risks during elections and what measures it may implement to respond to identified risks (e.g., reporting mechanisms, fact-checking programmes, mission control centre, etc.), please see TikTok's responses to **questions A.13, B.d.25.i, B.d.25.ii, and B.d.25.iii** of the Civic Discourse & Electoral Processes RFI.

c. **Incident Management:** As set out in TikTok's responses to the Israel / Hamas RFI and the Civic Discourse & Electoral Processes RFI, TikTok maintains a dedicated Incident Management team (within TikTok's Trust & Safety team) to address urgent issues and contain / minimise harm. The Incident Management team operates a comprehensive crisis management plan setting out a series of recommended standard operating procedures in relation to certain high-priority escalations, including concerning viral election content, referred to as the "*P0 Incident Escalations Protocol*":

- The P0 Incident Escalations Protocol recommends the management of certain high-priority escalations in six separate phases:
 - Phase 1: Assess, categorise and create an escalation;
 - Phase 2: Contain the escalation;
 - Phase 3: Deliver remedying actions and solutions;
 - Phase 4: De-escalate and close the escalation;
 - Phase 5: Handover to business-as-usual moderation and monitoring; and
 - Phase 6: Conduct post-mortem analysis and building of permanent-corrective / preventative actions and solutions.
- Once Phase 1 of the Protocol is complete, TikTok applies a range of mitigation measures to contain the escalation, primarily via Platform-wide sweeps to identify and remove identical or near-identical copies of violative content. As part of this response, TikTok considers whether any remedying actions are required to avoid similar content resurfacing on the Platform. This can include, e.g.: (i) developing

²⁸

<https://www.tiktok.com/creators/creator-portal/en-us/how-tiktok-works/understanding-our-moderation-and-appeals-process/>.

- new automated rules for the removal of violative content; (ii) identifying possible product improvements; and (iii) providing policy guidance to moderation teams.
- Throughout Phases 2 and 3 of the Protocol, the Incident Management team continues to monitor the escalation and ensures that appropriate moderation measures are in place to remove violative content. Once the escalation has been contained, the Incident Management team commences the de-escalation process and closes the escalation. Following de-escalation, ongoing moderation and monitoring of the issue moves to TikTok's Trust & Safety Operations team. Where appropriate, the Incident Management team conducts post-mortem analysis and collaborates on the development of additional mitigation measures for prevention or containment.
- Please see paragraph 31 above for an example of the P0 Incident Escalations Protocol being triggered in an election context with respect to AIGC content.

Exhibit 10

Summary of meeting with European Commission Vice-President Vera Jourova - 28th May 2024 (LA office)

Notes:

- The conversation was wide ranging and the discussion points have been gathered under topic headings.
- Following the meeting, the delegation made a short visit to the LA Transparency Centre.
- Full briefing document for the meeting is available here.
- Commission tweet:
<https://x.com/verajourova/status/1795885609283702851?s=46>

Meeting Summary

1. Welcome and opening remarks were provided by Shou, who then stayed online for the duration of the hour-long meeting. The VP and her team later expressed their gratitude for this.
2. The VP opened on the topic of **election integrity**, noting that *this is the topic now* "in view of the EU elections. We are in an information war with Russia as they are focused on influencing voters and securing a win in Ukraine.
- The VP thanked TikTok for increasing its resources and for **engagement under the EU Code of Practice on Disinformation** (COPD). It was later noted that we are *one of the better players* as regards the COPD, our initiatives and the level of detail provided at national level. Fact-checking coverage could be expanded but in general, things are going well. Later in the discussion, the general proliferation of disinformation in the context of Ukraine, Israel, New Caledonia and the Olympics was commented on by the VP.
- Similarly, TikTok's good **performance under the EU Code of Conduct on Hate Speech** was noted. We were encouraged to support the conversion of both the COPD and the Hate Speech Code into DSA Codes of Conduct.
 - Redacted thanked the VP and her team for positive feedback on the COPD, noting that it was a large XF Neffort internally and a key focus. She indicated TikTok's support for the upcoming conversion process for both Codes. TikTok had signed both Codes early on in its life, in 2020, reflecting the priority given to disinformation and hate speech by the company.
- The VP commended TikTok for signing up to the **Munich Tech Accord** since AI and manipulative techniques during election periods are a matter of concern.
- The VP went on to describe how she had travelled to most Member States in the last two months as part of her '**Democracy Tour**' and that many things had been discussed in these meetings, including co-operation with TikTok. The **messages** she had received were that,

The VP indicated that she/ her team wi...

Redacted
acte
Redacted
Have followed up with the VP's Cabinet member who was in the meeting - nothing has been drafted yet but our input is welcome. Meeting now scheduled in Brussels week of 10 June to discuss this is, also in the context of the

- There should be more done in smaller Member States and languages;
- There is a question over whether there is sufficient cooperation between Member State authorities and platforms
- The VP indicated that her team will be sending a **targeted questionnaire to platforms following the EU elections** to assess "how the campaign went" and what had worked/ what had not, in order to prepare for "next actions".

» Adam described TikTok's holistic efforts on elections, including moderator coverage in all EU languages and the fact that a media literacy campaign will have been launched in all EU Member States by the time of the EU elections. He outlined our recent C/O announcement and state media labelling initiatives, and noted that our policies and practices on hate speech are ever evolving to address latest trends.

3. Turning to **minor safety**, the VP briefly referenced our DSA investigations into minor safety issues, noting that she was not into the details but was rather following "the narrative".
- In reflecting on her two terms as a Commissioner, she noted that the previous term (2014-2019) was focused on privacy with the evolution of the GDPR, whereas the current term (2019-2024) had been focused on safety and security (DSA etc). **The VP anticipates that the next 5 years will be focused on mental health, including that of minors, and that "this will be in the heads of the enforcers".**
- The VP wanted to understand how/if TikTok is inspiring the younger generation to "go out and play football and fall in love". She noted that **a very high% of young people are only getting their information from TikTok**. The platform is having a "formative impact" on young people, an issue that had come to attention as she travelled from Member State to Member State. As such, she is concerned.
- The VP made a passing remark on the **age demographic of TikTok** as being "15-20 year olds".

» Redacted described how TikTok had designed a very different teen experience, and reflected on her personal experience as a parent and that of staff in the company who were also parents and grappling with some of the societal issues that the VP had raised. She outlined TikTok's initiatives on screen time limits, development and roll out of the STEM Feed, and actions taken to suspend suspected underage accounts. Overall, the approach was one of protecting, empowering (both the teen and the parent), and learning.

Adam and Redacted clarified that the platform had aged up significantly, referring to Shou's recent public data point on the average age of a US TikTok user. Europe was similarly positioned in terms of demographics although no public data point to share just yet.

4. On the topic of **co-operation with the media**, the VP referenced recent adoption of the European Media Freedom Act and the fact that "there is a lot of work to implement". She referred to platform questions/concerns that had been raised in the course of the legislative debate about giving the media sector special treatment and asked if TikTok wanted to share any views on the topic.

» Shou outlined how TikTok does work with news agencies that are trustworthy and we often promote authoritative content. He provided the example of the the

election reports already due per the EC's election guidelines plus the COPD.

Suspect this initiative may be FIMI focused, and preparations are being laid for Von der Leyen's proposed European Democracy Shield in the next mandate.

Expand

he VP anticipates that the next 5 years...

Redacted
acted This reflects the general signals we are seeing in Brussels - ie, a next mandate focus on minor safety, addiction, and well-being.

referring to Shou's recent public data p...

Redacted
acted Personal what was the data point that was shared?

Redacted
acted Average age of the TikTok user in the US is over 30.

no public data point to share just yet

Redacted
acted We need to be able to share a concrete data point for Europe - WIP.

Redacted
acted Redacted - Redact & Redacted - note this request.

recent Taiwanese elections, during which users had been directed to authoritative content.

- The VP raised her recently adopted **Political Ads Regulation**, and noted that TikTok does not permit political advertising on its platform. Nevertheless, she still sees some issues and went on to describe how some "fringe parties", including in her country (CZ), are placing "incredible videos" on TikTok which are of great concerns.

» *Shou noted that TikTok has been reviewing the text/definitions in the Political Ads Regulation and acknowledged the VP's comments on our restrictions around political ads. He drew a distinction between ads and then organic content through which opinions on current affairs may be expressed. Freedom of expression and consistency in moderation is key and there is always a balance to be struck between freedom of expression and putting in place the appropriate guardrails. It is a difficult area, however organic content is always subject to TikTok's Community Guidelines. And there are restrictions applied to GPPPA accounts, including political advertising.*

5. The VP noted that the European Commission was now in a transition phase with the EU elections but she outlined **her focus for the remaining months**:

- Asking ourselves whether we are really filling the online space with positive information and ensuring the resilience of society
- Implementation of the DSA and the Codes
- Ensuring that the media sector is supported in Member States (more professionals, better paid)
- Engagement with civil society, fact checkers and researchers
- Ensuring that the languages in each Member State are respected/ supported
- Law enforcement related to hate speech and its ability to evolve into real world violence
- Consolidate actions on foreign interference

6. **Cybersecurity** was raised in a general sense by the VP.

» *Shou acknowledged the concerns around cybersecurity given that the business had been founded in China. He outlined the main pillars of Project Clover and Texas and a technical meeting was offered to the VP's team. Shou noted that particularly in Europe, there had been positive recognition by regulators regarding our efforts to secure European user data. The FR and DE Heads of State are now on the platform. In the US, some politicians will not even open up to a conversation, however, both US political parties are now present on TikTok.*

7. The VP briefly referred to the **Irish DPA investigations** and enquired about progress.

» **Redact** noted that the investigation on minor safety had been closed last year, and that the second /DPC investigation on transfers of data to China was still open. TikTok is cooperating with the regulator.

Exhibit 11

Subscription Document for TikTok

Contents

- II. Scrutiny of Ad Placements
- III. Political Advertising
- IV. Integrity of Services
- V. Empowering Users
- VI. Empowering the Research Community
- VII. Empowering the Fact-Checking Community
- VIII. Transparency Centre
- IX. Permanent Task-force
- X. Monitoring of the Code

Subscription Document

Name of the Signatory

TikTok

About the Signatory

TikTok is an entertainment platform, enabling its users to view, interact and share content. It is committed to promoting a safe and welcoming environment that enables everyone to express their creativity, discover, create and share content they love as well as connect with diverse communities. For EU users, the TikTok services are provided by TikTok Technology Limited, a company registered in the Republic of Ireland with its registered office at 1 The Sorting Office, Ropemaker Place, Dublin 2, D02 HD23, Ireland and company number 635755.

TikTok welcomes all content as long as it respects the [Community Guidelines](#) ("Community Guidelines") and Terms of Service. The Community Guidelines define a set of norms and common code of conduct for TikTok; they provide guidance on what is and is not allowed to make a safe and welcoming space for everyone. They apply to all users and content on the platform. TikTok regularly updates its Community Guidelines.

As set out in the Community Guidelines, misinformation that may cause significant harm to individuals or society, regardless of intent, is not permitted on TikTok. While TikTok encourages its community to have respectful conversations about subjects that matter to them, it does not permit misinformation that causes harm to individuals, its community, or the public at large. TikTok will remove any content that violates our Community Guidelines; proactively enforcing its Community Guidelines using a mix of technology and human moderation before content gets reported. In the event that content is not caught by moderation processes, users can report content for breaching the Community Guidelines.

TikTok does not allow activities that may undermine the integrity and authenticity of the platform and as such will remove content or accounts that involve spam or fake engagement, impersonation, or misleading information that causes harm.

Whilst sharing political beliefs and engaging in political conversation is allowed as organic content on TikTok, our policies prohibit our community, including politicians and political party accounts from placing paid political ads or posting political branded content. We aim to strike a balance between enabling people to discuss the issues that are relevant to their lives while also protecting the creative, entertaining and safe platform that our community wants. We are continuing to focus on enforcement of our political advertising prohibitions in light of Regulation EU 2024/900 on the Transparency and Targeting of Political Advertising coming into force and the majority of provisions applying from October 2025.

Service name	Description of the service
TikTok	TikTok allows users to create, share and watch short-form videos and live content, primarily for entertainment purposes. The Commitments and Measures below are subscribed to with reference to the products and features included in the TikTok service at the time of subscription.

Disclaimer:

- Signing up to the Commitments and Measures as set out in this document is without prejudice to the VLOP designation of the relevant services.
- Signing up does not constitute that all Services provided by a Signatory, which may be categorized as VLOPs under DSA, are in scope of the Code.

II. Scrutiny of Ad Placements			
<u>List of commitments and measures</u>	<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]	
<u>Commitment 1</u> Relevant Signatories participating in ad placement, commit to defund the dissemination of disinformation and misinformation, and improve the policies and systems, which determine the eligibility of content to be monetised, the controls for monetisation and ad placement, and the data to report on the accuracy and effectiveness of controls and services around ad placements.	<u>Measure 1.1</u>	No	TikTok remains fully committed to keeping its platform free from harmful misinformation and continues to work on defunding its dissemination. As outlined in previous reports TikTok continues to review and update its policies where necessary. TikTok has subscribed to the majority of Measures in Chapter 2 and aims to subscribe to this Measure when practicable to do so.
	<u>Measure 1.2</u>	No	TikTok has historically not allowed ad revenue sharing for creators in the EEA. As TikTok expands monetisation opportunities for creators it is working on collecting the data for SLI 1.2.1. TikTok has subscribed to the majority of Measures in Chapter 2 and aims to subscribe to this Measure when practicable to do so.
	<u>Measure 1.3</u>	Yes	
	<u>Measure 1.4</u>	No	This Measure is not relevant, pertinent or

		practicable to TikTok because it does not buy advertising on behalf of others, including advertisers and agencies.
	<u>Measure 1.5</u>	No TikTok grants access to TAG to perform brand safety certification and is able to link to its TAG Brand Safety Certification in QRE 1.5.1 of its reports. However, TikTok understands that neither TAG or MRC currently offer a disinformation audit (i.e. the audit process does not review enforcement of disinformation policies). Therefore this Measure is not pertinent or practicable.
	<u>Measure 1.6</u>	No This Measure is not relevant, pertinent or practicable because the majority of the QREs and the SLI relate to services which are not TikTok's primary business, such as rating services. TikTok will report on its in-house brand safety tool under Measure 1.3.
Reasons for <i>not</i> subscribing to Commitment 1 (if applicable):		
<u>Commitment 2</u>	<u>Measure 2.1</u>	Yes
	<u>Measure 2.2</u>	Yes

Relevant Signatories participating in advertising commit to prevent the misuse of advertising systems to disseminate misinformation or disinformation in the form of advertising messages.	<u>Measure 2.3</u>	Yes	
	<u>Measure 2.4</u>	Yes	
Reasons for <i>not subscribing</i> to Commitment 2 (if applicable):			
Commitment 3 Relevant Signatories involved in buying, selling and placing digital advertising commit to exchange best practices and strengthen cooperation with relevant players, expanding to organisations active in the online monetisation value chain, such as online e-payment services, e-commerce platforms and relevant crowd-funding/donation systems, with the aim to increase the effectiveness of scrutiny of ad placements on their own services.	<u>Measure 3.1</u>	Yes	
	<u>Measure 3.2</u>	Yes	
	<u>Measure 3.3</u>	Yes	
Reasons for <i>not subscribing</i> to Commitment 3 (if applicable):			
Information on future considerations or plans [Optional]: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i>			

III. Political Advertising			
<u>List of adopted commitments and measures</u>		<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: • <u>Reason for not subscribing (at the service level)</u> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]
<u>Commitment 4</u> Relevant Signatories commit to adopt a common definition of "political and issue advertising".	<u>Measure 4.1</u>	No	Commitment not subscribed (see below)
	<u>Measure 4.2</u>	No	
Reasons for not subscribing to Commitment 4 (if applicable): TikTok prohibits political advertising so Chapter 3 is not relevant, pertinent or practicable as it is mainly targeted towards platforms that allow such advertising. However, TikTok will endeavour to continue to provide the political advertising enforcement metrics that it has provided previously within Chapter 2 of its reports in order to be transparent.			
<u>Commitment 5</u> Relevant Signatories commit to apply a consistent approach across political and issue advertising on their services and to clearly indicate in their advertising policies the extent to which such advertising is permitted or prohibited on their services	<u>Measure 5.1</u>	No	Commitment not subscribed (see below)
Reasons for not subscribing to Commitment 5 (if applicable):			

TikTok prohibits political advertising so Chapter 3 is not relevant, pertinent or practicable as it is mainly targeted towards platforms that allow such advertising. However, TikTok will endeavour to continue to provide the political advertising enforcement metrics that it has provided previously within Chapter 2 of its reports in order to be transparent.

<u>Commitment 6</u> Relevant Signatories commit to make political or issue ads clearly labelled and distinguishable as paid-for content in a way that allows users to understand that the content displayed contains political or issue advertising	<u>Measure 6.1</u>	No	Commitment not subscribed (see below)
	<u>Measure 6.2</u>	No	
	<u>Measure 6.3</u>	No	
	<u>Measure 6.4</u>	No	
	<u>Measure 6.5</u>	No	

Reasons for *not subscribing* to Commitment 6 (if applicable):

TikTok prohibits political advertising so Chapter 3 is not relevant, pertinent or practicable as it is mainly targeted towards platforms that allow such advertising. However, TikTok will endeavour to continue to provide the political advertising enforcement metrics that it has provided previously within Chapter 2 of its reports in order to be transparent.

<u>Commitment 7</u> Relevant Signatories commit to put proportionate and appropriate identity verification systems in place for sponsors and providers of advertising services acting on behalf of sponsors placing political or issue ads. Relevant signatories will make sure that labelling and user-facing transparency requirements are met before allowing placement of such ads.	<u>Measure 7.1</u>	No	Commitment not subscribed (see below)
	<u>Measure 7.2</u>	No	
	<u>Measure 7.3</u>	No	
	<u>Measure 7.4</u>	No	

Reasons for *not subscribing* to Commitment 7 (if applicable):

TikTok prohibits political advertising so Chapter 3 is not relevant, pertinent or practicable as it is mainly targeted towards platforms that allow such advertising. However, TikTok will endeavour to continue to provide the political advertising enforcement metrics that it has provided previously within Chapter 2 of its reports in order to be transparent.

<u>Commitment 8</u> Relevant Signatories commit to provide transparency information to users about the political or issue ads they see on their service.	<u>Measure 8.1</u>	No	Commitment not subscribed (see below)
	<u>Measure 8.2</u>	No	

Reasons for *not subscribing* to Commitment 8 (if applicable):

TikTok prohibits political advertising so Chapter 3 is not relevant, pertinent or practicable as it is mainly targeted towards platforms that allow such advertising. However, TikTok will endeavour to continue to provide the political advertising enforcement metrics that it has provided previously within Chapter 2 of its reports in order to be transparent.

<u>Commitment 9</u> Relevant Signatories commit to provide users with clear, comprehensible, comprehensive information about why they are seeing a political or issue ad.	<u>Measure 9.1</u>	No	Commitment not subscribed (see below)
	<u>Measure 9.2</u>	No	

Reasons for *not subscribing* to Commitment 9 (if applicable):

TikTok prohibits political advertising so Chapter 3 is not relevant, pertinent or practicable as it is mainly targeted towards platforms that allow such advertising. However, TikTok will endeavour to continue to provide the political advertising enforcement metrics that it has provided previously within Chapter 2 of its reports in order to be transparent.

<u>Commitment 10</u> Relevant Signatories commit to maintain repositories of political or issue advertising and ensure their currentness, completeness, usability and quality, such that they contain all political and issue advertising served, along with the necessary information to comply with their legal obligations and with transparency commitments under this Code.	<u>Measure 10.1</u>	No	Commitment not subscribed (see below)
	<u>Measure 10.2</u>	No	
Reasons for <i>not subscribing</i> to Commitment 10 (if applicable):			
<u>Commitment 11</u> Relevant Signatories commit to provide application programming interfaces (APIs) or other interfaces enabling users and researchers to perform customised searches within their ad repositories of political or issue advertising and to include a set of minimum functionalities as well as a set of minimum search criteria for the application of APIs or other interfaces.	<u>Measure 11.1</u>	No	Commitment not subscribed (see below)
	<u>Measure 11.2</u>	No	
	<u>Measure 11.3</u>	No	
	<u>Measure 11.4</u>	No	
Reasons for <i>not subscribing</i> to Commitment 11 (if applicable):			

TikTok prohibits political advertising so Chapter 3 is not relevant, pertinent or practicable as it is mainly targeted towards platforms that allow such advertising. However, TikTok will endeavour to continue to provide the political advertising enforcement metrics that it has provided previously within Chapter 2 of its reports in order to be transparent.

<u>Commitment 12</u> Relevant Signatories commit to increase oversight of political and issue advertising and constructively assist, as appropriate, in the creation, implementation and improvement of political or issue advertising policies and practices.	<u>Measure 12.1</u>	No	Commitment not subscribed (see below)
	<u>Measure 12.2</u>	No	
	<u>Measure 12.3</u>	No	

Reasons for *not subscribing* to Commitment 12 (if applicable):

TikTok prohibits political advertising so Chapter 3 is not relevant, pertinent or practicable as it is mainly targeted towards platforms that allow such advertising. However, TikTok will endeavour to continue to provide the political advertising enforcement metrics that it has provided previously within Chapter 2 of its reports in order to be transparent.

<u>Commitment 13</u> Relevant Signatories agree to engage in ongoing monitoring and research to understand and respond to risks related to Disinformation in political or issue advertising.	<u>Measure 13.1</u>	No	Commitment not subscribed (see below)
	<u>Measure 13.2</u>	No	
	<u>Measure 13.3</u>	No	

Reasons for *not subscribing* to Commitment 13 (if applicable):

TikTok prohibits political advertising so Chapter 3 is not relevant, pertinent or practicable as it is mainly targeted towards platforms that allow such advertising. However, TikTok will endeavour to continue to provide the political advertising enforcement metrics that it has provided previously within Chapter 2 of its reports in order to be transparent.

Information on future considerations or plans:

[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]

IV. Integrity of Services		
<u>List of adopted commitments and measures</u>	<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: • <u>Reason for not subscribing (at the service level)</u> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]
<u>Commitment 14</u> <p>In order to limit impermissible manipulative behaviours and practices across their services, Relevant Signatories commit to put in place or further bolster policies to address both misinformation and disinformation across their services, and to agree on a cross-service understanding of manipulative behaviours, actors and practices not permitted on their services.</p> <p>Such behaviours and practises, which should periodically be reviewed in light with the latest evidence on the conducts and TTPs employed by malicious actors, such as the AMITT Disinformation Tactics, Techniques and Procedures Framework, include:</p> <ul style="list-style-type: none"> - The creation and use of fake accounts, account takeovers and bot-driven amplification, - Hack-and-leak operations, - Impersonation, - Malicious deep fakes, 	<u>Measure 14.1</u> Yes <u>Measure 14.2</u> Yes <u>Measure 14.3</u> Yes	

<ul style="list-style-type: none"> - The purchase of fake engagements, - Non-transparent paid messages or promotion by influencers, - The creation and use of accounts that participate in coordinated inauthentic behaviour, - User conduct aimed at artificially amplifying the reach or perceived public support for disinformation. 			
Reasons for <i>not</i> subscribing to Commitment 14 (if applicable):			
<u>Commitment 15</u> Relevant Signatories that develop or operate AI systems and that disseminate AI-generated and manipulated content through their services (e.g. deepfakes) commit to take into consideration the transparency obligations and the list of manipulative practices prohibited under the proposal for Artificial Intelligence Act.	<u>Measure 15.1</u> <u>Measure 15.2</u>	Yes Yes	TikTok remains subscribed, and note that its compliance with the AI Act is out of scope of auditing of Commitment 15. Rather, the focus of Commitment 15 is the policies, processes and tools in place to label AI-generated content and respond to the dissemination of harmful AI-generated content.
Reason for <i>not</i> subscribing to Commitment 15 (if applicable):			
<u>Commitment 16</u> Relevant Signatories commit to operate channels of exchange between their relevant teams in order to	<u>Measure 16.1</u>	Yes	

proactively share information about cross-platform influence operations, foreign interference in information space and relevant incidents that emerge on their respective services, with the aim of preventing dissemination and resurgence on other services, in full compliance with privacy legislation and with due consideration for security and human rights risks.	<u>Measure 16.2</u>	Yes	
Reason for <i>not</i> subscribing to Commitment 16 (if applicable):			
Information on future considerations or plans: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i>			

V. Empowering Users			
<u>List of adopted commitments and measures</u>	<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]	
<u>Commitment 17</u> In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, Relevant Signatories commit to continue and strengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups	<u>Measure 17.1</u>	Yes	
	<u>Measure 17.2</u>	Yes	
	<u>Measure 17.3</u>	Yes	
Reasons for <i>not</i> subscribing to Commitment 17 (if applicable):			
<u>Commitment 18</u> Relevant Signatories commit to minimise the risks of viral propagation of misinformation or disinformation by adopting safe design practices as they develop their systems, policies, and features	<u>Measure 18.1</u>	No	TikTok already implements and addresses this Measure through the implementation of the DSA (more specifically through: Articles 27, 34 and 35). Its compliance with the requirements of the DSA is subject to the annual DSA audit.
	<u>Measure 18.2</u>	Yes	
	<u>Measure 18.3</u>	No	From a practical perspective, this Measure lacks

			clarity and details regarding the research efforts signatories are expected to participate in or fund. TikTok collaborates and empowers the research community in many ways (as described under Chapter VI of the Code), and continues to consider how best to further strengthen this cooperation. In addition, this Measure will lack relevance or pertinence with the impending adoption of the DSA Delegated Act on vetted researcher access to data which is expected to materially increase the scope and scale of research that can be undertaken on this topic (and other topics).
Reasons for <i>not</i> subscribing to Commitment 18 (if applicable):			
<u>Commitment 19</u> Relevant Signatories using recommender systems commit to make them transparent to the recipients regarding the main criteria and parameters used for prioritising or deprioritising information, and provide options to users about recommender systems, and make available information on those options	<u>Measure 19.1</u>	Yes	
Reason for <i>not</i> subscribing to Commitment 19 (if applicable):			

<p><u>Commitment 20</u></p> <p>Relevant Signatories commit to empower users with tools to assess the provenance and edit history or authenticity or accuracy of digital content</p>	<p><u>Measure 20.1</u></p>	<p>No</p>	<p>TikTok will remain unsubscribed to this Commitment as the tools and standards for checking the authenticity and provenance of content are still relatively nascent and being tested, impacting practicality. TikTok is, however, fully committed to transparency regarding the origin and authenticity of the content shared on its platform and has recently made significant progress in this space, including by being the first in the industry to implement the C2PA standard in 2024 and by developing an auto-labeling tool. As progress is made in this space, TikTok will review and assess whether a sufficient level of certainty and confidence is reached such that it would be able to subscribe.</p>
	<p><u>Measure 20.2</u></p>	<p>No</p>	<p>TikTok will remain unsubscribed to this Commitment as the tools and standards allowing it to check the authenticity and provenance of content are still relatively nascent and being tested, impacting practicality. TikTok is, however, fully committed to transparency regarding the origin and authenticity of the content shared on its platform and has recently made significant progress in this space, including by being the first in the industry to implement the C2PA standard in 2024 and by developing a first-of-its-kind auto-labeling tool. As progress is made in this space, TikTok will review and assess whether a sufficient level of certainty and confidence is reached such that it would be able to subscribe.</p>

Reason for *not subscribing* to Commitment 20 (if applicable):

See above.

<p><u>Commitment 21</u></p> <p>Relevant Signatories commit to strengthen their efforts to better equip users to identify Disinformation. In particular, in order to enable users to navigate services in an informed way, Relevant Signatories commit to facilitate, across all Member States languages in which their services are provided, user access to tools for assessing the factual accuracy of sources through fact-checks from fact-checking organisations that have flagged potential Disinformation, as well as warning labels from other authoritative sources</p>	<p><u>Measure 21.1</u></p>	<p>Yes</p>	
	<p><u>Measure 21.2</u></p>	<p>No</p>	<p>This Measure is not practicable as TikTok does not currently deploy targeted warnings or updates to users.</p>
	<p><u>Measure 21.3</u></p>	<p>No</p>	<p>This Measure is not practicable as TikTok does not currently use labelling or warning systems.</p>

Reason for *not subscribing* to Commitment 21 (if applicable):

<p><u>Commitment 22</u></p> <p>Relevant Signatories commit to provide users with tools to help them make more informed decisions when they encounter online information that may be false or misleading, and to facilitate user access to tools and information to assess the trustworthiness of information sources, such as indicators of trustworthiness for informed online navigation, particularly relating to societal issues or debates of general interest</p>	<p><u>Measure 22.1</u></p>	<p>No</p>	<p>TikTok had not previously subscribed to Measures 22.1 to 22.6 which are not pertinent to its service given that TikTok does not deploy or provide trustworthiness indicators. TikTok instead relies on other means, such as fact-checking and media literacy campaigns, in order to empower its users and enable them to assess the veracity and relevance of the content they are exposed to.</p>
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	<u>Measure 22.2</u>	No	Same as above.
	<u>Measure 22.3</u>	No	Same as above.
	<u>Measure 22.4</u>	No	This Measure is not relevant as TikTok is not a provider of trustworthiness indicators.
	<u>Measure 22.5</u>	No	This Measure is not relevant as TikTok is not a provider of trustworthiness indicators.
	<u>Measure 22.6</u>	No	This Measure is not relevant as TikTok is not a provider of trustworthiness indicators.
	<u>Measure 22.7</u>	Yes	
Reason for <i>not</i> subscribing to Commitment 22 (if applicable):			
<u>Commitment 23</u> Relevant Signatories commit to provide users with the functionality to flag harmful false and/or misleading information that violates Signatories policies or terms of service	<u>Measure 23.1</u>	Yes	
	<u>Measure 23.2</u>	Yes	
Reason for <i>not</i> subscribing to Commitment 23 (if applicable):			
<u>Commitment 24</u>	<u>Measure 24.1</u>	Yes	

<p>Relevant Signatories commit to inform users whose content or accounts has been subject to enforcement actions (content/accounts labelled, demoted or otherwise enforced on) taken on the basis of violation of policies relevant to this section (as outlined in Measure 18.2), and provide them with the possibility to appeal against the enforcement action at issue and to handle complaints in a timely, diligent, transparent, and objective manner and to reverse the action without undue delay where the complaint is deemed to be founded</p>			
<p>Reason for <i>not subscribing</i> to Commitment 24 (if applicable):</p>			
<p><u>Commitment 25</u></p> <p>In order to help users of private messaging services to identify possible disinformation disseminated through such services, Relevant Signatories that provide messaging applications commit to continue to build and implement features or initiatives that empower users to think critically about information they receive and help them to determine whether it is accurate, without any weakening of encryption and with due regard to the protection of privacy</p>	<p><u>Measure 25.1</u></p>	<p>No</p>	<p>This Measure is not relevant as TikTok is not a messaging platform.</p>
<p><u>Measure 25.2</u></p>			
<p>Reason for <i>not subscribing</i> to Commitment 25 (if applicable):</p> <p>This Commitment is not relevant as TikTok is not a messaging platform.</p>			

Information on future considerations or plans:

[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]

VI. Empowering the Research Community			
<u>List of adopted commitments and measures</u>	<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]	
<u>Commitment 26</u> Relevant Signatories commit to provide access, wherever safe and practicable, to continuous, real-time or near real-time, searchable stable access to non-personal data and anonymised, aggregated, or manifestly-made public data for research purposes on Disinformation through automated means such as APIs or other open and accessible technical solutions allowing the analysis of said data	<u>Measure 26.1</u> <u>Measure 26.2</u> <u>Measure 26.3</u>	Yes Yes Yes	
Reasons for not subscribing to Commitment 26 (if applicable):			
<u>Commitment 27</u> Relevant Signatories commit to provide vetted researchers with access to data necessary to undertake research on Disinformation by developing, funding, and cooperating with an independent,	<u>Measure 27.1</u>	No	In the context of the adoption of the upcoming related delegated act on vetted researcher access to data, this Measure may overlap with and cut across equivalent or alternative measures provided for within that act.

<p>third-party body that can vet researchers and research proposals</p>			<p>In addition, this Commitment requires a joint industry commitment which is non-existent at the moment, rendering it not practicable.</p> <p>TikTok remains fully engaged and committed to providing access to researchers to data in line with its obligations under the DSA, and to relevant and pertinent measures subscribed to under this Code.</p>
	<u>Measure 27.2</u>	No	Same as above.
	<u>Measure 27.3</u>	No	Same as above.
	<u>Measure 27.4</u>	No	Same as above. In any event, TikTok demonstrated its commitment in this area by being one of two platforms to participate in the pilot conducted in respect of data access for vetted researchers.
<p>Reason for <i>not</i> subscribing to Commitment 27 (if applicable):</p> <p>See above.</p>			
<p><u>Commitment 28</u></p> <p>Relevant Signatories commit to support good faith research into Disinformation that involve their services</p>	<u>Measure 28.1</u>	Yes	
	<u>Measure 28.2</u>	Yes	
	<u>Measure 28.3</u>	Yes	

	<u>Measure 28.4</u>	No	This Measure lacks sufficient details and clarity on the framework, purposes, processes and the management of the funds to be made available and is therefore not practicable.
Reason for <i>not subscribing</i> to Commitment 28 (if applicable):			
Commitment 29 Relevant Signatories commit to conduct research based on transparent methodology and ethical standards, as well as to share datasets, research findings and methodologies with relevant audiences	<u>Measure 29.1</u>	No	This Measure applies to researchers and is not applicable to TikTok.
	<u>Measure 29.2</u>	No	This Measure applies to researchers and is not applicable to TikTok.
	<u>Measure 29.3</u>	No	This Measure applies to researchers and is not applicable to TikTok.
Reason for <i>not subscribing</i> to Commitment 29 (if applicable):			
This Commitment applies to researchers and is not applicable to TikTok.			
Information on future considerations or plans: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i>			

VII. Empowering the Fact-checking Community			
<u>List of adopted commitments and measures</u>	<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]	
<u>Commitment 30</u> Relevant Signatories commit to establish a framework for transparent, structured, open, financially sustainable, and non-discriminatory cooperation between them and the EU fact-checking community regarding resources and support made available to fact-checkers.	<u>Measure 30.1</u>	Yes	TikTok is prepared to commit to certain Chapter VII fact-checking Measures on the condition that other Signatories providing similar services do likewise. This collective approach will ensure a consistent and collaborative effort across the industry, increasing the effectiveness of these Measures and reinforcing the shared responsibility necessary to achieve the Code's objectives.
	<u>Measure 30.2</u>	Yes	
	<u>Measure 30.3</u>	Yes	
	<u>Measure 30.4</u>	Yes	
Reasons for not subscribing to Commitment 30 (if applicable):			
<u>Commitment 31</u> Relevant Signatories commit to integrate, showcase, or otherwise consistently use fact-checkers' work in their platforms' services, processes, and contents; with full coverage of all Member States and languages	<u>Measure 31.1</u>	No	This Measure lacks sufficient clarity for TikTok to subscribe. TikTok's partnership with fact-checkers is a pillar of its strategy to combat disinformation. TikTok integrates independent fact-checkers' work in its processes as further described under Chapter VII of the Code.

	<u>Measure 31.2</u>	Yes	<p>TikTok is prepared to commit to certain Chapter VII fact-checking Measures on the condition that other Signatories providing similar services do likewise. This collective approach will ensure a consistent and collaborative effort across the industry, increasing the effectiveness of these Measures and reinforcing the shared responsibility necessary to achieve the Code's objectives.</p> <p>With respect to Measure 31.2, TikTok's fact-checking process is unique to its platform and may differ from other signatories of the COPD. TikTok remains fully committed to actively engaging with fact-checkers as appropriate to determine the veracity of content. TikTok commits to employing mechanisms to integrate fact checks into its workflows, to the extent that the examples provided in this Measure are relevant and pertinent to TikTok and its fact-checking processes.</p>
	<u>Measure 31.3</u>	No	<p>This Measure requires the involvement of several platforms as well as an industry alignment on the common repository project and the funding structure, which is non-existent at the moment and therefore not practicable. This does not prevent TikTok from operating its own fact-checked claims repository.</p>
	<u>Measure 31.4</u>	No	<p>Same as above.</p>

Reason for <i>not</i> subscribing to Commitment 31 (if applicable):			
<u>Commitment 32</u> Relevant Signatories commit to provide fact-checkers with prompt, and whenever possible automated, access to information that is pertinent to help them to maximise the quality and impact of fact-checking, as defined in a framework to be designed in coordination with EDMO and an elected body representative of the independent European fact-checking organisations.	<u>Measure 32.1</u> <u>Measure 32.2</u>	Yes Yes	<p>TikTok is prepared to commit to certain Chapter VII fact-checking Measures on the condition that other Signatories providing similar services do likewise. This collective approach will ensure a consistent and collaborative effort across the industry, increasing the effectiveness of these Measures and reinforcing the shared responsibility necessary to achieve the Code's objectives.</p> <p>TikTok is prepared to commit to certain Chapter VII fact-checking Measures on the condition that other Signatories providing similar services do likewise. This collective approach will ensure a consistent and collaborative effort across the industry, increasing the effectiveness of these Measures and reinforcing the shared responsibility necessary to achieve the Code's objectives.</p> <p>With respect to Measure 32.2, TikTok's fact-checking process is unique to its platform and may differ from other signatories of the COPD. TikTok remains fully committed to actively engaging with fact-checkers as appropriate to determine the veracity of content. TikTok commits to providing appropriate interfaces to fact-checking organisations, to the extent that doing so is relevant, pertinent and practicable with TikTok's fact-checking processes and systems.</p>

	<u>Measure 32.3</u>	Yes	TikTok is prepared to commit to certain Chapter 7 fact-checking Measures on the condition that other Signatories providing similar services do likewise. This collective approach will ensure a consistent and collaborative effort across the industry, increasing the effectiveness of these Measures and reinforcing the shared responsibility necessary to achieve the Code's objectives.
Reason for <i>not</i> subscribing to Commitment 32 (if applicable):			
<u>Commitment 33</u> Relevant Signatories (i.e. fact-checking organisations) commit to operate on the basis of strict ethical and transparency rules, and to protect their independence.	<u>Measure 33.1</u>	No	This Measure is not relevant to TikTok as it applies to fact-checking organisations.
Reason for <i>not</i> subscribing to Commitment 33 (if applicable):			
This Commitment applies to fact-checking organisations.			
Information on future considerations or plans: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i>			

VIII. Transparency Centre		
<u>List of adopted commitments and measures</u>	<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: • <u>Reason for not subscribing (at the service level)</u> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]
<u>Commitment 34</u> To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website	<u>Measure 34.1</u> Yes	
	<u>Measure 34.2</u> Yes	
	<u>Measure 34.3</u> Yes	
	<u>Measure 34.4</u> Yes	
	<u>Measure 34.5</u> Yes	
Reasons for not subscribing to Commitment 34 (if applicable):		
<u>Commitment 35</u> Signatories commit to ensure that the Transparency Centre contains all the relevant information related to the implementation of the Code's Commitments and Measures and that this information is presented in an easy-to-understand manner, per service, and is easily searchable.	<u>Measure 35.1</u> Yes	
	<u>Measure 35.2</u> Yes	
	<u>Measure 35.3</u> Yes	
	<u>Measure 35.4</u> Yes	
	<u>Measure 35.5</u> Yes	

	<u>Measure 35.6</u>	Yes	
Reason for <i>not</i> subscribing to Commitment 35 (if applicable):			
<u>Commitment 36</u> Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner	<u>Measure 36.1</u>	Yes	
	<u>Measure 36.2</u>	Yes	
	<u>Measure 36.3</u>	Yes	
Reason for <i>not</i> subscribing to Commitment 36 (if applicable):			
Information on future considerations or plans: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i>			

IX. Task-force		
<u>List of adopted commitments and measures</u>	<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: • <u>Reason for not subscribing (at the service level)</u> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]
<u>Commitment 37</u> Signatories commit to participate in the Permanent Task-force. The Task-force includes the Signatories of the Code and representatives from EDMO and ERGA. It is chaired by the European Commission and includes representatives of the European External Action Service (EEAS). The Task-force can also invite relevant experts as observers to support its work. Decisions of the Taskforce are made by consensus.	<u>Measure 37.1</u> Yes	
	<u>Measure 37.2</u> Yes	
	<u>Measure 37.3</u> Yes	
	<u>Measure 37.4</u> Yes	
	<u>Measure 37.5</u> Yes	
	<u>Measure 37.6</u> Yes	
Reasons for not subscribing to Commitment 37 (if applicable):		
Information on future considerations or plans: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i>		

X. Monitoring Framework		
<u>List of adopted commitments and measures</u>	<u>Subscribed</u> <u>(including indication about</u> <u>which of the signatory's</u> <u>services are subscribed to)</u>	Additional comment including: • <u>Reason for not subscribing</u> <u>(at the service level)</u> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]
<u>Commitment 38</u> The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes to ensure the implementation of their commitments under the Code.	Yes	
Reasons for <i>not</i> subscribing to Commitment 38 (if applicable):		
<u>Commitment 39</u> Signatories commit to provide to the European Commission, within 1 month after the end of the implementation period (6 months after this Code's signature) the baseline reports as set out in the Preamble.	No	
Reasons for <i>not</i> subscribing to Commitment 39 (if applicable):		
This commitment was time-relevant and has now lapsed.		

<p><u>Commitment 40</u></p> <p>Signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code's Commitments and Measures by each Signatory, service and at Member State level.</p>	<u>Measure 40.1</u>	Yes	
	<u>Measure 40.2</u>	Yes	
	<u>Measure 40.3</u>	Yes	
	<u>Measure 40.4</u>	Yes	
	<u>Measure 40.5</u>	Yes	
	<u>Measure 40.6</u>	Yes	
<p>Reason for <i>not</i> subscribing to Commitment 40 (if applicable):</p>			
<p><u>Commitment 41</u></p> <p>Signatories commit to work within the Task-force towards developing Structural Indicators and deliver a first set of them within 9 months from the signature of this Code; and to publish an initial measurement alongside their first full report. To achieve this goal, Signatories commit to support their implementation, including the testing and adapting of the initial set of Structural Indicators agreed in this Code. This, in order to assess the effectiveness of the Code in reducing the spread of online disinformation for each of the relevant Signatories, and for the entire online ecosystem in the EU and at Member State level. Signatories will collaborate with relevant actors in that regard, including ERGA and EDMO</p>	<u>Measure 41.1</u>	Yes	
	<u>Measure 41.2</u>	Yes	
	<u>Measure 41.3</u>	Yes	
<p>Reason for <i>not</i> subscribing to Commitment 41 (if applicable):</p>			

<p><u>Commitment 42</u></p> <p>Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Task-force</p>	<p>Yes</p>
<p>Reason for <i>not subscribing</i> to Commitment 42 (if applicable):</p>	
<p><u>Commitment 43</u></p> <p>Signatories commit to produce reports and provide data following the harmonised reporting templates and refined methodology for reporting and data disclosure as agreed in the Task-force</p>	<p>Yes</p>
<p>Reason for <i>not subscribing</i> to Commitment 43 (if applicable):</p>	
<p><u>Commitment 44</u></p> <p>Relevant Signatories that are providers of Very Large Online Platforms commit, seeking alignment with the Digital Services Act, to be audited at their own expense, for their compliance with the commitments undertaken pursuant to this Code. Audits should be performed by organisations, independent from, and without conflict of interest with, the provider of the Very Large Online Platform concerned. Such organisations shall have proven expertise in the area of disinformation, appropriate technical competence and capabilities and have proven objectivity and professional ethics, based in particular on adherence to auditing standards and guidelines</p>	<p>Not applicable (removed from Code)</p>

Reason for not subscribing to Commitment 44 (if applicable):

Information on future considerations or plans:

[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]

Signature, date and place

Redacted

17 January 2025

Exhibit 12



TikTok White Paper:

The Digital Services Act

TikTok's mission is to inspire creativity and bring joy

As a global community that thrives on creativity and expression, it's important that users feel safe and comfortable in this community. Our policies and tools are developed to promote a positive and safe environment for our community, and we trust that users will respect and utilize these measures to keep TikTok fun and welcoming for everyone. The safety and security of our European users is our top priority in Europe and in January 2020, we established a major Trust and Safety Hub in Dublin, Ireland to lead our work in this area.

This paper sets out TikTok's broad principles regarding the fundamental issues addressed in the European Commission's consultation on the Digital Services Act.



Tackling illegal content

1. Platforms have a key role to play in tackling illegal user generated content

Platforms that allow user-generated content should be effectively moderated and for those content moderators, reviewing and removing illegal content should be the priority. Once notified, UGC platforms should act quickly to remove such content.

2. Content moderation by platforms should not replace the role of courts or police

Where necessary, platforms should provide necessary information to law enforcement, in compliance with local law and due process. However, legislation that requires online intermediaries to seek and sentence users is a step too far. It would not be appropriate to confer upon platforms the power and responsibility of law enforcement authorities or judicial processes.

3. Platforms can be held to account to remove illegal content effectively, fairly and quickly, provided the requirements are clear and appropriate

Platforms can be held to account to ensure that they have effective and timely mechanisms in place to remove illegal content once properly notified. Some countries in Europe, such as Germany, have already legislated to hold online intermediaries accountable for the removal of illegal content. Other countries, such as France and the United Kingdom, are in the process of developing legislation. Penalties could be applied to ensure a high level of compliance, however, penalties should apply to systemic failures rather than to single moderation errors.



Tackling harmful content

4. Harmful content cannot be dealt with in the same way as illegal content

TikTok is committed to tackling harmful content and has a range of policies and processes in place to deal with harmful content that violates our community guidelines quickly and effectively. However, harmful content should not be dealt with in the same way as illegal content. It is not always easy to determine if a video violates the law but at least there are written definitions and case law to guide moderators. Harmful content is more frequently open to debate and perception is shaped by context. For example, if one examines the use of slurs, such as racial or ethnic epithets, should they always be prohibited, or should they be permitted in certain contexts, where those slurs are being appropriated or challenged by the community they are intended to attack? UGC platform content moderators have to make these kinds of complex interpretations all the time. In a scenario where there are harsh penalties for those moderators if they act too slowly or remove too little, then UGC platforms will shift to a model where they inevitably block more and more legitimate speech and creativity. We cannot apply the same hard and fast rules that apply to illegal content without damaging freedom of expression.

5. Users should be able to read clear community guidelines and choose between different platforms

To tackle harmful but legal content, user-generated content platforms should have clear community guidelines. These allow users to see what type of community engagement will be allowed and therefore what type of experience they are likely to encounter. These community guidelines should not be required to be consistent across platforms just as the type of unwritten community guidelines that people adhere to in the physical world - a church, a library, a pub, a football stadium - are not the same. A platform like TikTok does not have the same tolerance for certain types of content as YouTube. An adult video hosting site has a different approach altogether. It does not make sense to force UGC platforms to apply the same consistent guidelines but users should be able to read clearly the community guidelines for each site so that they can make an informed choice. Platforms should rigorously enforce their own guidelines.



Challenges and limitations

6. Shorter time limits for removal are likely to result in more over blocking

UGC platforms should act fast but the effect of a short time frame is that it reduces the scope to moderate with nuance. As a result, platforms under pressure to meet a deadline may err on the side of caution and block more than they would if they had more time to consider the full complexity and context of the content that is being reviewed. Moderation can be complicated so there should always be leeway for special and complicated cases to avoid suppressing freedom of expression.

7. There is a balance between automation to help make platforms free from harm and over-moderation that threatens freedom of expression

Machine learning can help us identify and tackle harmful content but technology today is not so advanced that we can solely rely on it to enforce our policies. For instance, context can be important when determining whether certain content, like satire, is violative. As such, our team of trained moderators helps to review and remove content that violates our standards. In some cases, this team proactively removes evolving or trending violating content, such as dangerous challenges or harmful misinformation. AI and machine learning can assist and improve the process of detection, review and removal of videos but Europe should be cautious about placing too great an emphasis on speed and removal of harmful content at the cost of nuance and freedom of expression.

Reforming legislation

8. A European harmonized approach is necessary; 27 different regimes would be unworkable

Europe should not create 27 different versions of this Act but a harmonized approach, maintaining the "country of origin" principle, would allow platforms to operate consistently and at scale in a way that gives member states reassurance that UGC platforms are



performing content moderation of illegal content to a high standard.

9. ‘Notice and action’ should remain the foundation for platforms in order to empower users

TikTok exists for its community to create videos and inspire joy. The ease of creation, the breadth of content, and the engagement between our users are what makes TikTok unique. We have a clear set of community guidelines and, as long as they stick to the rules, our users can create, post and share videos. This is only possible because of the principle of ‘notice and action’ that underpins the current European regulatory structure. Plainly speaking, this means that a platform is not liable for the content posted by a user but they must act once they have been properly notified. The alternative scenario - where platforms are immediately liable for all the content that a user creates - would require armies of lawyers to scrutinise every word, image, video or emoji that a user wishes to post before it could become public. Such a model would not only be unworkable, it would be anathema to the TikTok community which is built on the ease of creation and the spontaneity of engagement.

10. However change is needed and we support the idea of a ‘good Samaritan’ principle

From the perspective of a platform - and for society - the current system has a flaw that needs to be fixed. In the simplest terms, if a platform looks for harmful and illegal content, it could become liable; if it does not look, it cannot become liable. This acts as a disincentive against platforms that want to invest in and develop techniques to detect, review and remove videos that contain - for example - child sexual abuse material or terrorist-related content because of fears that they could become liable if any of those videos contain content that they were not looking for but which frequently attracts litigation, such as defamation, trademark or copyright infringement. There is already established in law the notion of a ‘good Samaritan’ clause, whereby the intention to do something that is clearly beneficial to society is not punished by laws designed to protect society from harm. The Digital Services Act provides an opportunity to remove this perverse disincentive that deters platforms from detecting, reviewing and removing illegal content by establishing the principle of a good Samaritan clause.

11. Transparency is essential

TikTok believes that all companies should disclose their algorithms, moderation policies, and data flows to regulators. We will not wait for regulation to come, but instead TikTok has taken the first step by launching a Transparency and Accountability Center for moderation and data practices. Experts can observe our moderation policies in real-time,



as well as examine the actual code that drives our algorithms. This puts us a step ahead of the industry, and we encourage others to follow suit.



Exhibit 13

Theme	Category	Suggested Update	Individual	Timeline for Update
	Information missing (DSA compliance)	Under FYF eligibility standards - may need more of a call out for feed integrity / quality-specific policies, including those that don't slot perfectly under either fake engagement or shocking/graphic content-related [redacted] subsections.		Q4 2023
	Information missing (DSA compliance)	Reducing distribution of content is called "FYF eligibility" which is only for SFV and excludes other interaction features on TikTok. For example, Messaging might mask photo/video messages as a safety precaution or send direct message requests to the filtered inbox. I think this "FYF eligibility" verbiage in the [redacted] guidelines should be rewritten as if applicable platform-wide.		Q4 2023
General	Language/Definition/Terminology Update	Note that currently there is just one sentence in the "features" section that attempts to re-contextualize the entire CG for features. "Our guidelines listed above also apply to comments and messages. A violation of our rules will result in the removal of the content or a restriction on sending direct messages, and may lead to an account ban." Can verbiage like "FYF ineligible" be rephrased vaguely as "reduced" to be inclusive of other features? Example of CG now: "We make ineligible for the FYF certain content that may not be appropriate for a broad audience related to: (1) Behavioral Health, (2) Sensitive and Mature Themes, (3) Integrity and Authenticity, and (4) Regulated Goods." Example of CG proposed change: "There is some content that individual people may want to see, but that others may find problematic, so we make it harder to encounter. This includes content related to: (1) Behavioral Health, (2) Sensitive and Mature Themes, (3) Integrity and Authenticity, and (4) Regulated Goods"		Q4 2023
	Information missing (non-DSA compliance)	Would love a greater call out for features outside of SFV, even if high level / broad!	[redacted]	Q4 2023
	Information missing (DSA compliance)	Comments has expanded in its functionality to include static images and one-liners. In the future, the functionality may further expand to include stickers. The current comment section makes reference to the comment feature as a whole but does not highlight the differentiated enforcement that we intend to take [redacted] for static images and potentially for one-liners - for instance, we may decide to use the mask filter for static images and block the sending of one-liners that include certain violative keywords.		Q4 2023
	Information missing (non-DSA compliance)	There are other sub-features that are using the comment policy playbook but are not explicitly mentioned [redacted] in CGs - this includes POI/BookTok/Series reviews (i.e. similar to Yelp).		H1 2024
Comments	Information missing (DSA compliance)	The CGs also does not highlight that those under 16 are not allowed to receive comments from Everyone (but only from Mutual Friends or Nobody). See https://support.tiktok.com/en/account-and-privacy/account-privacy-settings/privacy-and-safety-settings-for-users-under-age-18	[redacted]	Q4 2023
	Information missing (DSA compliance)	Majority (>99%) of comments are machine moderated. This is not currently disclosed in the CGs. The treatment / enforcement approach for human and machine moderation also differs slightly - for instance, in human moderation we delete all comments if found to be violative, but in machine moderation we "fold" a partial of comments that our models are unable to ascertain to be violative at high precision.		Q4 2023
	Information missing (DSA compliance)	Finally, there is no mention of whether we will notify users when a piece of content is removed, and under what circumstances. For comments, we only notify users when a comment is deleted and provide a channel for appeal.	[redacted]	Q4 2023
	Information missing (DSA compliance)	Effects is not mentioned in the CGs. However, there is a section on the effect house beta website that lists out our Guidelines. Guidelines are currently in the process of being updated to align with the 2023 TT CG update.		Q4 2023
Effects	Information missing (non-DSA compliance)	In order to control for risks specific to effects, it would be beneficial to include that we take into account both real world and animated risks, as animated risks can still pose harm to users and/or brand. For some sections this is included, but it should be reflected across all issues.	[redacted]	H1 2024
	Information missing (non-DSA compliance)	As features like effects and audio mature, it may be worthwhile considering if they should be included under the 'Accounts and Features' section	[redacted]	H1 2024
	Information missing (non-DSA compliance)	Not youth-specific, but we don't currently have any references to Effects policies. It seems like a notable gap particularly given recent beauty filter escalations.	[redacted]	H1 2024
	Information missing (DSA compliance)	Amend "For You feed Eligibility Standards" (https://www.tiktok.com/community-guidelines/en/fyf-standards/) in order to properly mirror R3 live policies	[redacted]	Q4 2023
	Information missing (DSA compliance)	Add more information on feature related enforcement actions (eg NR in LIVE)	[redacted]	Q4 2023
	Information missing (DSA compliance)	This may include a little bit more detail w/r to LIVE R3-specific titles, as well as more information on what happens at the live level, e.g. under the "more information" section - perhaps we could make a call out about what happens when a "LIVE" does not get many views.	[redacted]	Q4 2023
LIVE	Information missing (DSA compliance)	We should call out that some of these feed eligibility standards apply to live subfeature access - such as LIVE gifting, subfeatures, etc (i.e. here thinking of the R3 "inorganic gift solicitation" policy which is around low quality / potentially spammy gift solicitation): e.g. here https://www.tiktok.com/community-guidelines/en/accounts-features/?cgversion=2023 and here: https://www.tiktok.com/community-guidelines/en/accounts-features/?cgversion=2023	[redacted]	Q4 2023
	Information missing (DSA compliance)	We may want to call out any restrictions at the account level when it comes to the discoverability of LIVE / video content: https://www.tiktok.com/community-guidelines/en/accounts-features/?cgversion=2023	[redacted]	Q4 2023
	Information missing (non-DSA compliance)	Amend the current "Age-restricted (18 years and older)" content scope to include additional scope of content targeted by the LIVE Content Level	[redacted]	H1 2024
	Information missing (non-DSA compliance)	Add a thorough section on LIVE education (right now LIVE is just "we follow Short Form CGs" but there can be so much more to be elaborated upon, reflecting the behaviours we wish to see on LIVE.	[redacted]	H1 2024
	2024 Policy Update	By the end of H1 2024: Account Discoverability System (ADS), which is not a policy but an automated account-level strategy where we will reduce discoverability (through search and feed) of accounts with high concentrations of NR/NFF content. To provide sufficient coverage for ADS in the CGs, we will need to expand the part of the CGs touching on Account (currently: "Repeatedly posting content that is allowed on our platform but not eligible for the FYF may lead to the account and its content being harder to find in search") to also provide for feed restrictions.		Q4 2023
Discoverability	2024 Policy Update	When/if we roll out ADS globally, we will need to update our language on feed ineligibility for repeatedly posting NR content	[redacted]	H1 2024
	Information missing (DSA compliance)	We are hoping to disclose more details on 1) hard interventions including Search Ban principles, Recommended Search terms removal, and Hashtag Removal; 2) soft interventions including video NR/NFF [redacted] effects in Search, Search reminders, and account search enforcements.		Q4 2023
	Format 2024 Policy Update	Add a sub-section on Search or Effects under Account and Features.	[redacted]	Q4 2023
		Add new Search Editorial and Recommendation Policies	[redacted]	H1 2024
Device Ban	Information missing (DSA compliance)	The enforcement of device ban is currently not represented in the CG. While I understand that there is a direction to move away from this enforcement, in the meantime we are still fielding questions by Creator Ops when Creator accounts get banned as "collateral" from device banning. It is also worth noting that CST [redacted] is currently enforcing device ban at scale for CSAM. It will be helpful to add a line in the CG to explain this enforcement (even without direct references to device ban) to make it more publicly defensible.		Q4 2023
	Other recommendation	Audio Feature will have an all-new 4.0 framework in August 2023: https://bytedance.us.feishu.cn/sheets/sttus4tlqlqrPQWia9nAgOAREgx?chunked=false&sheet=DeGzQW . This framework aligns Audio with all relevant GPF 4.0 titles. While these PBRs are customized for Audio, there are no Audio-only titles not also found in GPF 4.0. CGs aligned to SFV, therefore, will also be aligned with Audio once the feature is mapped to the new CGs in the December 2023 batch.	[redacted]	On Hold
Audio	Other recommendation	AIGC disclosure for Audio: We are scoping a CapCut/Branded Content-like badge to identify audio AIGC users. No impact on CGs, though we will make any necessary adjustments to our new escalation-only "Synthetic Media" title as public and legal sentiment toward audio AIGC evolves.	[redacted]	On Hold
	Other recommendation	We are also scoping auto-routing certain content to Integrity Operations, ERT, and CST. These are standard safety strategies on the SFV side; we are looking to match Audio Feature if we can. No affect on CGs.	[redacted]	On Hold

Exhibit 14

Theme	Category	Suggested Update	Individual	Timeline for Update
Exceptions	Information missing (non-DSA compliance)	Add section (or link to external resource) that provides detailed explanation and examples of exceptions, similar to: https://support.google.com/youtube/answer/6345162?hl=en	[redacted]	H1 2024
	Language/Definition/Terminology Update	Under Public Interest Exceptions, the following line isn't really accurate given youth-specific content and account policies - "Our approach to content moderation uses the same criteria, no matter who creates it."	[redacted]	H1 2024
	Information missing (non-DSA compliance)	Content around education and prevention. We allow it in most of our policies but it is not clear enough in the CGs. It might be worth detailing a bit the type of EDSA content we allow (e.i. drugs prevention, sex education, alcohol, etc.)	[redacted]	H1 2024
	Information missing (non-DSA compliance)	News and media. What can they show? Some policies have news and media exception but we do not accept everything. Maybe having more news and media exceptions in the CGs so they can understand what is possible to show and what is not. High profile news account being violated often.	[redacted]	H1 2024
	Format	One thing we could consider is whether for SGC, we would want to structure the CGs such that real-world torture, graphic violence etc is not allowed, but could be only restricted in some settings, such as fictional or public interest scenarios, and that we put this narrative together, as opposed to listing them individually, which is what is in the current version of the CGs. Essentially building out a spectrum of violence framework.	[redacted]	H1 2024
Overview	Language/Definition/Terminology Update	In the Overview section, the four pillars of moderation are remove, age-restrict, For You feed (FYF) eligibility standards, and empower users. "Empower" isn't explained or mentioned elsewhere in the CGs. Similar to our competitors, I think we should mention if/when we might empower/inform users (with warning or mask layer) either as a list of issues or in each respective issue vertical. This includes SGC, HHB, NSA (like EDSA or NSN), and MH (references to SSH and ED).	[redacted]	Q4 2023
	Information missing (DSA compliance)	Consider differentiating more clearly between NR and NFF moderation results by separating the enforcement results and listing those policy titles that trigger the respective enforcement action.	[redacted]	H1 2024
Localization	Information missing (non-DSA compliance)	Would like to see greater granularity to the role of localisation in our policies, how our policy actions can differ from one region to another and in what areas. We talk externally about the importance of localisation but there's not a lot to point to in the current CGs to illustrate that importance	[redacted]	H1 2024

Exhibit 15

Community Guidelines Survey

Product Policy Survey

Survey Overview

Our [HYPERLINK "https://www.tiktok.com/community-guidelines/en/" \h] (CGs) establish a set of norms and common code of conduct that provide for a safe and welcoming space for everyone. The primary motivation for the next round of CG updates is to achieve compliance with the Digital Services Act (DSA) and ensure every enforcement action we take is incorporated transparently into the CGs. We are hoping to do a smaller CG update in Q4 2023 and a larger update by the end of H1 2024 (dates to be confirmed with relevant xfn and leadership). Please let us know what you think we should include in the next round of CG updates by Friday, July 7th.

Survey Link: <https://wenjuan.feishu.cn/m?t=sHyBC8eEAENi-tel5>

Survey Questions

1. What team are you on? (required)
 - a. Issue Policy
 - b. Feature Policy
 - c. Regional Policy
2. Please carefully look at **your relevant section(s)** in the CGs. What's not represented (policies, enforcement outcomes, exceptions, etc)? Are we missing anything? What can be done better to represent your policies? (optional)
3. Do you have any **specific language changes** for existing content in the CGs (such as rationales, definitions, key terms, etc)? If so, please list which policy/section you are referencing and the specific update. (optional)
4. Do you have any proposed **structural changes** for the existing CGs? (optional)
5. Do you have any **new policies since the last CG update** (March 2023)? This includes escalation only policies. If so, please list the new policy title(s) and whether it impacts any existing policy outlined in the 2023 CGs. (optional)

6. Do you anticipate any **new policies before the end of H1 2024**? This includes escalation only policies. If so, please list the new policy title(s) and whether it impacts any existing policy outlined in the 2023 CGs. (optional)
7. What larger changes do you expect for your vertical/feature/market by the end of H1 2024 that may impact the CGs? (optional)
8. Do you have any proposed **process changes** for how we draft or publish the CGs? (optional)
9. Any other feedback you would like to share? (optional)

XFN Survey (Comms, Legal, Public Policy)

Survey Overview

Our TikTok Community Guidelines (CGs) establish a set of norms and common code of conduct that provide for a safe and welcoming space for everyone. The primary motivation for the next round of CG updates is to achieve compliance with the Digital Services Act (DSA) and ensure every enforcement action we take is incorporated transparently into the CGs. We are hoping to do a smaller CG update in Q4 2023 and a larger update by the end of H1 2024 (dates to be confirmed with relevant xfn and leadership). Please let us know what you think we should include in the next round of CG updates by [Friday, July 7th](#).

Survey Questions

1. What team are you on? (required)
2. What should we include in the next round of CG improvements? (optional)
3. Do you have any **specific language changes** for existing content in the CGs (such as rationales, definitions, key terms, exceptions, etc)? If so, please list which policy/section you are referencing and the specific update. (optional)
4. Do you have any proposed **structural changes** for the existing CGs? (optional)

5. Do you have any proposed **process changes** for how we draft or publish the CGs?
(optional)

6. Any other feedback you would like to share? (optional)

Exhibit 16

1. **Policy Accuracy and Transparency** - To ensure compliance with DSA, we included more information about policy enforcement, with a focus on feature policies, and ensured all current policies were reflected. We also included several new policies, and updated content for accuracy and clarification.
2. **Community Guidelines Accessibility** - To enhance accessibility, we updated content for readability, and implemented product updates to make it easier to navigate the document.

Exhibit 17

We have Community Guidelines to create a **welcoming, safe, and entertaining** experience.

The guidelines apply to **everyone** and **everything** on our. They include **rules** for what is allowed on TikTok, as well as for what is eligible for the For You feed (FYF).

To address new risks and harms, the guidelines are **updated** ongoing basis.

Overview

To prepare a 2024 CG update, we implemented a Phase which included:

1. Collecting feedback from **external partners**
2. Conducting an **internal survey** across teams to updates
3. Assessing our **compliance with the Digital Services Act (DSA)**
4. Analyzing the **impact** of the last CG update
5. Conducting **creator focus groups** to share feedback

Launch of Updated CGs

We launched the updated Community Guidelines on **April 17** and they went into effect on **May 17**.

This update builds on our ongoing work to improve understanding and bring greater transparency about our rules and how we enforce them.

Notes

Emailed out in advance and can be found on our website.

Key Changes in the CGs

- NEW OR UPDATED POLICIES
- IMPROVED ACCESSIBILITY
- ENHANCED TRANSPARENCY
- CLARIFIED TERMS AND EXAMPLES

NEW OR UPDATED POLICIES

Updates to our policies were integrated throughout the Community Guidelines, including updates related to:

- *Hate Speech*
- *Disordered Eating, Harmful Body Ideals, and Weight Management*
- *Overgeneralized Mental Health Content*
- *Misinformation*
- *Election Misconduct*

IMPROVED ACCESSIBILITY

Enhanced ease of **navigation** and **accessibility** through the following updates:

- Significantly **rewrote several sections** to improve readability and transparency
- **Updated headings** for clarity and parity
- Upgraded the webpage **search function** and improved elements of **visual design**
- **Aligned and standardized** language throughout the document
- Added **6 new languages** for translation (Hebrew, Albanian, Icelandic, Irish, Hindi, and Slovenian)

ENHANCED TRANSPARENCY

- Enhanced **transparency** about our moderation approach and outcomes, including additional information about:
 - Enforcement actions
 - Notice and Appeals
 - Quality assurance processes (for accounts that have gone through validation processes, such as verified accounts)
 - Content suitability assessments provided by [Common Sense Networks](#) for the [under-13 TikTok experience](#)
- Expanded the Accounts and Features section with a **new section on Search**

Notes

Warning labels - Dangerous Activities ◻Warning label/opt-in - Shocking and Graphic Content

CLARIFIED TERMS AND EXAMPLES

Clarified and refined language throughout the document, including:

- Updated or added **definitions** for terms across sections
- Expanded or clarified **policy language** and **examples**

Section II: External Platform Exhibits

Exhibit 18

From: [REDACTED] [REDACTED]@spotify.com]
on behalf of [REDACTED]@spotify.com> [REDACTED]@spotify.com]
Sent: 6/7/2020 4:54:54 PM
To: [REDACTED]@ec.europa.eu
CC: [REDACTED]@spotify.com]
Subject: Re: FW: Request for meeting - Spotify

Hi Filomena,

It was a pleasure seeing you online indeed, and I am happy to speak to you tomorrow. I am available at 15:30, would that work for you?

Kind regards,

[REDACTED]

On Fri, Jun 5, 2020 at 7:37 PM <[REDACTED]@ec.europa.eu> wrote:

Hi [REDACTED]

Sorry to get back only now, this period has been extremely intense and we did not have much time for meetings. Good that we managed to virtually “see” each other, although in a group exchange.

I’m writing to ask if you would you have time to speak briefly on Monday. I have a question on Spotify’s anti-disinformation actions.

Of course, we can also plan a DSA discussion, I suppose you will participate to the public consultation we just launched.

I’m available at 10:00 or after 15:00

Thanks in advance!

Filomena

From: [REDACTED] [REDACTED]@spotify.com>
Sent: Tuesday, May 26, 2020 1:36 PM
To: KOSINSKI Isabelle (CAB-BRETON) [REDACTED]@ec.europa.eu
Cc: [REDACTED] [REDACTED]@spotify.com>
Subject: Re: Request for meeting - Spotify

Dear Ms Kosinski,

I hope this email finds you well and safe.

I am following up on my email below to ask whether it would be possible to reschedule our meeting with Ms Chirico and Ms Schonieczna, for instance next week or the beginning of June?

We fully appreciate it is a very busy period, and would be very happy to arrange even a short discussion regarding the DSA and proposed regulation of gatekeeper platforms.

Thank you in advance.

Kind regards,

On Tue, 12 May 2020 at 15:19, [REDACTED] <[\[REDACTED\]@spotify.com](mailto:[REDACTED]@spotify.com)> wrote:

Dear Ms Kosinski,

I hope this email finds you safe and well.

I am coming back to you following our last exchange to ask whether we could re-organise our discussion with Ms Chirico and Ms Schonieczna, for instance next week or the week of 25th May?

We understand the work on the DSA package is advancing and would welcome the opportunity to share our views on the different elements, notably the regulation of platforms' market power. My Director of European Policy, [REDACTED], and I would join from our side.

We are very happy to adjust to the timing that suits Ms Chirico and Ms Schonieczna best and can use the conference call system of your choice. We can also set up a Zoom or Google Hangout if that's easier.

Kind regards,

[REDACTED]
[REDACTED] | Senior Manager, European Affairs
37 Square de Meeûs, Brussels
+ [REDACTED] | [\[REDACTED\]@spotify.com](mailto:[REDACTED]@spotify.com) | www.spotify.com
[REDACTED]

On Fri, 20 Mar 2020 at 16:21, [REDACTED] <[\[REDACTED\]@spotify.com](mailto:[REDACTED]@spotify.com)> wrote:

Dear Ms Kosinski,

Thank you very much for coming back to us anyway.

We fully understand and would be happy to come back to you at a later date, when the situation has hopefully calmed down.

Wishing you and the team our well wishes in the meantime.

Best regards,

On Fri, 20 Mar 2020 at 15:52, <[REDACTED]@ec.europa.eu> wrote:

Dear [REDACTED],

Thank you for your message.

Unfortunately due to the latest COVID-19 crisis development we have to cancel all the meetings scheduled until end of March in order to focus our work on the response to the crisis.

The situation is currently too unpredictable to propose new dates at this stage.

Thank you for your understanding.

Best regards,

Isabelle Kosinski

From: [REDACTED]@spotify.com>
Sent: Wednesday, March 18, 2020 6:29 PM
To: KOSINSKI Isabelle (CAB-BRETON) [REDACTED]@ec.europa.eu>
Cc: [REDACTED]@spotify.com>
Subject: Re: Demande de réunion Spotify - Ares(2020)882200 (FCH)

Dear Ms Kosinski,

I hope you and your colleagues, family and friends are well in these challenging times.

I wanted to follow up regarding our meeting with Ms Chirico and Ms Schonieczna, currently scheduled for 31st March at 10:30am.

We would very much like to maintain our discussion, as it relates to a number of initiatives that the Commission is currently working on (notably the different strands of the DSA package). In light of the current situation and a work-from-home policy on our side, we would therefore like to ask whether we could convert this meeting into a video-conference?

If this is convenient, we would be more than happy to provide a link or defer to your preferred system.

Thank you in advance for letting us know.

Best,

[REDACTED] | Senior Manager, European Affairs
37 Square de Meeûs, Brussels
+ [REDACTED] | [REDACTED]@spotify.com | www.spotify.com
[REDACTED]

On Wed, 26 Feb 2020 at 20:29, [REDACTED]@ec.europa.eu> wrote:

Dear [REDACTED],

I confirm the meeting on the 31st March at 10:30 in our premises, Berlaymont, rue de la Loi 200.

In order to arrange a smooth access to our building, please send back the attached document with the requested details for each attendee.

Best regards,

Isabelle KOSINSKI

Assistant in the Cabinet of Commissioner Thierry Breton



European Commission
Rue de la Loi 200 (BERL 10/270)
B-1049 Bruxelles
[REDACTED]

From: [REDACTED]@spotify.com>
Sent: Tuesday, February 25, 2020 1:16 PM
To: KOSINSKI Isabelle (CAB-BRETON) <[REDACTED]@ec.europa.eu>
Cc: [REDACTED] <[REDACTED]@spotify.com>; CAB BRETON ARCHIVES <CAB-BRETON-ARCHIVES@ec.europa.eu>
Subject: Re: Ares(2020)882200 - RE: Demande de réunion - [REDACTED], Head of Global Affairs and Chief Legal Officer Spotify Brussels 24-25/03/2020

Dear Ms Kosinski,

Thank you very much for your time on the phone this morning.

We would be delighted to meet with Ms Chirico and Ms Schonieczna on the different topics. [REDACTED] and I would be available on the following dates, if those are convenient? If not, please just let us know and we can propose alternatives.

- Friday 27 March (anytime until 3:30pm)
- Monday 30 March (anytime before 2pm)
- Tuesday 31 March (anytime apart from 12pm - 2:30pm)
- Wednesday 1st April (anytime after 12pm)

As I mentioned on the phone, there is also a possibility that our CEO Daniel Ek will come to Brussels in May. I have duly noted that the Commissioner would not be available on the current possible dates (7th and 11th May), but potentially in the second half of May depending on his schedule. Once we have more clarity on our CEO's diary, I will come back to you with additional information.

Thank you once again for your assistance.

Kind regards,

[REDACTED]
[REDACTED]
[REDACTED] | Senior Manager, European Affairs
37 Square de Meeûs, Brussels
+ [REDACTED] | [REDACTED]@spotify.com | www.spotify.com

On Mon, 24 Feb 2020 at 20:34, [REDACTED]@ec.europa.eu> wrote:

Dear [REDACTED],

On behalf of Commissioner Breton I would like to thank you for your meeting proposal.

Your message received our full attention. However, it will not be possible to organise a meeting on the proposed dates.

Meanwhile, as suggested by email to Ms Chirico on the 18/02, it would be possible to arrange a meeting with her and Ms Schonieczna on the topics mentioned in your email.

Their agenda for the coming weeks is already very busy. Please let me know if a meeting end of March/beginning April is fine for you and we will try to find a date.

Best regards,

Isabelle KOSINSKI

Assistant in the Cabinet of Commissioner Thierry Breton



European Commission
Rue de la Loi 200 (BERL 10/270)
B-1049 Bruxelles

From: [REDACTED]@spotify.com
Sent: Tuesday, February 11, 2020 9:26 AM
To: CAB BRETON CONTACT <CAB-BRETON-CONTACT@ec.europa.eu>
Cc: [REDACTED] <[\[REDACTED\]@spotify.com](mailto:[REDACTED]@spotify.com)>
Subject: Demande de réunion - [REDACTED], Head of Global Affairs and Chief Legal Officer Spotify Brussels
24-25/03/2020

Monsieur le Commissaire,

Veuillez trouver ci-joint une demande de réunion au nom de [REDACTED], Head of Global Affairs and Chief Legal Officer de Spotify.

Nous vous remercions de l'attention que vous porterez à la présente.

Meilleures salutations,

[REDACTED]

--

[REDACTED] I Director European Policy I Spotify
37 Square de Meeus
1000 Brussels
t: +[REDACTED]
e: [\[REDACTED\]@spotify.com](mailto:[REDACTED]@spotify.com) I www.spotify.com

This e-mail (including any attachments) may contain information that is confidential and/or privileged. It is intended only for the recipient(s). If you have reason to believe that you are not the intended recipient of this e-mail, please contact the sender immediately and delete the e-mail from your computer.

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[REDACTED] I Director European Policy I Spotify
37 Square de Meeus
1000 Brussels
t: +[REDACTED]
e: [REDACTED]@spotify.com I www.spotify.com
[REDACTED]

This e-mail (including any attachments) may contain information that is confidential and/or privileged. It is intended only for the recipient(s). If you have reason to believe that you are not the intended recipient of this e-mail, please contact the sender immediately and delete the e-mail from your computer.

Exhibit 19

20.4.2021 – VPJ Meeting with the CEO of TikTok Vanessa Pappas

The meeting between the Vice-President Věra Jourová and the CEO of TikTok Vanessa Pappas revolved around three topics, namely measures against disinformation, strengthening the responsibility of platforms and political advertising.

The responsibility of platforms was discussed in the light of Code of conduct on countering illegal hate speech online, the proposed Digital Services Act and the European Democracy Action Plan, including the revision of the Code of Practice on Disinformation. Vice-President Jourová welcomed TikTok's efforts on illegal hate speech online and on fighting COVID-19 related disinformation. CEO Pappas presented TikTok's Content Advisory Council as a way to increase transparency of the content moderation efforts while remaining at top of new challenges such as deepfakes, cyberbullying or teen health issues. Mrs Pappas also mentioned opening a European Public Transparency Centre in Dublin that should open up the details of content moderation process to public. Vice-President Jourová showed interest in these efforts and further emphasised the need to protect the freedom of expression.

The responsibility of the platforms was also discussed from the perspective of media literacy and mitigation of adverse effects consumption of these new media can have especially on teenagers. V. Pappas noted that TikTok is using its community to bring attention to media literacy, tech addiction and cyberbullying.

As regards political advertising, TikTok disallowed it before US elections in November 2020. On the question of the Vice-President whether it would be possible to run political advertising without profiling and targeting CEO Pappas referred to TikTok's advertising team.

Lastly, the Commission stressed the importance of going beyond the content moderation and address algorithms, as well as open up for research and oversight purposes.

Exhibit 20

BTO Meeting TikTok & Cabinet Breton

Webex Conference Call, 30 September 2021 – 15:00-15:45

Participants:

TikTok: [REDACTED]
 Cabinet Breton: [REDACTED]
 Note-taker: [REDACTED]

Discussion points:

TikTok:

On TikTok's business model:

- TikTok highlights that they are a new player in the market that has experienced a rapid growth in the last three years. They are currently expanding their operations in Europe and, in addition to having offices in several capitals across the EU (i.a. London, Rome), they are building a data centre and a new technology hub laboratory for tech development in Ireland.
- TikTok clarifies that they view themselves as an entertainment platform, not a social network. Their technology delivers content and have social features but it is not their primary activity.

On the DSA:

- TikTok welcomes the DSA proposal and harmonization across the EU. They would qualify as a very large online platform and they understand their responsibilities under the DSA. They are already taking actions on transparency concerning their business and accountability (e.g. reports and a community blog updating their policies)

On codes of conduct and Code of Practice on disinformation:

- They are active in the Code and support strong codes of conduct. They are currently conducting a major revision of their own code. In Europe, they are covering all languages with moderators. In this sense, they are also bringing forward more tools for users to allow them to configure their feed, choose content they want to see, and to increase transparency regarding the algorithm.
- TikTok runs a human review to check upon political ads. Their review policy covers both political ads from politicians and political parties. They are happy to share additional information

On the DMA:

- Thus far, TikTok does not think that it qualifies as gatekeeper but advocates for higher thresholds. TikTok also warned against unintended consequences and potential impact on innovation.

Exhibit 21

From: [Redacted] @tiktok.com]
Sent: 3/14/2022 1:37:06 PM
To: [Redacted] @ec.europa.eu]
Subject: Re: [External] heads up on today's meeting

Thanks [Redacted]

[Redacted]

From: [Redacted] @ec.europa.eu>
Date: Mon, Mar 14, 2022, 14:04
Subject: [External] heads up on today's meeting
To: [Redacted] @tiktok.com" [Redacted] @tiktok.com>

Dear [Redacted]

Hope you had a great weekend. I just wanted to drop you a quick message ahead of today's meeting on Ukraine.

Just to let you know, we will focus mostly on getting updates on two aspects:

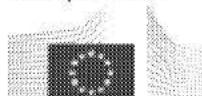
- any changes to terms of services relevant not to allow war propaganda and problematic content
- any relevant updates on demonetisation related to the war situation.

Thanks!

[Redacted]

[Redacted]

Policy Officer



European Commission

DG Communications Networks, Content and Technology

Unit I4 – Media convergence and Social Media

BU25 05/061

B-1049 Brussels/Belgium

[Redacted]

[Redacted] @ec.europa.eu

<https://digital-strategy.ec.europa.eu/en/policies/code-practice-disinformation>

Exhibit 22

Meeting conclusions

Participants	<p><u>Visitors' delegation:</u></p> <ul style="list-style-type: none"> • Daniel Georg EK, CEO of Spotify • [REDACTED], Global Head of Public Affairs • [REDACTED] • [REDACTED], Vice President, Global Government Relations • [REDACTED], Senior Director, European Policy • [REDACTED] <p><u>COM:</u></p> <ul style="list-style-type: none"> • Vice President Jourová • Daniel Braun, Deputy Head of Cabinet
Objective of the meeting	<ul style="list-style-type: none"> • Discuss the role and responsibilities of digital platforms within the context of the Digital Services Act (DSA). • Discuss the proposal for the Media Freedom Act, and the position of Spotify, as well as its obligation in the digital sphere. • How Spotify can contribute to the EU's work to promote a values-driven approach to Europe's digital economy, especially on AI.
Issues raised & follow-up	<p><i>On the digital economy and regulation</i></p> <ul style="list-style-type: none"> • Mr EK started by observing that since last speaking with the VP, Spotify has diversified the services it offers from music, to podcasts and audiobooks. This has led to a large growth of creators on the platform, from 1-2 million a few years ago to now close to 10 million, a trend accelerated by COVID-19. Asked if COVID-19 had increased creativity amongst creators, Mr EK confirmed this observation. This shift signalled that musicians are not the only creators on Spotify, which now houses various creators such as journalists and educators adding pressure on Spotify to provide new services and to innovate/modernise the platform, since these people are 'small business owners and entrepreneurs', according to Mr EK. • The digital economy will be fuelled by these individual entrepreneurs and Spotify is seeking to ease their ability to conduct business online. Mr EK mentioned that tools such as the DMA/DSA are very important to provide guidelines and are overall encouraging, though he stressed that implementation must be user-friendly to be effective. VP Jourová welcomed this optimism and stressed that leaders of global digital companies must understand the extreme responsibility they have. Mr EK fully agreed, pointing out that through this small business community of a creative middle-class Spotify seeks to make it clear that technology is a giver of jobs and not a taker of them. VP Jourová stated that the EU seeks to aid technological development and innovation, while ensuring the necessary investments, regulations and social safety nets to protect people and encourage innovation. • Since their last meeting in 2017, VP Jourová noted that the Commission has been engaging with stakeholders (public and private) about whether (and how) to regulate the internet, while prioritising the issue of freedom of speech. The EU seeks to engage

	<p>in the field of information space through various tools such as the DSA, the Code of Practice on Disinformation, the Political Advertising Regulation, and the Media Freedom Act (to be announced next week). The EU is careful to create rules that are consistent, feasible and easily applicable, enforceable, and comprehensible to the public. The goal of consultations with external stakeholders has been to develop definitions that are both contemporary and future-proof, avoiding legal uncertainty. VP Jourová then asked how Spotify was preparing for the DSA.</p> <ul style="list-style-type: none"> • Mr Ek responded that Spotify is currently reviewing the DSA and was not able to commit to something at this time. In principle, Spotify agrees with the DSA, though some minor issues remain with compliance. He added that Spotify is not against regulation, and signalled the danger of having too much power centred in the hands of very few companies and people, including himself. • Mr Ek also stated that fighting the antitrust case against Apple is one of Spotify's priorities, a point he discussed with EVP Vestager as well during their meeting. He expressed concern that Apple is trying, through their terms, to impose a 30% tax on the digital services ecosystem. • On platform responsibility, [REDACTED] (Spotify) added that Spotify has invested heavily in having a global team with 24-hour coverage in all languages. The priority is with harmful disinformation, and in such cases content must be removed. Concerning the war in Ukraine, Spotify has removed 17,000 pieces of content mostly originating from entities in Russia seeking to spread misinformation. Further, Spotify hired correspondents in the field to translate content in multiple language (including in Russia). Spotify has ceased operations in Russia due to the security risks and implications (i.e. suppression of information) for its employees. • On the issue of regulatory implementation, [REDACTED] stressed that Spotify is keen to work closely with the Commission to ensure it is user-friendly. VP Jourová stressed that consumer protection is difficult to attain fully top-down, as it requires citizens who are aware and diligent when working in the digital space. [REDACTED] (Spotify) seconded the VP's point, adding that people should not abuse explicit consent provisions to drain more data and rights from consumers than they should. [REDACTED] (Spotify) remarked that Spotify is in touch with DG CNECT to understand how to better implement and address these questions. • VP Jourová's tangible points of follow up between the Commission and Spotify were; encouraging joining the Code of Practice on Disinformation; encouraging participation in the European Diversity Month next May; and participating in the consultation of the fitness check of EU consumer law on digital fairness. <p><i>On defence</i></p> <ul style="list-style-type: none"> • VP Jourová stressed that there were clear signs (i.e. annexation of Crimea in 2014) on Russia's war of aggression against Ukraine. During the early phase of the invasion, in the digital sphere the EU sought to manage Russia's war propaganda in Europe; promote and protect journalists on the field reporting on the war; protect Russian journalists in exile. In these efforts, the close collaboration and support of digital companies is necessary, to which Mr Ek agreed
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	<p>fully.</p> <ul style="list-style-type: none"> • Mr Ek then asked about foreign governments that do not share our values leveraging media and digital technology to their advantage, naming Russia and China. He gave the example of the Chinese platform TikTok, which is extremely popular amongst young Europeans. VP Jourová recalled that China is a WTO member, meaning the EU cannot adopt protectionist policies. However, the proliferation of various platforms was an additional signal for the EU to introduce legally binding rules for digital operation on European territory, especially for those from places with different notions of privacy and human dignity than us. • The VP added that the Media Freedom Act is a response to the interferences in some places in Europe. The EU's aims are to safeguard free media and ensure their plurality. Specifically, VP Jourová cited a specific chapter of the Media Freedom Act that obliges digital platforms to give <i>ex ante</i> (as opposed to <i>ex post</i>) announcements to recognised media that are fulfilling standards that they would remove content, thus bringing both transparency and allowing media to defend themselves in case of disagreement about the breach. • Mr Ek noted that they are receiving a lot of requests from governments to bring down content. Moreover, Mr Ek pointed out that parodies are a big source of contention especially when the satire targets governments; the VP replied that such services should continue as they are protected by numerous EU decisions and court cases. • Mr Ek shared his intention to move into the field of AI and defence. Specifically, through Mr Ek's venture capital company in Europe, the aim is to enter industries that will be impactful and where others may not want to enter. Mr Ek's motivations are to build up the EU's deterrent, adding that Ukraine is gaining an edge in the war due to technological superiority, although VP Jourová cautioned that sometimes even this is not enough in the face of the brutality of war.
Note taker	Nikolaos Theodosiadis (SG.A.4)
Copies	P. Leardini, E. Werner, J. Watson, M. Wimmer, E. Roller, W. Sleath, M. Karnitsching, C. Becher, J. Mousnier, JC. Van Eeckhaute, D. De Ojeda Garcia-Pardo, L. Buka, I. Valero, S. Raj, O. Valceanu, D. Iliev, unit SG.A.4, Eleanor Thompson (CNECT), Evangelia Deligiorgi (DEFIS), Natalia Burlacu (JUST)

Exhibit 23

From: [Redacted] [Redacted]@tiktok.com]
Sent: 11/9/2022 6:45:25 PM
To: [Redacted] [Redacted]@ec.europa.eu
Cc: [Redacted] [Redacted]@ec.europa.eu; [Redacted] CNECT-F2@ec.europa.eu; [Redacted] [Redacted]@ec.europa.eu; [Redacted] [Redacted]@ec.europa.eu
Subject: Re: [External] RE: Pre-designation DSA meeting in Brussels / TikTok - 15th

No problem -

[Redacted] [Redacted]@tiktok.com
[Redacted] [Redacted]@tiktok.com
[Redacted] [Redacted]@tiktok.com
[Redacted] [Redacted]@tiktok.com

Kind regards

[Redacted]

From: [Redacted] [Redacted]@cc.europa.eu>
Date: Wed, Nov 9, 2022, 7:29 PM
Subject: [External] RE: Pre-designation DSA meeting in Brussels / TikTok - 15th
To: "[Redacted] [Redacted]@tiktok.com">
Cc: "[Redacted] [Redacted]@cc.europa.eu", "CNECT-F2@cc.europa.eu"<CNECT-
[Redacted] [Redacted]@cc.europa.eu>, [Redacted] [Redacted]@cc.europa.eu>, [Redacted] [Redacted]@cc.europa.eu>, [Redacted] [Redacted]@cc.europa.eu>

Dear [Redacted]

Many thanks for the below email.

In order to enter our premises, I would be grateful if you could send me the name, firstname and email address of the participant.

Kind regards,

[Redacted]
[Redacted]

[Redacted]
Sent: Wednesday, November 9, 2022 2:37 PM
To: [Redacted] [Redacted]@ec.europa.eu>
Cc: [Redacted] [Redacted]@ec.europa.eu>; [Redacted] [Redacted]@ec.europa.eu>; [Redacted] [Redacted]@ec.europa.eu>; [Redacted] [Redacted]@tiktok.com>
[Redacted] [Redacted]@ec.europa.eu>; [Redacted] [Redacted]@ec.europa.eu>; [Redacted] [Redacted]@ec.europa.eu>; [Redacted] [Redacted]@tiktok.com>
Subject: Pre-designation DSA meeting in Brussels / TikTok - 15th

Dear [Redacted]

Good to catch you yesterday by phone and looking forward to your further feedback on the proposed meeting agenda below and other details (Commission attendees, exact address etc). Will we need to gather registration details on our side?

Thank you and best regards

[Redacted]

From: "[Redacted] tiktok.com"

Date: Thu, Nov 3, 2022, 11:49 AM

Subject: Pre-designation DSA meeting in Brussels / TikTok - 15th

To: [Redacted] ec.europa.eu, [Redacted]
[Redacted] ec.europa.eu, [Redacted] ec.europa.eu
Cc: "[Redacted] ec.europa.eu", [Redacted] @tiktok.com

Dear [Redacted] and colleagues

By way of an agenda for our meeting on 15th, and in order to allow us to prepare, we would propose the following agenda:

1. Services overview / description
2. Timelines (confirming our current view on this)
3. VLOP designation process (addressing methodology)
4. Risk assessment (top line approach/ideas - we will obviously discuss further in future meetings)
5. Agree cadence of future meetings and suggested topics going forward

How does this sound to you, is there anything else you would expect to see?

Also, would it be possible to get a list of attendees on your side? Based on the agenda above, we will likely be 3 at least [Redacted] (both were part of the Dublin meeting) from our Legal team, and myself.

Looking forward to your reply.

Many thanks and kind regards

[Redacted]

From: "[Redacted] tiktok.com"

Date: Wed, Oct 26, 2022, 10:39 PM

Subject: Pre-designation DSA meeting in Brussels / TikTok

To: "Redacted" <ec.europa.eu>, [Redacted]
[Redacted] <ec.europa.eu>, [Redacted] <ec.europa.eu>
Cc: [Redacted] <ec.europa.eu>, "Redacted" <tiktok.com>

Dear [Redacted]

I am just following up on the email below and in particular the question regarding the agenda / format for our meeting on 15th. We have a team meeting tomorrow (Thursday) to prepare and so any details that you have will be helpful.

Thank you and kind regards

[Redacted]

From: "Redacted" <tiktok.com>

Date: Tue, Oct 18, 1:00 PM

Subject: Fw: [External] RE: Date for pre-designation DSA meeting in Brussels

To: "Redacted" <ec.europa.eu>, [Redacted]
[Redacted] <ec.europa.eu>, "Redacted" <tiktok.com>, [Redacted]
[Redacted] <ec.europa.eu>

Dear [Redacted]

With a view to our meeting next month, can you please let us know if there is a particular format or agenda that we should follow when preparing?

We understood from our discussions in Dublin with [Redacted] that for the first meeting, there would be a focus on service definitions/numbers and perhaps a preliminary look at section 5 DSA? And that you would like to see some documentation in advance?

Also, I see Teams mentioned in the calendar invitation and it is possible that one of our team will have to join virtually - just confirming that that facility will be in place?

Many thanks,

Kind regards

[Redacted]

----- Forwarded message -----

From: [Redacted] <ec.europa.eu>

Date: Fri, Oct 7, 2022, 9:28 AM

Subject: [External] RE: Date for pre-designation DSA meeting in Brussels

To: "Redacted" <tiktok.com>

Cc: [Redacted] [Redacted] <ec.europa.eu> [Redacted]
[Redacted] <ec.europa.eu>, [Redacted] [Redacted]
[Redacted] <ec.europa.eu>, [Redacted] [Redacted] <ec.europa.eu>

Dear [Redacted]

Many thanks for your message. We can hold 15 November 11-12 for this meeting, the rest of the day being already full. [Redacted] here are in the lead for the pre-designation / designation process and can advise on additional preparations, and [Redacted] on the logistics of the meeting, which will take place in our new offices on rue de la Loi, normally.

[Redacted]

From: [Redacted] <tiktok.com>
Sent: Wednesday, October 5, 2022 3:03 PM
To: [Redacted] <ec.europa.eu>; [Redacted] [Redacted]
<Redacted> <ec.europa.eu>; [Redacted] <tiktok.com>
Subject: Date for pre-designation DSA meeting in Brussels

Dear [Redacted]

It was great to have you meet the TikTok team in Dublin last week, and I hope that the rest of your trip went well.

I am following up on the date of our pre-designation workshop in Brussels. Due to various commitments among our team, we would have a preference for **15 November**, if this date was open on your side?

Separately, we have today received notice of the high level event in CZ on disinformation so thank you for the heads up on that.

Many thanks and kind regards

[Redacted]

----- Forwarded message -----

From: [Redacted] <tiktok.com>
Date: Fri, Sep 23, 2022, 6:01 PM
Subject: Visit Dublin on the 29th September + date for pre-designation DSA meeting in Brussels
To: [Redacted] <ec.europa.eu>; [Redacted]
[Redacted] <ec.europa.eu>; [Redacted] <tiktok.com>
Cc: "CNECT-F2@ec.europa.eu" <CNECT-F2@ec.europa.eu>, [Redacted]
[Redacted] <ec.europa.eu>

Apologies, a change in address due to meeting room availability - the meeting will now take place in our second WeWork building, Iveagh Court, Dublin 2. This building is just beside the other one in fact. Please ask for [Redacted] on arrival.

Secondly and in relation to the more extensive 'pre-designation' meeting on the DSA, to take place in Brussels, we would like to ask if this could take place on either **14 or 15 November**, ideally early/mid afternoon timeframe? We would have a team travel over from London [Redacted] (will also attend that one) and I will join

as well. We have looked at October but between business travel, staff leave and mandatory jury duty (!), we can't see an earlier week that suits.

Many thanks,

Kind regards

Redacted

From: [Redacted] <ec.europa.eu>

Date: Thu, Sep 22, 2022, 6:37 PM

Subject: RE: [External] RE: Visit Dublin on the 29th September

To: "Redacted" <tiktok.com>

Cc: "Redacted" <ec.europa.eu>, "CNECT-F2@ec.europa.eu"<CNECT-ec.europa.eu>, "Redacted" <ec.europa.eu>

Dear [Redacted]

Many thanks for confirming the meeting!

I will be joining the meeting, together with [Redacted]

Have a great evening.

Best,

Redacted



European Commission

Directorate-General for Communications Networks, Content and Technology

Unit F.2 Digital Services

Brussels/Belgium

[Redacted]

[Redacted] <ec.europa.eu>

From: [Redacted] <tiktok.com>

Sent: Thursday, September 22, 2022 6:30 PM

To: [Redacted] ec.europa.eu; [Redacted]

<Redacted tiktok.com>

Cc: [Redacted] ec.europa.eu; [Redacted]

[Redacted] cc.europa.eu; CNECT F2 <CNECT-F2@ec.europa.eu>

Subject: Re: [External] RE: Visit Dublin on the 29th September

Also, can you confirm how many you will be on your side and names?

And for your planning purposes, note that we are currently located in the WeWork office on 5 Harcourt Street, Dublin 2 (while we wait to get into our new offices).

Thank you!

[Redacted]

From: [Redacted] tiktok.com>

Date: Thu, Sep 22, 2022, 5:52 PM

Subject: Re: [External] RE: Visit Dublin on the 29th September

To: [Redacted] ec.europa.eu; [Redacted]

."[Redacted tiktok.com](https://tiktok.com)>

Cc: [Redacted] ec.europa.eu; [Redacted]

[Redacted] cc.europa.eu; "CNECT-F2@ec.europa.eu"<CNECT-F2@ec.europa.eu>

[Redacted]

We would take the 1.30pm slot on 21st if still free. It would allow our [Redacted] to travel in from London and she would take the meeting with [Redacted] who is a [Redacted] [Redacted] based in Dublin. I hope to join remotely.

Kind regards

[Redacted]

From: [Redacted] ec.europa.eu>

Date: Thu, Sep 22, 2:00 PM

Subject: [External] RE: Visit Dublin on the 29th September

To: [Redacted] tiktok.com>

Cc: [Redacted] ec.europa.eu; [Redacted]

[Redacted] cc.europa.eu; "CNECT-F2@ec.europa.eu"<CNECT-F2@ec.europa.eu>

Dear [Redacted]

Great to read that 😊

Unfortunately the initially proposed slot is no more available.

We can propose the following slots:

- 29th October, from 13.30 to 14.30 (Dublin time) or after 17.45
- 30th October, from 16.30 to 17.30

May I please ask you to confirm as soon as possible as we need to organise other meetings.

Kind regards,

Redacted

Redacted

Redacted < Redacted ec.europa.eu>

Sent: Thursday, September 22, 2022 12:56 PM

To: Redacted @tiktok.com>

Cc: Redacted ec.europa.eu>; Redacted

< Redacted ec.europa.eu>

Subject: Re: Visit Dublin on the 29th September

Excellent - please keep Redacted in the loop to align the slots on the day

On 22 Sep 2022, at 12:25, Redacted @tiktok.com> wrote:

Hi Redacted

Apologies for the delay, still working on 29th but hope we can put up a couple of folks - hope to confirm later today.

Redacted

From: Redacted tiktok.com>

Date: Tue, Sep 20, 2022, 5:37 PM

Subject: Re: RE: RE: RE: [External] Visit Dublin on the 29th September

To: " Redacted ec.europa.eu>

No problem.

From: Redacted ec.europa.eu>

Date: Tue, Sep 20, 2022, 5:20 PM

Subject: RE: RE: RE: [External] Visit Dublin on the 29th September

To: Redacted tiktok.com>

My meeting is running late – can we make it at 17:45?

From: Redacted tiktok.com>

Sent: Tuesday, September 20, 2022 2:59 PM

To: Redacted ec.europa.eu>

Subject: Re: RE: RE: [External] Visit Dublin on the 29th September

Yes, thanks, let's do that. Also good to know what you would be interested to cover in our meeting so I can ensure that we have the right team coming over. I will give you a call.

From: **Redacted** ec.europa.eu
Date: Tue, Sep 20, 2022, 2:53 PM
Subject: RE: RE: [External] Visit Dublin on the 29th September
To: **Redacted** tiktok.com

PS – if easier, let's speak on the phone, I can speak after 17:30 on 0460751207

From: **Redacted**
Sent: Tuesday, September 20, 2022 2:42 PM
To: **Redacted** tiktok.com

Cc: **Redacted** ec.europa.eu **Redacted**
<**Redacted** ec.europa.eu>; CNECT F2 <CNECT-F2@ec.europa.eu>

Subject: RE: RE: [External] Visit Dublin on the 29th September

Dear **Redacted** many thanks. I realise this was short notice.

One question: I seem to recall that TikTok opened a transparency centre in Dublin, but I'm not sure if this is correct information. We would also be interested in any additional information on how TikTok deals with transparency and content moderation more broadly, in case there are colleagues available on this topic.

We can indeed schedule a DSA-focused discussion here in Brussels.

Let me know if there are some possibilities in this regard, even in a smaller setting – just to use the opportunity on the visit.

Redacted
From: **Redacted** tiktok.com

Sent: Tuesday, September 20, 2022 1:11 PM

To: **Redacted** ec.europa.eu **Redacted**
<**Redacted** tiktok.com>

Cc: **Redacted** ec.europa.eu **Redacted**
<**Redacted** ec.europa.eu>; CNECT F2 <CNECT-F2@ec.europa.eu>

Subject: Re: RE: [External] Visit Dublin on the 29th September

Dear **Redacted**

Apologies for the delay, our U.K office was closed yesterday and I needed to sync with colleagues there. But a quick message now to let you know that next week does not look possible unfortunately as a number of relevant people are not available.

However, we can come to you here in Brussels and the team is now checking schedules for next month - I will come back to you soon with date proposals.

Apologies that we could not make next week work but I wanted to let you know asap so you can free up the slot.

Kind regards

Redacted

From: Redacted <ec.europa.eu>
Date: Mon, Sep 19, 3:00 PM
Subject: RE: [External] Visit Dublin on the 29th September
To: 'Redacted' <tiktok.com>
Cc: 'Redacted' <ec.europa.eu>, 'Redacted'
<Redacted> <cc.europa.eu>, "CNECT-F2@cc.europa.eu" <CNECT-F2@ec.europa.eu>

Hi Redacted

Sure – Brussels is always an option, and one shouldn't exclude the other, of course!

We kept some time free on Thursday 29/9 in Dublin to meet the teams “on the ground”, but I'll let you judge what is most useful, as you know best which teams should be involved. Happy also to meet the Dublin people with the London people joining remotely, to limit the DSA's carbon footprint, as you see fit.

I appreciate it's a little short notice, but hope something can work out.

Redacted

From: Redacted <tiktok.com>
Sent: Monday, September 19, 2022 3:01 PM
To: Redacted <ec.europa.eu>
Cc: Redacted <ec.europa.eu>; Redacted
<Redacted> <cc.europa.eu>; CNECT F2 <CNECT-F2@cc.europa.eu>
Subject: Re: [External] Visit Dublin on the 29th September

Dear Redacted

Nice to hear from you. I was in fact just discussing with my colleagues recently whether we shouldn't reach out for a meeting soon, to discuss DSA implementation.

Let me check in with our team. Some of our lead lawyers working on the DSA are based in London though. In the event that we could not get the team together for 29th in Dublin, would a meeting in Brussels work as Plan B? Just to know in advance....

Kind regards

Redacted

From: Redacted <ec.europa.eu>
Date: Mon, Sep 19, 2022, 2:39 PM
Subject: [External] Visit Dublin on the 29th September
To: 'Redacted' <tiktok.com> <Redacted> <tiktok.com>
Cc: 'Redacted' <ec.europa.eu>, 'Redacted'
<Redacted> <cc.europa.eu>, "CNECT-F2@cc.europa.eu" <CNECT-F2@ec.europa.eu>
Dear Redacted

I hope this finds you well.

As part of our preparations for the enforcement of the Digital Services Act, I will be in Dublin on the 29/09 and 30/09 together with my colleague [REDACTED] **Redacted** We would like to use the opportunity to discuss how TikTok is preparing for the DSA with your colleagues in the HQ. On the 29/9 our schedules are still relatively free, and we would be grateful for your help in organising such meeting. We will land in Dublin at 10: 30 so we would suggest scheduling the meeting at 11.30.

Would that work on your side?

Many thanks and kind regards,

Redacted



European Commission

Directorate-General for Communications Networks, Content and Technology
Digital Services and Platforms

Exhibit 24

From: [Redacted] @tiktok.com]
Sent: 1/4/2023 9:01:35 AM
To: [Redacted] @ec.europa.eu]
CC: [Redacted] @ec.europa.eu]
Subject: Re: [External] RE: Virtual meeting with Commissioner Breton, 19th Jan

Dear [Redacted]

Many thanks - fine on both points.

Kind regards

[Redacted]

From: [Redacted] @ec.europa.eu>
Date: Wed, Jan 4, 9:00 AM
Subject: [External] RE: Virtual meeting with Commissioner Breton, 19th Jan
To: [Redacted] @tiktok.com>
Cc: [Redacted] @ec.europa.eu>

Dear [Redacted]

Happy New Year!

Thank you for your confirmation. We blocked for this virtual meeting 30 minutes. We hope that will be fine for you?

For the connection – we will send you the Webex link, if it is suitable for you?

Best,

[Redacted]

From: [Redacted] @tiktok.com>
Sent: Tuesday, January 3, 2023 6:41 PM
To: [Redacted] @ec.europa.eu>

Cc:

Redacted

@ec.europa.eu>

Redacted

Redacted

@tiktok.com>

Subject: Virtual meeting with Commissioner Breton, 19th Jan

Dear

Redacted

Happy new year to you both.

And I am pleased to let you know that we have been able to make some adjustments to Mr Chew's travel agenda, and we can now confirm the (virtual) meeting date and time of **19th January at 16:00**.

Please can you let us know how long we will have for the meeting? And would you like to send us the dial in details, according to your preferred platform?

Attendees on our side will be:

Mr Shou Zi Chew, CEO Redacted @bytedance.com

Redacted VP Public Policy, Europe Redacted @tiktok.com

Redacted Director of Public Policy Redacted @tiktok.com

Many thanks and kind regards

Redacted

From: Redacted @tiktok.com>

Date: Tue, Dec 20, 2022, 16:17

Subject: Re: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: Redacted @ec.europa.eu>

Cc: Redacted @ec.europa.eu> Redacted
Redacted @tiktok.com>

Apologies for the delay in confirming but Mr Chews's team has let me know that his agenda for Davos week is still very much in flux, and that includes his possible return travel on 19th. I will come back to you early in the new year to confirm.

Many thanks, and I take the opportunity also to wish you a happy Christmas.

Redacted

From: **Redacted** @ec.europa.eu

Date: Mon, Dec 19, 12:00 PM

Subject: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** @tiktok.com

Cc: **Redacted** @ec.europa.eu

Well-noted, thank you for your swift reply

Redacted

From: **Redacted** @tiktok.com

Sent: Monday, December 19, 2022 12:14 PM

To: **Redacted** @ec.europa.eu

Cc: **Redacted** @ec.europa.eu, **Redacted** @tiktok.com

Subject: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Thanks **Redacted**

We would propose to provide a brief overview of our company and our plans for 2023, given that this would have been a first meeting between Mr Chew and the Commissioner. We would also welcome the chance to discuss our DSA implementation plans as TikTok is expected to be classified as a 'VLOP' (Very Large Online Platform) by the Commission early next year. We would also propose to discuss our commitments and work under the EU Code of Practice on Disinformation.

Kind regards

Redacted

From: **Redacted** [@cc.europa.eu>](mailto:@cc.europa.eu)

Date: Mon, Dec 19, 2022, 12:03 PM

Subject: RE: RE: RE: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Cc: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Dear **Redacted**

In the meantime, I would be grateful if you could indicate the topics Mr Chew would like to address during the discussion.

Best regards,

Redacted

From: **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Sent: Tuesday, December 13, 2022 4:04 PM

To: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu), **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Cc: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Subject: Re: RE: RE: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Ok. Let me come back to you about 19th then as Mr Chew will be in Davos that week.

We are due to go through his schedule for Brussels next Monday, so we can check then.

Kind regards

Redacted

From: **Redacted** [@cc.europa.eu>](mailto:@cc.europa.eu)

Date: Tue, Dec 13, 2022, 3:59 PM

Subject: RE: RE: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Cc: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Unfortunately no – the Commissioner will not be in Brussels.

From: **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Sent: Tuesday, December 13, 2022 3:59 PM

To: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Cc: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Subject: Re: RE: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Dear **Redacted**

Many thanks for the update.

That's a shame. Is there anything possible at all on 10th?

Redacted

From: **Redacted** [@cc.europa.eu>](mailto:@cc.europa.eu)

Date: Tue, Dec 13, 2022, 3:56 PM

Subject: RE: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** @tiktok.com

Cc: **Redacted** @ec.europa.eu

Dear **Redacted**

I hope this message finds you well?

We have just learned that the College meeting on Wednesday 11/01 is now exceptionally scheduled for the whole day.

So, I am afraid the meeting in person on that day will no longer be possible.

P.S. The online option on Thu. 19/01 at 16h00 Brussels time is still duly noted in the agenda.

Thank you.

Best,

Redacted

From: **Redacted** @tiktok.com

Sent: Monday, November 21, 2022 12:58 PM

To: **Redacted** @ec.europa.eu

Cc: **Redacted** @ec.europa.eu; **Redacted** @tiktok.com

Subject: Re: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Understood, thank you. We keep in touch.

From: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Date: Mon, Nov 21, 2022, 12:56 PM

Subject: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Cc: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Ok – I will book 18h15

For an earlier slot – I will tentatively block 13h30-14h00 just after College meeting – but this slot I will only be able to confirm at the very last moment.

Best,

Redacted

From: **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Sent: Monday, November 21, 2022 12:51 PM

To: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu); **Redacted**
Redacted [@tiktok.com>](mailto:@tiktok.com)

Cc: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Subject: Re: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Thanks **Redacted** - let's hold that time in that case. I am not 100% sure yet what date/time our CEO plans to leave Brussels/Belgium after his engagements but we will do our utmost to accommodate that time. He is very keen to meet with the Commissioner of course.

And if an earlier time on 11th becomes available, would you kindly let me know?

Thank you for your help.

Redacted

From: **Redacted** <@ec.europa.eu>

Date: Mon, Nov 21, 2022, 12:39 PM

Subject: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** <@tiktok.com>

Cc: **Redacted** <@ec.europa.eu>

Dear **Redacted**

Thank you for your message.

For the time being we can only offer you Wed. 11/01 at 18h15-18h45.

On Tue 10/01 the Commissioner will be on mission.

Looking forward to hearing from you.

Best,

Redacted

From: **Redacted** <@tiktok.com>

Sent: Monday, November 21, 2022 12:31 PM

To: **Redacted** <@ec.europa.eu>; **Redacted** <@tiktok.com>

Cc: **Redacted** <@ec.europa.eu>

Subject: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Dear **Redacted**

I hope this email finds you well.

I wanted to check in again to see if you might already have a view of Commissioner Breton's meeting availability in January (10th/11th).

For the moment, our CEO will be in Berlaymont for meetings with EVP Vestager and VP Jourova on 10th January, at 10 and 11am respectively. He will also then be in Berlaymont for a meeting with Commissioner Reynders on 11th at 2pm. It would of course be ideal to arrange something around those times, eg afternoon of 11th. But of course, it depends on Commissioner Breton's availability.

Many thanks for any updates, and kind regards

Redacted

From: **Redacted** <@tiktok.com>

Date: Fri, Oct 7, 2022, 5:15 PM

Subject:Re: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** @ec.europa.eu **Redacted** @tiktok.com
Cc: **Redacted** @ec.europa.eu

Many thanks **Redacted** let's do that and we can check back closer to the time. It would certainly be preferable to meet in person with Commissioner Breton if at all possible of course.

For now, we have meetings confirmed with EVP Vestager and VP Jourová on morning of 10th January and the rest is open.

Kind regards

Redacted
From: **Redacted** @ec.europa.eu

Date: Fri, Oct 7, 1:00 PM

Subject: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** @tiktok.com
Cc: **Redacted** @ec.europa.eu

Dear **Redacted**

Thank you your message.

I will pencil the meeting on 10/11 January in the agenda (and keep of course the virtual one on 19th) but I will only be able to confirm it once we have a full picture for January.

Would it be fine for you?

Best,

Redacted
From: **Redacted** @tiktok.com

Sent: Friday, October 7, 2022 1:05 PM

To: **Redacted** @ec.europa.eu
Cc: **Redacted** @ec.europa.eu; **Redacted** @tiktok.com

Subject: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Dear **Redacted**

We heard this week from the Executive Vice-President's office that there will now be a meeting of the College of Commissioners in Sweden on 13th January, which throws our plans up in the air again.

We are now exploring **10/11 January** for our CEO visit - does Commissioner Breton have any availability on those dates by any chance, ideally in person and to replace the virtual meeting we had planned for 19th?

Many thanks and kind regards

Redacted

From: **Redacted** @tiktok.com

Date: Mon, Sep 26, 2022, 1:43 PM

Subject: Re: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** @ec.europa.eu

Cc: **Redacted** @cc.europa.eu **Redacted** @tiktok.com

Many thanks **Redacted**. Let's indeed book that slot.

Kind regards

Redacted

From: **Redacted** @ec.europa.eu

Date: Mon, Sep 26, 2022, 1:31 PM

Subject: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** @tiktok.com

Cc: **Redacted** @ec.europa.eu

Dear **Redacted**,

For the time being, I can only tentatively book the agenda for a virtual meeting on Thu. 19/01 in the afternoon.

Would 16h00 be fine on your side?

Thank you.

Best,

Redacted

From: **Redacted** @tiktok.com

Sent: Monday, September 26, 2022 11:29 AM

To: **Redacted** @ec.europa.eu **Redacted** @tiktok.com

Cc: **Redacted** @ec.europa.eu

Subject: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Dear **Redacted**

I am reverting on the dates for our CEO's visit to Brussels.

In the end, Shou will come to Brussels on 12/13 January, en route to Davos. You mentioned that Commissioner Breton would be on a mission on 12th and 13th January - would there be an opportunity for a virtual meeting on either of those dates by any chance? We have a meeting with EVP Vestager and VP Jourova on the morning of 13th but we are otherwise available so far. And if not, you mentioned the afternoon of 19th January as being an option - could we possibly hold a virtual meeting then?

Our strong preference would of course have been to have an in-person meeting with Commissioner Breton but it may not be possible for this visit unfortunately.

Thank you,

Kind regards

Redacted

From: **Redacted** @ec.europa.eu

Date: Tue, Sep 20, 2022, 11:45 AM

Subject: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** @tiktok.com

Cc: **Redacted** @ec.europa.eu

12-13/01 we plan a mission

18-19/01 a plenary session in Strasbourg so we can only pencil the meeting on Thu. 19/01 in the afternoon, if is acceptable on your side?

From: **Redacted** @tiktok.com

Sent: Tuesday, September 20, 2022 11:36 AM

To: **Redacted** @ec.europa.eu

Cc: **Redacted** @ec.europa.eu

Subject: Re: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Understood.

I think we may look to do something in Brussels in and around the Davos dates in that case, as our CEO will travel to Europe for that event - would something like 12/13 or 18/19 January work for example?

Kind regards

Redacted

From: **Redacted** @ec.europa.eu

Date: Tue, Sep 20, 2022, 11:07 AM

Subject: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** @tiktok.com

Cc: **Redacted** @ec.europa.eu

Dear **Redacted**

For the time being we plan a mission – so difficult for us to confirm it now.

Have a nice day,

Redacted

From: **Redacted** @tiktok.com

Sent: Tuesday, September 20, 2022 10:51 AM

To: **Redacted** @tiktok.com **Redacted** @ec.europa.eu

Cc: **Redacted** @ec.europa.eu

Subject: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Dear **Redacted**

The only other dates that look to be do-able on our side would be 28 and 29 November - how do they look to you?

We will also check them with other Commissioners but if they aren't possible, we may then move to January.

Many thanks for your help,

Redacted

From: **Redacted** @tiktok.com

Date: Mon, Sep 19, 2022, 9:26 AM

Subject: Re: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** @ec.europa.eu **Redacted** @tiktok.com

Cc: **Redacted** @ec.europa.eu

Good morning **Redacted**

Unfortunately neither of those dates are working out for other Commissioners. We are checking schedules again for early November, otherwise we may need to move to January.

Have a good start to the week, and I will be in touch again soon.

Kind regards

Redacted

From: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Date: Thu, Sep 15, 6:00 PM

Subject: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Cc: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Dear **Redacted**

Monday 5/12 in the afternoon at around 15h00 will be fine; on 6/12 we have the TTE Council.

Best,

Redacted

From: **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Sent: Thursday, September 15, 2022 5:13 PM

To: **Redacted** [@tiktok.com>; **Redacted** \[@ec.europa.eu>\]\(mailto:@ec.europa.eu\)](mailto:@tiktok.com)

Cc: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Subject: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Dear **Redacted**

Would 5-6 December work any better?

Redacted

From: **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Date: Tue, Sep 13, 2022, 11:11 AM

Subject: Re: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** [@ec.europa.eu> **Redacted** \[@tiktok.com>\]\(mailto:@tiktok.com\)](mailto:@ec.europa.eu)

Cc: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Thanks for letting me know so quickly, **Redacted**. We will go back to the drawing board as indeed the new dates are also proving difficult for another Commissioner.

I will revert with some new options shortly.

Kind regards

Redacted

From: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Date: Tue, Sep 13, 2022, 9:15 AM

Subject: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Cc: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Dear **Redacted**

Thank for your message – we understand.

But I am afraid these dates are difficult – we have the COMPET Council on 1st and 2nd December.

Is there another possible date?

Thank you.

Kind regards,

Redacted

From: **Redacted** [@tiktok.com>](mailto:@tiktok.com)

Sent: Monday, September 12, 2022 6:26 PM

To: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu) **Redacted**
Redacted [@tiktok.com>](mailto:@tiktok.com)

Cc: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Subject: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Dear **Redacted**

I hope you are well.

I have, in the last day, been informed that our CEO's travel schedule has had to be adjusted due to an unexpected conflict.

He is now planning to come to Brussels on 1st (afternoon) and 2nd December. Would either of these dates work for Commissioner Breton?

My apologies for this change and the inconvenience of checking twice on availability.

Kind regards

Redacted

From: **Redacted** [@ec.europa.eu>](mailto:@ec.europa.eu)

Date: Thu, Sep 1, 2022, 10:04 AM

Subject: RE: RE: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** @tiktok.com

Cc: **Redacted** @ec.europa.eu

Thank you – duly noted.

Best,

Redacted

From: **Redacted** @tiktok.com

Sent: Thursday, September 1, 2022 9:57 AM

To: **Redacted** @ec.europa.eu; **Redacted**
Redacted @tiktok.com

Cc: **Redacted** @ec.europa.eu

Subject: Re: RE: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Good morning

Thank you very much for the flexibility. If we can go with **4pm on 17th November**, that would be great.

Let's keep in touch and closer to the time, I can send you a biography and arrange other details.

Kind regards

Redacted

From: **Redacted** @ec.europa.eu

Date: Thu, Sep 1, 2022, 9:25 AM

Subject: RE: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: **Redacted** @tiktok.com

Cc: **Redacted** @ec.europa.eu

Good morning,

We have the possibilities from 15h00 until 17h00, if more convenient for you?

Best,

Redacted

From: **Redacted** @tiktok.com

Sent: Wednesday, August 31, 2022 6:09 PM

To: Redacted @ec.europa.eu

Cc: Redacted @ec.europa.eu

Subject: Re: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Thank you, Redacted And is 3.30pm the latest time you can go on 17th?

Kind regards

Redacted

From: Redacted @ec.europa.eu

Date: Wed, Aug 31, 2022, 5:01 PM

Subject: RE: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: Redacted @tiktok.com

Cc: Redacted @ec.europa.eu

Dear Redacted

For the time being, our preference goes to Thursday 17/11 in the afternoon.

I hope this would be convenient for you ?

Best,

Redacted

From: Redacted @tiktok.com

Sent: Wednesday, August 31, 2022 4:51 PM

To: Redacted @ec.europa.eu; Redacted @tiktok.com

Cc: Redacted @ec.europa.eu

Subject: Re: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Dear Ms Redacted

Thank you very much for this positive reply.

Would Commissioner Breton have any availability on Friday 18th by any chance, or is Thursday afternoon preferable?

We are scheduling a number of other events and meetings, so I am just trying to work out timings.

Thank you and kind regards

Redacted

From: Redacted <@ec.europa.eu>

Date: Tue, Aug 30, 2022, 4:07 PM

Subject: [External] RE: TikTok CEO visit to Brussels / meeting with Commissioner Breton

To: Redacted <@tiktok.com>

Cc: Redacted <@ec.europa.eu>

Dear Ms Redacted

Thank you for your message – we will be happy to set up the meeting between Mr Shou Zi Chew and Commissioner Breton on Thursday 17 November at 15h30, if it is convenient for?

Thank you.

Kind regards,

Redacted

Redacted

BERL 10/250

Rue de la Loi 200

1049 Brussels/Belgium

Redacted

Redacted <@ec.europa.eu>

From: Redacted <@tiktok.com>

Sent: Thursday, August 4, 2022 11:20 AM

To: CAB BRETON CONTACT <CAB-BRETON-CONTACT@ec.europa.eu>

Cc: Redacted <@ec.europa.eu>, Redacted <@ec.europa.eu>

Subject: TikTok CEO visit to Brussels / meeting with Commissioner Breton

Dear Cabinet members,

TikTok's CEO, Mr Shou Zi Chew, is planning a visit to Brussels later this year and he would be very keen to meet with Commissioner Breton, if the Commissioner would also be interested and available.

For now, we are exploring the dates of **17-18 November** for the visit. We would be grateful if you might let us know if such dates could, in principle, work for Commissioner Breton.

Many thanks,

Kind regards

--

Redacted

Tel Redacted

Email Redacted

Exhibit 25

Redacted

From: Redacted
Sent: lundi 6 mars 2023 16:24
To: Redacted
Subject: FW: Read out of the meeting between VP Jourova and TikTok CEO

From: Redacted @ec.europa.eu
Sent: Tuesday, January 10, 2023 3:27 PM
Cc: Redacted @ec.europa.eu; Redacted @ec.europa.eu
Subject: Read out of the meeting between VP Jourova and TikTok CEO

VP Jourová met TikTok CEO Shou Zi Chew on 10 Jan 2023

VP Jourová asked about several concerns regarding the protection of personal data of Europeans, child safety on the platform, spread of Russian disinformation on TikTok as well as transparency of paid political content.

VP Jourová said after the meeting: *I count on TikTok to fully execute its commitments to go the extra mile in respecting EU law and regaining trust of European regulators. There cannot be any doubt that data of users in Europe are safe and not exposed to illegal access from third-country authorities. It is important for TikTok and other platforms to swiftly get ready for compliance with the new EU digital rulebook, the Digital Services Act and the Digital Markets Act. I am also looking forward to seeing the first report under the new anti-disinformation Code to be delivered by the end of the January. Transparency will be a key element in this regard.*

VP Jourová appreciated the fact that TikTok joined the Code of Practice on Disinformation and that it swiftly implemented EU sanctions against Russian propaganda outlets. TikTok also recognises that non-EU state actors try to manipulate the content on the platform to spread disinformation and puts efforts to address this issue. TikTok informed that they invest in Ukraine and will deliver a detailed report under the Code.

On the VP question about the using the data of journalists to identify leaks in the company, the CEO confirmed that it was wrong and the people responsible for this do not work for the company any longer.

VP took note of the information provided by the Mr Chew. In particular, the efforts of TikTok to comply with the GDPR and to create a robust system of processing of data of Europeans in Europe. Mr Chew also elaborated on the TikTok investment in the content moderation practices that aim to limit the effect of hate speech and other "toxic content". He stressed that TikTok mission is to inspire creativity and bring joy.

--- ends ---

The video footage of the handshake is available here: [EC AV PORTAL – Search results \(europa.eu\)](#). There are also photos on the audiovisual portal

Best regards,

Redacted

(0032498978551)

Exhibit 26

From: [REDACTED]@google.com]
Sent: 3/19/2024 2:18:47 PM
To: STUMP Krisztina [REDACTED@ec.europa.eu]; RABBACHIN Alberto [REDACTED]@ec.europa.eu
CC: [REDACTED]@google.com; [REDACTED] [REDACTED]@google.com
BCC: [REDACTED]@google.com
Subject: YouTube update on Generative AI

Dear Krisztina and Alberto,

I wanted to share an update we announced yesterday related to Generative AI. While not specifically focused on disinformation, we thought it might be interesting to you.

At YouTube, innovation and responsibility go hand-in-hand and while we look forward to seeing how our creators continue to harness AI across our platform, responsibility remains at the center of all we do.

As we [shared at the end of last year](#), we believe it's in everyone's interest to maintain a healthy ecosystem of information on YouTube and that we help inform viewers when they're engaging with content made with generative AI.

Yesterday, [we launched](#) the next phase of this work, including a new tool to enable creators to easily share when the content they're uploading is made with altered or synthetic media, including generative AI. Creators will be required to disclose this content when it's realistic, meaning that a viewer could easily mistake what's being shown with a real person, place, or event. Labels will then appear within the video description information, and if content is related to sensitive topics like health, news, elections, or finance, we will also display a label on the video itself in the player window.

More information can be found in a [new blog](#), please let me know if you have any questions or would like to discuss these topics further.

I look forward to seeing you at our Fighting Misinformation Online event on Thursday!

Best,



[REDACTED] Head of EU Government Affairs and Public Policy [REDACTED]

[REDACTED]@google.com | [REDACTED]

Exhibit 27

From: [Redacted] [tiktok.com]
Sent: 5/28/2024 11:32:54 PM
To: [Redacted] [ec.europa.eu]
Subject: Re: [External] RE: Mtg at TikTok LA office 28 May - logistics, attendees

I am :)

[Redacted] is my public policy counterpart for the meeting and he will be there to greet you in the lobby.

Are you on schedule ok?

From: [Redacted] [ec.europa.eu]>
Date: Wed, May 29, 2024, 1:29 AM
Subject: Re: [External] RE: Mtg at TikTok LA office 28 May - logistics, attendees
To: [Redacted] [tiktok.com]>

Hi. Are you awake?:) who is the PoC on the ground? Thanks
Sent from my iPhone

On 28 May 2024, at 08:54, [Redacted] [tiktok.com]> wrote:

Thank you, all is well noted, including the presence of [Redacted] as well.

Kind regards

[Redacted]

From: [Redacted] [ec.europa.eu]>
Date: Tue, May 28, 2024, 4:11 PM
Subject: RE: [External] RE: Mtg at TikTok LA office 28 May - logistics, attendees
To: [Redacted] [tiktok.com]>
Cc: [Redacted] [ec.europa.eu]> [Redacted]
[Redacted] (@ec.europa.eu)> [Redacted]
[Redacted] [ec.europa.eu]>

Dear [Redacted]

We finally received the details of the driver and car that will bring VP Jourova and our delegation:

1. Vice-President Vera Jourova
2. Head of Cabinet [Redacted]
3. Member of Cabinet [Redacted]

4. Member of Cabinet **Redacted**
5. Head of EU office in San Francisco **Redacted**
6. Photographer **Redacted**

Assigned Chauffeur:

Redacted

Chauffeur Mobile:

Redacted

Vehicle Details:

Luxury Van

License Plate Number:

Redacted

Let me know if you need any additional information from our side.

All the best,

Redacted

Redacted

Assistant to **Redacted**

Member of the Cabinet of Vice-President Jourová

Values and Transparency

<image001.png>

European Commission

BERL 11/168

B-1049 Brussels/Belgium

Redacted

Redacted @ec.europa.eu

From: **Redacted** @tiktok.com

Sent: Tuesday, May 21, 2024 9:41 PM

To: **Redacted** @ec.europa.eu

Cc: **Redacted** @ec.europa.eu, **Redacted**

Redacted @ec.europa.eu, **Redacted**

Redacted

@ec.europa.eu

Subject: Re: [External] RE: Mtg at TikTok LA office 28 May - logistics, attendees

Well received, thank you.

From: **Redacted** @ec.europa.eu

Date: Tue, May 21, 2024, 8:44 PM

Subject: RE: [External] RE: Mtg at TikTok LA office 28 May - logistics, attendees

To: **Redacted** @tiktok.com

Cc: **Redacted** @ec.europa.eu **Redacted**
Redacted @ec.europa.eu, **Redacted**
Redacted @ec.europa.eu

Dear **Redacted**

I have just launched Webex invites for the call tomorrow.

All the best,

Redacted

Redacted
Assistant to **Redacted**

Member of the Cabinet of Vice-President Jourová

Values and Transparency

<image001.png>

European Commission

BERL 11/168

B-1049 Brussels/Belgium

Redacted

Redacted @ec.europa.eu

From: **Redacted** @tiktok.com>
Sent: Tuesday, May 21, 2024 7:41 PM
To: **Redacted** @ec.europa.eu>
Cc: **Redacted** @ec.europa.eu> **Redacted** @ec.europa.eu> **Redacted** @ec.europa.eu>
Redacted @ec.europa.eu>
Subject: Re: [External] RE: Mtg at TikTok LA office 28 May - logistics, attendees

Perfect. WebEx or call? My number is **Redacted** if needed.

Thanks

From: **Redacted** @ec.europa.eu>
Date: Tue, May 21, 2024, 7:31 PM
Subject: Re: [External] RE: Mtg at TikTok LA office 28 May - logistics, attendees
To: **Redacted** @tiktok.com>
Cc: **Redacted** @ec.europa.eu>, **Redacted** @ec.europa.eu>, **Redacted** @ec.europa.eu>
Redacted @ec.europa.eu>

I can do 1335. That works?

Sent from my iPhone

On 21 May 2024, at 18:55, **Redacted** @tiktok.com> wrote:

I have another meeting. I am also free 1-2pm tomorrow, and failing that at 09.30 on Thursday. Does either window work?

Thanks,

Redacted

From: [REDACTED] [ec.europa.eu](mailto:@ec.europa.eu)

Date: Tue, May 21, 2024, 6:50 PM

Subject: Re: [External] RE: Mtg at TikTok LA office 28 May - logistics, attendees

To: [REDACTED] @tiktok.com

Cc: [REDACTED] [ec.europa.eu](mailto:@ec.europa.eu), [REDACTED]
[REDACTED] [ec.europa.eu](mailto:@ec.europa.eu), [REDACTED]
[REDACTED] [ec.europa.eu](mailto:@ec.europa.eu)

10.50 works for you?

Sent from my iPhone

On 21 May 2024, at 16:49, [REDACTED]

[REDACTED] @tiktok.com wrote:

This would be great. Does 10am tomorrow suit by any chance?

[REDACTED]

From: [REDACTED] [ec.europa.eu](mailto:@ec.europa.eu)

Date: Tue, May 21, 2024, 4:39 PM

Subject: [External] RE: Mtg at TikTok LA office 28 May - logistics, attendees

To: [REDACTED] @tiktok.com

Cc: [REDACTED] [ec.europa.eu](mailto:@ec.europa.eu),
[REDACTED]
[REDACTED] [ec.europa.eu](mailto:@ec.europa.eu), [REDACTED]
[REDACTED] [ec.europa.eu](mailto:@ec.europa.eu)

Dear [REDACTED]

Than you very much.

Shall we try to have a call so we can discuss all the details?

Best,

Redacted

From: **Redacted** **@tiktok.com**>
Sent: Tuesday, May 21, 2024 10:11 AM
To: **Redacted** (CAB-JOUROVA)
Redacted **@cc.europa.eu**>
Cc: **Redacted** (CAB-JOUROVA)
Redacted **@cc.europa.eu**> **Redacted**
Redacted (CAB-JOUROVA) **Redacted**
Redacted **@cc.europa.eu**> **Redacted** (CAB-
JOUROVA) **Redacted** **@cc.europa.eu**>
Subject: Mtg at TikTok LA office 28 May - logistics,
attendees

Dear **Redacted**

I hope you enjoyed the holiday weekend.

Please find attached more detailed directions to our office in LA, in case helpful. I also list for you below the attendees for next week's meeting.

- Mr Shou Chew, TikTok CEO (remotely, in part)
- Mr Adam Presser: Head of Trust & Safety for TikTok, Head of Operations
- Ms **Redacted**, USDS (US Data Security)
- Mr **Redacted** Privacy Public Policy for the Americas
- Ms **Redacted** Public Policy, Brussels (remotely)

Please let us know if you will have any security detail travelling with you / entering the building. And as

discussed last week, we will have some refreshments / snacks available for the group.

Regarding communications/social media etc, may we ask what you plan to do in reference to the meeting?

Kind regards

Redacted

From: [Redacted] tiktok.com>

Date: Fri, May 17, 2024, 6:24 PM

Subject: Re: [External] Re: Meeting request - EU VP Jourova / CEO Shou - Los Angeles 28-29 May 2024

To: [Redacted] ec.europa.eu>

Cc: [Redacted] ec.europa.eu>,
[Redacted]
[Redacted] ec.europa.eu>, [Redacted]
[Redacted] ec.europa.eu>, [Redacted]
[Redacted] @tiktok.com>

Thanks.

No big differences in overall approach but our Trust & Safety experts in the US may have less familiarity with some of the nuances and trends/narratives associated with the EU ones whereas our T&S team located in Dublin and across Europe are of course differently positioned.

Noted on hate speech and GDPR, although we have quite a list of topics to cover in an hour. Do not hesitate to let me know if there is some prioritisation level.

Will you have security with you by the way?

Redacted

From: [Redacted] cc.europa.eu>

Date: Fri, May 17, 2024, 5:59 PM

Subject: [External] Re: Meeting request - EU VP Jourová / CEO Shou - Los Angeles 28-29 May 2024

To: [Redacted] tiktok.com>

Cc: [Redacted] cc.europa.eu>, [Redacted]

[Redacted] cc.europa.eu>, [Redacted]

[Redacted] cc.europa.eu>

Thank you.

See below in your email.

Sent from my iPhone

On 17 May 2024, at 17:41 [Redacted]

[Redacted] @tiktok.com> wrote:

Many thanks, [Redacted]

- For the **Transparency Centre** (more info [here](#)), we have some content moderation simulations and exhibitions, including an exhibit that uses replicated source code. The visit would add another hour to the meeting.

- The **office address** is: 5800 Bristol Pkwy, Culver City, CA 90230. I will share an on-the-ground PoC shortly. Very regrettably I cannot join you! We are extremely busy here on the elections and in live, daily (sometimes urgent) communications with the Parliament and other actors - only expecting this to intensify in the run up. I will join you remotely though in the middle of the night :)

Regarding these other questions, any steer for us?

1. Is the VP interested in discussing both EU and US election preparations, or to stay mostly EU focused?

We are interested in both. Are there big differences in your approach?

2. Do you have any more precise info on the 'cooperation with media sector/journalists' discussion item - is this one of particular interest or could we leave it aside if pressed for time? Happy to cover it though as needed.

██████████ is an expert on this so she will come back, but I guess it could cover issues like: how do you treat the editorial content. Any projects / approaches to support journalists and local media?

3. Would you expect that the VP would plan on covering anything from Commissioner Reynders portfolio?

Sure, hate speech (also the code) and GDPR comes to mind. Anything else?

4. If our Comms team wanted to reach out regarding any comms plans for the meeting, should they contact you or someone else? This can happen closer to the time of course.

Me and ██████████ are contacts on everything:)

Thanks!

██████████
Redacted

From: [Redacted]
[Redacted] @ec.europa.eu>

Date: Fri, May 17, 2024, 3:14 PM

Subject: RE: [External] Meeting request -
EU VP Jourova / CEO Shou - Los Angeles
28-29 May 2024

To: [Redacted]
:"[Redacted] tiktok.com>, [Redacted]
[Redacted] @ec.europa.eu>

Cc: [Redacted]
[Redacted]
[Redacted] cc.europa.eu>, [Redacted]
[Redacted]
[Redacted] cc.europa.eu>

Dear [Redacted]

Thank you for your questions and apologies
for late reply. I am replying to your question
directly in your email in green.

Could I ask you for the exact address of the
offices in LA and also the contact point on
the ground (or will you come with us?)☺?

Many thanks and all the best,

[Redacted]

From: [Redacted]
[Redacted] @tiktok.com>
Sent: Thursday, May 16, 2024 8:10
PM
To: [Redacted] (CAB-
JOUROVA)
[Redacted] @ec.europa.eu>
Cc: [Redacted] (CAB-
JOUROVA)
[Redacted] @ec.europa.eu>;

Redacted

Redacted tiktok.com>

Subject: Re: [External] Meeting
request - EU VP Jourova / CEO
Shou - Los Angeles 28-29 May 2024

And a few more questions to add if
you don't mind -

- Does anyone else on your side plan to join remotely? If not, we will use our own internal system to connect with Shou.

We are all in person, so feel free to use your internal system.

- I don't know what your schedule looks like for the day but we can provide light refreshments if you like.

If it is not too much trouble, that would be highly appreciated. But really light - some fruits or something. We will go for dinner surely after that. I also accept G&T ☺

- We have a Transparency Centre in LA which is across the street from the office - here we showcase some content moderation aspects and the TikTok algorithm. The tour takes 45 mins to one hour so it would depend on your schedule and the time you have. But we would be happy to arrange if of interest.

This sounds super interesting. I think theoretically we could make

it work. By when I would need to confirm that? Also, any insight into what VP might see there? Will help us decide.

Kind regards

Redacted

From: **Redacted**
Redacted @tiktok.com

Date: Thu, May 16, 2024, 3:57 PM

Subject: Re: [External] Meeting request - EU VP Jourova / CEO Shou - Los Angeles 28-29 May 2024

To: **Redacted**
Redacted [@ec.europa](mailto:@ec.europa.eu)
[@ec.europa](mailto:@ec.europa.eu)

Cc: **Redacted**
Redacted [@ec.europa](mailto:@ec.europa.eu)
[@ec.europa](mailto:@ec.europa.eu), **Redacted**
Redacted @tiktok.com

Dear **Redacted**

Regarding the meeting topics, may I ask the following:

1. Is the VP interested in discussing both EU and US election preparations, or to stay mostly EU focused?
2. Do you have any more precise info on the 'cooperation with media sector/journalists' discussion item - is this one of particular interest?

3. Would you expect that the VP would plan on covering anything from Commissioner Reynders portfolio?

Also, [Redacted] if our comms team wanted to reach out regarding any comms plans for the meeting, should they contact you or someone else? This can happen closer to the time of course.

Many thanks,

[Redacted]

From: [Redacted]
[Redacted] @cc.europa.eu

Date: Wed, May 15, 2024, 7:14 PM

Subject: Re: [External] Meeting request - EU VP Jourová / CEO Shou - Los Angeles 28-29 May 2024

To: [Redacted]
[Redacted] @tiktok.com

Cc: [Redacted]
[Redacted] @cc.europa.eu

Great, noted, thank you dear
[Redacted]

Sent from my iPhone - sorry for brevity

On 15 May 2024, at
18:45, **Redacted**

Redacted @tiktok.com wrote:

Dear **Redacted**

Adam Presser is available to meet the VP and her team on 28th May at 17:00. Shou is available to join at the very start of the meeting - 08:00 Singapore the following morning - and then Adam will continue. I will also join the meeting from Brussels online.

Kind regards

Redacted

From: **Redacted**
Redacted
Redacted @tiktok.com

Date: Wed, May 15, 2024, 7:33 AM

Subject: Re:
[External] Meeting request - EU VP Jourova / CEO Shou - Los Angeles 28-29 May 2024

To: **Redacted**
Redacted
Redacted @ec.europa.eu

Cc: **Redacted**
Redacted
Redacted cc.europa.eu >,
Redacted
Redacted
@tiktok.com >

Many thanks for all this, let me look into it today. In principle, Shou has said that he is available to dial in from Singapore so I will now check schedules to see what's possible.

Noted also on the topics.

Best regards

Redacted

From: **Redacted**
Redacted
ec.europa.eu >

Date: Tue, May 14, 2024, 10:00 PM

Subject: RE: [External] Meeting request - EU VP Jourova / CEO Shou - Los Angeles 28-29 May 2024

To: **Redacted**
Redacted @tiktok.com > **Redacted**
Redacted
cc.europa.eu >

Dear **Redacted**

Apologies for the delay, we are struggling with the agenda 😊

So we will need to take a plane to San Francisco at 11:25 on 29 May.

- But... we would have an important request, involving a very likely change in the timing. We understand that CEO Shou cannot be present. The VP is meeting all the other companies at CEO level. Therefore, would you please be able to check whether a short video connection with CEO Shou could be organised at the beginning of the meeting with Adam Presser? This would show the importance of the meeting for TikTok. It

can only be a few minutes, and the discussion continues with Adam Presser.

In that case, we need to take the time difference into account, which, if I am correct, is 15 hours between LA and Singapore. I therefore guess that a suitable time for all could be, for example, 27 or 28 May afternoon at around 17:00 or 18:00 in California, and 08:00 or 09:00 in Singapore. We are fully flexible on 27 May as of 16:00 until late, but I understand 27 May is off in the US, so it leaves us with 28 May around 17:00 or 18:00 (18:00 to 19:00 could fit on our side – or we can adapt the agenda to do the meeting earlier).

The delegation is VP, Head of Cabinet

Redacted

Members of Cabinet

Redacted and

Redacted

The broad topics that we can fine-tune: protection of

elections, protection of minors, fight against disinformation, AI, cooperation with media sector/journalists.

We are available to discuss of course!

Many thanks again for your help in facilitating the meeting, and kind regards,

Redacted

Redacted

Member of Cabinet

Vice-President Věra Jourová

<image001.gif@01D
AA648.65B1D3E0.gif>

**European
Commission**

Redacted

Redacted

Redacted @ec.eur
opa.eu

BERL 11/167

Rue de la Loi 200

B-1049
Brussels/Belgium

Redacted

From: Redacted

Redacted @tikto
k.com>

Sent: Tuesday, May
14, 2024 3:55 PM

To: Redacted
(CAB-JOUROVA)
Redacted @e
c.europa.eu>;
Redacted
(CAB-JOUROVA)
Redacted @ec
.europa.eu> Redacted
Redacted

Redacted @tiktok.com>

Subject: Re:
[External] Meeting
request - EU VP
Jourova / CEO Shou -
Los Angeles 28-29
May 2024

Dear **Redacted** and
Redacted

I am following up to
see if you might have
any additional
information about the
upcoming meeting
(time, duration,
attendee numbers
etc).

Many thanks and best
regards

Redacted

From: **Redacted**
Redacted
. "<**Redacted** tik
tok.com>

Date: Mon, May 6,
2024, 8:30 PM

Subject: Re:
[External] Meeting
request - EU VP
Jourova / CEO Shou -
Los Angeles 28-29
May 2024

To: Redacted

Redacted

Redacted @ec.europa.eu>,

Redacted

Redacted

Redacted ec.europa.eu>

Cc: Redacted

Redacted @ti

ktok.com>, Redacted

Redacted

@tiktok.com>

Dear Redacted and

Redacted

Pleased to confirm
that morning of 29th
May suits Adam
Presser for the
meeting. If you can
let us know the timing
specifics, we will
arrange things on our
side. Also, how many
will the Commission
team be in total?

It does not currently
look like Shou can
reorganise his existing
commitments in Asia
unfortunately. If this
changes, we will of
course let you know.

Best regards

Redacted

From: Redacted

Redacted

Redacted @tik
tok.com>

Date: Sat, May 4,
2024, 4:45 PM

Subject: Re:
[External] Meeting
request - EU VP
Jourova / CEO Shou -
Los Angeles 28-29
May 2024

To: **Redacted**
Redacted
[Redacted]@ec.europa.eu>,
Redacted
[Redacted]@ec.europa.eu>

Cc: **Redacted**
Redacted @ti
ktok.com> **Redacted**
Redacted
(@tiktok.com>

Many thanks, [Redacted]
and [Redacted] We will
work on finalising the
details next week and
will be in touch.

Can you let us know
for approximately
long the Vice-
President and her
team will be available
on the day? For
planning purposes,
note that our office is
located in the Culver
City district of LA.

Kind regards

Redacted

From: **Redacted**
Redacted
Redacted@ec.europa.eu>

Date: Fri, May 3,
2024, 11:37 PM

Subject: RE:
[External] Meeting
request - EU VP
Jourova / CEO Shou -
Los Angeles 28-29
May 2024

To: **Redacted**
Redacted @ti
ktok.com>

Cc: **Redacted**
Redacted
Redacted@ec.europa.eu>,
Redacted
(@tiktok.com>

Thank you dear
Redacted and
Redacted

The Vice-President
would be happy to
meet Adam Presser
(ideally on 29 May
morning).

Of course she would
greatly appreciate if
Mr Shou would also
be able to join.

Many thanks and kind
regards,

Redacted

From: Redacted
Redacted [ok.com](mailto:@tiktok.com)

Sent: Monday, April
29, 2024 9:34 PM

To: Redacted
(CAB-JOUROVA)
Redacted [.eu](mailto:@ec.europa.eu)

Cc: Redacted
(CAB-JOUROVA)
Redacted [.eu](mailto:@ec.europa.eu)
Redacted
Redacted [ok.com](mailto:@tiktok.com)

Subject: Re:
[External] Meeting
request - EU VP
Jourova / CEO Shou -
Los Angeles 28-29
May 2024

Dear Redacted

thank you for your email.
We very much appreciate
the interest from
Commissioner Jourová to
meet again with Shou - I
know that he has
previously found their
exchanges valuable.

I understand that you are in dialogue with my colleague [Redacted] already in the same matter, so I take the liberty of adding her to this email to have us all on the same thread.

Shou is scheduled to be in Asia that week and while we continue to look into the possibility of adjusting that - would Commissioner Jourová also be open to considering an in person meeting with Adam Presser, our Head of Trust and Safety and Operations, who is based in Los Angeles? We would be happy explore such alternative options in parallel.

Best regards,

[Redacted]

From: [Redacted]
[Redacted]
[Redacted]@ec.europa.eu>

Date: Sat, Apr 27,
2024, 8:35 PM

Subject: [External]
Meeting request - EU
VP Jourová / CEO
Shou - Los Angeles
28-29 May 2024

To:

[Redacted]@tiktok.com
[Redacted]
[Redacted]tiktok.com>

Cc: **Redacted**
Redacted
Redacted cc.europa.eu>

Dear **Redacted**

I hope this finds you well.

My name is **Redacted** and I work in the team of European Commission Vice-President Věra Jourová who deals with the protection of democracy in the EU.

Věra Jourová will have a series of meetings in California at the end of May to discuss the preparedness of tech companies ahead of EU elections.

In this context, Věra Jourová would very much welcome a meeting with Mr Shou in Los Angeles on 28 or 29 May. Would that be possible?

We could discuss the topics in detail and we are flexible, but Věra Jourová would

appreciate hearing about the fight against disinformation and illegal hate speech as well as the protection of children and the cooperation with independent media.

Věra Jourová would be accompanied by Head of Cabinet
Redacted
Members of Cabinet
Redacted and myself.

Please let me know should you need any additional information about this request.

Happy to discuss at your best convenience.

Kind regards,

Redacted

Redacted

Member of Cabinet

Vice-President Věra Jourová

<image001.gif@01D
AA648.65B1D3E0.gi
f>

**European
Commission**

Redacted

Redacted

Redacted ec.europa.eu

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B-1049
Brussels/Belgium

Redacted