PRIVILEGED AND CONFIDENTIAL

Snap Code of Conduct

Applicable throughout the European Union and European Economic Area under *The Dutch Media Act, implementation of the Audiovisual Media Services Directive*



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Foreword

At Snap, our mission is to contribute to human progress by empowering people to express themselves, live in the moment, learn about the world, and have fun together.

Our video sharing platforms, which are the subject of this Code of Conduct, form part of Snapchat; an app designed for people ages 13 and up, who primarily use it to talk with their close friends, similar to the ways they interact in real life.

Even as Snap grows and faces new opportunities and challenges, we remain grounded in kindness. Our engineers, designers, product managers, and other team members build our products and services to serve people. The well-being of the community informs our decision making, which in turn creates more value for our business over the long term.[1]

1. Introduction

The purpose of this Code of Conduct ("Code") is to describe how Snap complies with its requirements under the Dutch Media Act ("DMA") and Directive (EU) 2010/13 (as amended by Directive (EU) 2018/1808 (the "Audiovisual Media Services Directive" or "AVMSD")). The Code is applicable throughout the European Union as well as the European Economic Area. Snap is a "video sharing-platform service"("VSP") provider pursuant to Article 1(1)(aa) AVMSD.

Pursuant to Article 3a.3(1) of the DMA and Article 28b(1) and (2) of the AVMSD, Snap's objectives under this Code are to take appropriate measures to:

- protect EU minors from programmes, user-generated videos and audiovisual commercial communications on our video sharing-platform which may impair their physical, mental or moral development;
- protect the general public in the EU from programmes, user-generated videos and audiovisual commercial communications on our video sharing-platform containing:
    - incitement to violence or hatred directed against a group of persons or a member of a group based on any of the grounds referred to in Article 21 of the Charter;
    - content the dissemination of which constitutes an activity which is a criminal offence under Union law, namely public provocation to commit a terrorist offence as set out in Article 5 of Directive (EU) 2017/541, offences concerning child pornography as set out in Article 5(4) of Directive 2011/93/EU of the European Parliament and of the Council (*) and offences concerning racism and xenophobia as set out in Article 1 of Framework Decision 2008/913/JHA.
- comply with the requirements set out in Article 9(1) with respect to audiovisual commercial communications accessible to the general public in the EU that are not marketed, sold or

[1] See our Citizen Snap Report for more details.

arranged by Snap.

Sections 2, 3 and 4 of this Code provide a deep-dive into each in scope content category: the importance of protecting minors, combatting hate speech, terrorist content, child sexual abuse material and age appropriate and non-violating ads. This includes:

- Sections 2.1, 3.1 and 4.1 which describe our objectives
- Sections 2.2, 3.2, and 4.2 describe the measures we take in line with those recommended in Article 3a.3(2) of the DMA and Article 28b(3) of the AVMSD, which include safety by design, proactive moderation of content, safety resources for our community and our enforcement process.
- Sections 2.3, 3.3, and 4.3 describe our evaluation methods to measure whether our objectives are being achieved.

Section 5 of this Code provides an overarching summary of the measures Snap has implemented, pursuant to Article 3a.3(2) of the DMA and Article 28b(3) of the AVMSD. Section 6 describes our supervision and audit measures, pursuant to Article 3a.3(3)(a) of the DMA. Section 7 describes how Snap's Code of Conduct is supervised and enforced, pursuant to Article 3a.3(3)(a), of the DMA.

2. Protection of Minors

(Article 28b (1)(a) of the AVMSD)

2.1 Objective

Snap's priority is protecting the safety and wellbeing of our users whilst ensuring they have a positive experience online, especially our teen users between 13-17. Privacy, safety and security are key values and at the core of our value proposition to our users. Without measures to prevent harm, minors could become exposed to content that may impair their health, physical, mental and moral development.

2.2 Measures

To prevent the prevalence of content that may impair the health, physical, mental and moral development of minors, Snap has put in place a number of platform wide measures which are described in Section 5. In addition to these measures, Snap has implemented specific measures to further protect minors from being exposed to this type of content:

Snapchat is Only for 13+

First and foremost, teens must confirm that they are at least 13 to create a Snapchat account. When accounts are identified as potentially being held by an underage user, Snap acts swiftly to investigate the account and make a determination. If Snap can reasonably determine that the user is under 13 years of age, it will remove and delete the account. A user can appeal this enforcement action by contacting our community support team. More information about Snap's enforcement and appeals process can be found here.

Users are able to report accounts that they suspect are underage. The reporting option "They are under the minimum age for using Snapchat" enables users to support Snapchat in identifying and removing underage accounts.

To help address potential harms involving adults posing as minors, Snap uses age inference signals, systems designed to detect grooming, sexual exploitation and other harmful activity targeting minors, and targeted integrity and safety features aimed at limiting contact between adults and minors.

Restrictions on publishing public content

- We limit the ways in which teens can publish public content on our video sharing platform.
- We aim to distribute content created by teens to other teens and limit widespread distribution to avoid a teen user building a following that is not their own age.
- When teens post public content to our video sharing platform, by default we hide their names as an extra precaution. This reduces the likelihood of a range of risks including bullying and harassment and risk of negative effects on physical and mental health due to pressures to post, to inappropriate contact by malicious adults seeking to engage in activity prohibited on Snapchat (e.g. CSEAI).
- Comments on our video-sharing platform are auto-moderated for abusive language, and are reportable.

Accessing public content

- Our policies are written with the understanding that people as young as 13 may be viewing public content and it should be age appropriate. We have processes in place to moderate user generated content on our video sharing platform that violates our policies.
- Teen accounts are further restricted from accessing sexually suggestive content that some may not find appropriate. We use a combination of human review and machine learning to label user generated public content that is considered sexually suggestive so it is not eligible for recommendation to teen accounts on our video sharing platform.
- Some of our content partners have tools to make their content 18+ at their discretion if the content is not appropriate for all ages but must still follow our policies regarding appropriate categories of content on Snapchat.
- Filters are applied so that users accessing Snapchat via a browser without logging in will not have access to 18+ content on Spotlight.

These steps reduce the likelihood of teens publishing or accessing illegal or violating content, or content that may negatively affect their rights, security and health via our video sharing platform.

Wellbeing and safety resources

Snapchat offers well-being features designed to educate and empower members of the Snapchat community to support friends who might be struggling with their social or emotional well-being. These features include "Here for You" content Snap has developed with trusted external partners with the intention of educating Snapchatters about the importance of mental health, and ways to seek support. Our country-specific safety resources also provide Snapchatters with additional information about resources that are available to them in their country. For example, in the Netherlands, we provide the number for the Offlimits helpline, 113 suicide prevention hotline, Mind, and Join Us.

Family Centre

As described in Section 5, our in-app parental supervision tool, Family Center, gives parents, caregivers, and other trusted adults certain visibility and control, including giving them the option to limit sensitive content recommended to their teens on our video sharing platform. Parents are also able to easily report accounts that may be in violation of our Community Guidelines and have access to helpful resources directly in the app.

Reporting

As described in Section 5, teens can report violating content either via in-app or through our Snapchat Support site. Certain reporting options have been tailored to protect minors in particular. For example, the reporting option "They leaked/are threatening to leak my nudes" is designed to make it easier for teens to understand reportable instances.

Enforcement of our terms

We believe it is important that our policies promote consistent and fair enforcement. For this reason we consider a combination of factors to determine the appropriate penalties for violations of the Community Guidelines that may impair minors' health, physical, mental and moral development. The most important of these factors are the context of the violation (including information provided via user reports), the severity of the harm and any relevant history of the Snapchatter's previous violations. We apply a strike system that ensures that Snap applies its policies consistently, and in a way that provides warning and education to users who violate our Community Guidelines. For more information, please read Snapchat Moderation, Enforcement, and Appeals | Community Guidelines Explainer. Other factors taken into considerations to determine the appropriate penalty for a violation include the audience reached, minor-protection considerations and cross-platform indicators of co-ordinated activity.

2.3 Monitoring and Evaluation Measures

We monitor and evaluate the effectiveness of our measures through several quantitative and qualitative measures.

Quantitative monitoring and evaluation measures
Our quantitative monitoring and evaluation measures for the protection of teens accessing our video sharing platform include:

(1) Prevalence testing.
   (a) **Monitor**: Daily, public content on our video sharing platform is randomly sampled and checked by a team of human moderators. This is an on-going exercise to assess the prevalence of a range of content categories that may impair minors' health, physical, mental and moral development. These categories include, among others, harassment and bullying, self-harm and suicide, impersonation, weapons and drugs. Violative content is logged for evaluation and also sent to relevant teams for review and enforcement as appropriate.
   (b) **Evaluate**: We set target Policy Violating Prevalence (PVP) percentages that we expect for public content accessible to EU minors on our video sharing platform: (i) for each of our higher level harms and (ii) overall across all our harm categories. On a quarterly basis we internally report, based on sample content over a 90 day period, on Policy Violating Prevalence (PVP) broken down by harm category to assess whether we are meeting our targets.

(2) Suggestive content.
   (a) **Monitor**: We check the extent to which public content on our video sharing platform has been reviewed for sexually suggestive content, so that we can be assured that sexually suggestive content is not accessible to teens on our video sharing platform.
   (b) **Evaluate**: We set target review percentages that we expect for public content accessible to EU minors on our video sharing platform. On a quarterly basis, we internally report on the percentage of public content on our video sharing platform that has been reviewed to assess whether we are meeting our targets.

(3) Reporting.
   (a) **Monitor:** We check the time it takes for content reported to be falling with our higher priority harms to be re-reviewed and, if appropriate, taken down so that we can be assured that such reported content is promptly removed from access to teens on our video sharing platform.
   (b) **Evaluate:** We set targets for the median time it takes for us to receive an in-app report about public content on our video sharing platform falling within our higher

priority harm categories and to re-review that content and take it down if confirmed as falling within our higher priority harm categories. On a six-month basis, we internally report on the median time for each higher priority harm category to assess whether we are meeting our targets.

Qualitative monitoring and evaluation measures

Our qualitative monitoring and evaluation measures for the protection of teens accessing public content on our video sharing platform include:

(1) **Research**. We conduct research annually to gain insight into how young adults are faring across all platforms, services and devices, not solely Snapchat. Our signature study, Snap's Digital Well-Being Index (DWBI) includes perspectives from more than 6000 teens (aged 13-17) and young adults (18-24), as well as 3000 parents of teenagers between 13 and 19 in Australia, France, Germany, India, the UK and the U.S. The study is published yearly on Safer Internet Day in February. Our 2022 (DWBI) provides a measure of Generation Z's online psychological well-being. The results from this inaugural study helped to inform the development of Snap's Family Center. Our 2023 study, included a deeper-dive into the online "sextortion" of teens and young adults. A blog detailing the specific sextortion research findings and Snap's relevant platform actions was published on the WeProtect Global Alliance website. In response to the research study, Snap released new episodes to our Safety Snapshot series focusing on sexual risks and harms, specifically producing a module on financial sextortion.

(2) **Snap's Safety Advisory Board ("SAB")**[2]. The SAB includes three members who are young adults and youth advocates. We selected these applicants to ensure the Board has ready access to the all-important "youth voice" and viewpoint; to make certain a portion of the Board includes committed Snapchat users; and to seek to balance professional views with practical perspectives from a core demographic of the Snapchat community. In addition to Snap's SAB cohort, Snap regularly consults a cadre of some 40 safety experts from around the world. This group offered essential feedback in advance of the launch of Family Center, providing significant input that was reflected in the final Family Center feature-set and in subsequent updates. Members of this group were also consulted ahead of the addition of Content Controls to Family Center in early 2023.

(3) **Council for Digital Well-Being.** We value the participation and views of our teenage users. Our Council for Digital Well-Being is a program for selected teens between the ages of 13 and 16 who meet regularly to share their ideas for continuing to make Snapchat a safer, healthier, and more enjoyable place for creativity and connecting with friends

[2] The Safety Advisory Board ("SAB") represents members from a diversity of geographies, safety-related disciplines, and areas of expertise. SAB was developed to educate, challenge, raise issues with, and advise Snap on how best to keep the Snapchat community safe and counterbalance the online harms-dominated external landscape. When appropriate, the SAB provides feedback on new products, features, policies, and initiatives before they are launched or released. SAB meets three times annually.

(4) **Snap's Internal Compliance Function.** As described in Section 6, Snap's Internal Compliance Function convenes monthly to oversee and monitor relevant controls related to protection of minors.

3. Protection of the General Public From Incitement to Violence and Hatred against particular groups and Offences concerning child pornography, terrorism, Racism and Xenophobia

(Article 28b(1)(b), of the AVMSD and Article 28b(1)1(c) of the AVMSD)

3.1 Objective

As part of its broader objectives outside the remit of this Code, Snap is committed to protecting the general public from the three categories identified in Articles 28b(1)(b) and (b) of the AVMSD:

- Child Sexual Exploitation and Abuse Imagery ("CSEAI") is a particularly serious crime that violates children's rights and has far-reaching and serious detrimental lifelong consequences for its victims.[3]
- Terrorist content, including incitement to commit a terrorist offense and use for radicalization, recruitment, dissemination of propaganda, communication and mobilization in connection with terrorism, which is considered to be a grave risk to citizens and society at large[4].
- Hate speech, which may take many dangerous different forms and can be disseminated very quickly and widely through the internet, including on video-sharing platforms.

Without measures to protect the public, we recognise that CSEAI, terrorism and hate speech content could be accessible to the general public in the EU on Snap's video sharing platform and have thus taken the measures below to achieve our objective.

3.2 Measures

To protect the public from CSEAI, terrorism and hate speech content:

[3] European Commission, EU strategy for a more effective fight against child sexual abuse (COM(2020)607 final), url, 24 July 2020; Council of Europe, European Day on the Protection of Children against Sexual Exploitation and Sexual Abuse', url, updated October 2016.
[4] European Commission, Terrorist Content Online, url.

- Snap has put in place a number of platform wide measures which are described in Section 5. In particular:
    - Snap's terms prohibit harmful content, including CSEAI, terrorism and hate speech content.
    - Public content on our video sharing platform goes through auto-moderation and/or human review before being eligible for distribution to a wide audience, and Snap takes measures to ensure content does not go viral without being subject to human review. Our global moderation team undergoes training, and we consider all team members who are on the frontlines of reviewing and moderating content on Snapchat to be digital first responders whose well-being is being prioritized. For example, moderators can choose to opt out of a workflow if they no longer feel comfortable with the content.
    - Snap's privacy and safety-by-design approach aims to mitigate the likelihood of harmful content on Snapchat. For example, public content on Snapchat is generally ephemeral in nature and Snapchat does not offer an open news feed where unvetted publishers or individuals have an opportunity to broadcast harmful content.
    - Our in-app reporting tool allows Snapchatters to directly report CSEAI, terrorism, hate speech content and activities that support terrorism or violent extremism.

- Snap's Trusted Flagger Program helps non-profits, non-governmental organizations (NGOs), select government agencies, and safety partners support the Snapchat community by leveraging a special channel to report content that violates Snapchat's Community Guidelines. Notices submitted to Snap by Trusted Flaggers are processed without undue delay, with reports relating to the most serious harms prioritised for prompt review. Snap carefully considers information provided by Trusted Flaggers as part of its assessment. Where appropriate, that information may assist Trust & Safety in corroborating reported concerns and conducting further investigation. As described in Section 2.2, Snap takes into account the context of the violation, the severity of the harm and any relevant history of the Snapchatter's previous violations.

- In addition to providing a specific reporting channel, the Trusted Flagger Program also allows us to build strong relationships with Trusted Flaggers. Snap makes use of our strong relationship with Trusted Flaggers to give product safety updates, encourage the promotion of our safety tooling, and provision of safety resources (like links to our Safety Center).

- As described in Section 5, Snapchatters can report content to us via in-app reporting options, and anyone can submit a report through the Snapchat Support site. Reports are reviewed by our team that operates 24 hours a day, 7 days a week, and violating content or accounts are subject to enforcement as described below. We strive to review and

respond to user reports as soon as possible, and we inform the reporter of any action taken as a result of the report

- In addition to the above mentioned platform wide measures, Snap has implemented a number of specific measures:

    - For CSEAI content:
        - By using Snapchat, Snapchatters explicitly agree under our terms not to post, save, send, forward, distribute, or ask for nude or sexually explicit content involving anyone under the age of 18 (this includes sending or saving such images of themselves).
        - Snap proactively scans content that is uploaded on Snapchat against hash lists of known CSEAI using PhotoDNA and Google CSAI Match.
        - Our country-specific safety resources provide Snapchatters with additional information about resources that are available to them in their country. For example, in the Netherlands we provide the national hotline for unwanted online behaviour such as sexual exploitation of minors.
        - Our Safety Snapshot series focuses on sexual risks and harms, specifically producing a module on financial sextortion.
        - Snap has strong relationships with trusted flaggers to bring these and other types of harms to the attention of our trust and safety teams and provide feedback on our service.

    - For hate speech content:
        - We work with subject matter experts, such as Saferinternet.at in Austria, Licra in France or Hate Aid in Germany, among others, to help identify hate speech and we have expanded our definition of hate speech in our Community Guidelines including both illegal and legal but harmful speech. As such, Snap's definition of hate speech is more inclusive than the AVMSD's legal definition of hate speech, because Snap wants to tackle harmful (but) legal speech as well.
        - Our country-specific safety resources also provide Snapchatters with additional information about resources that are available to them in their country. We also provide teens with safety resources. For example, in the Netherlands we provide access to Offlimits, the national hotline for Snapchatters to report text, image, or video that may be offensive to certain groups.

Enforcement of our terms

When Snap becomes aware that CSEAI, terrorism or hate speech content is present on its video sharing platform, Snap has teams in place to take appropriate enforcement action:

- In the case of CSEAI confirmed by our teams, we remove the content, take appropriate enforcement action against the account, and report content to National Center for Missing & Exploited Children ("NCMEC"). Our Sexual Content | Community Guidelines Explainer explains what is covered by CSEAI and provides more details on our approach to enforcement on CSEI.

- Our Hateful Content, Terrorism, and Violent Extremism | Community Guidelines Explainer explains what is covered by terrorism content and provides more details on our approach to enforcement on terrorist content. Where terrorism content is confirmed by our teams, Snap removes the content, disables accounts, and reports to law enforcement as appropriate.

- In the case of hate speech content confirmed by our teams, we remove the content and users who engage in repeated or egregious violations will have their account access locked. For example, if a Snapchatter ignores the in-app notice of violating hate speech, and persists in violating our policy, we will take account-level action; or, if the hateful content includes a specific threat of imminent violence, the severity of the violation will warrant account-level enforcement on the first offense. As an additional measure, we encourage Snapchatters to block any users who make them feel unsafe or uncomfortable. Our Hateful Content, Terrorism, and Violent Extremism | Community Guidelines Explainer explains what is covered by hate speech content and provides more details on our approach to enforcement on hateful content.

3.3 Monitoring and Evaluation Measures

We monitor and evaluate the effectiveness of our measures to protect the general public from public CSEAI, terrorism and hate speech content on our video sharing platform through several quantitative and qualitative measures.

Our quantitative monitoring and evaluation measures are as follows:

(1) Prevalence testing.
   (a) **Monitor:** As above, daily, public content on our video sharing platform is randomly sampled and checked by a team of human moderators. This is an ongoing exercise to assess the prevalence of CSEAI, terrorism and hate speech content. Violative content is logged for evaluation and also sent to relevant teams for review and enforcement as appropriate.
   (b) **Evaluate:** We set target Policy Violating Prevalence (PVP) percentages that we expect for public content accessible to the general public on our video sharing platform for CSEAI, terrorism and hate speech content. On a quarterly basis we internally report, based on sampled content over a 90 day period, on Policy

Violating Prevalence (PVP) for CSEAI, terrorism and hate speech content to assess whether we are meeting our goals.

(2) Reporting.

(a) **Monitor:** We check the time it takes for content confirmed to be CSEAI, terrorism or hate speech content to be taken down so that we can be assured that such reported content is promptly removed from access to the general public on our video sharing platform.

(b) **Evaluate:** We set targets for the median time it takes for us from us receiving an in-app report about CSEAI, terrorism or hate speech public content on our video sharing platform and to us re-reviewing that content and taking it down if confirmed as CSEAI, terrorism or hate speech content. On a six month basis, we internally report on the median time for each higher priority harm category to assess whether we are meeting our targets.

In addition, we produce a semiannual (every 6 months) Transparency Report, which captures our enforcement data related to CSEAI, terrorism or hate speech content. The report includes the number of content and accounts that were reported to us for violating our Community Guidelines on CSEAI, terrorism or hate speech, the number of content reported for violation of our Community Guidelines on CSEAI, terrorism or hate speech that we enforced against and the percentage of that number in relation to the total number of content enforced across all harm categories. We also provide the number of accounts we enforced against for violating our rules on CSEAI, terrorism or hate speech and the median turnaround time.

Snap works with NCMEC and other safety experts to learn about CSEAI and how they may manifest themselves on our platform, and to report such harm to the proper authorities. Snap has strong relationships with trusted flaggers to bring these and other types of harms to the attention of our trust and safety teams and provide feedback on our service.

Snap recognizes that measures and targets may, when needed, be adapted. For example, since we started testing the prevalence of CSEAI, terrorism and hate speech content amongst the public content accessible via our video sharing platform, we have developed significant proactive measures to detect and root out this content which has led to significant improvements confirmed by subsequent prevalence testing.

Snap's Compliance Function, as described in Section 6, convenes monthly to oversee and monitor relevant controls related to CSEAI, terrorism or hate speech.

4. Advertising Restrictions

(Article 28b(2) and Article 9 of the AVMSD)

4.1 Objective

Our objective is to ensure that ads and commercial content on Snapchat are appropriate and comply with applicable laws, including Article 3a.3(1) of Dutch Media Act. That is why we have taken the measures below to prevent violating ads or commercial content on Snapchat.

4.2 Measures

As detailed in Section 5, advertisers who submit ads to run on Snapchat must ensure those ads comply with our Advertising Policies, and Snapchatters who submit content on the Snap platform other than ads served by Snap, which is sponsored by, promotes or advertises any brand, products, goods or services ("commercial content") must ensure that content complies with our Commercial Content Policy, including identifying the commercial nature of the content. Both our Advertising Policies and Commercial Content Policy prohibit subliminal messaging and require that content complies with applicable laws, statutes, ordinances, rules, public order rules, industry codes and regulations, as well as Snap's Terms of Service and Community Guidelines.

In addition to our terms and policies, commercial content on our video sharing platform goes through auto-moderation and/or human review to promote compliance with our Community Guidelines and Content Guidelines for Recommendation Eligibility before being eligible for distribution to a wide audience. The Content Guidelines apply a stricter standard and are designed to prevent recommendation of content that Snap does not want to amplify, even if that content is not illegal or a violation of the Community Guidelines. For example, our Community Guidelines prohibit expressing support for violence or encouraging violence against anyone. The Content Guidelines go further to prohibit even ambiguous support for or tacit approval of violence. In addition, commercial content may only be eligible for recommendation beyond the creator's friends' or followers if it comes from a select, pre-approved partners and creators.

Ads are reviewed before they are published on Snapchat to promote compliance with our Advertising Policies. We provide moderators with detailed guidance as to how to interpret and enforce our policies, including country- and subject-specific instructions and training. Snap also offers easily accessible reporting functions in the app and on the web, including the ability to report commercial content and ads.

Ads must be suitable for their selected audience in each geographic area where the ads will run: to prevent Snapchatters from being exposed to unsuitable ads, we require minimum age

targeting of ads for regulated goods and services, and other potentially inappropriate ads such as ads for weight loss products, dating apps, and ads for movies, video games and television programmes with age-restricted target audiences. The review process outlined above helps Snap to ensure that advertisers target ads at appropriate audiences. For example, if an ad promotes or references alcohol and the selected audience demographic for the ad includes users younger than the minimum age required in our advertising policy for the targeted countries, then the ad will not be approved to run targeted to those Snapchatters.

Political advertising (including election-related ads, advocacy ads and issue ads) must include a "paid for by" message in the ad, and all political ads are reviewed against our policies, including for deceptiveness, misinformation, and purposefully misleading content against our policies. We maintain transparency by giving the public an opportunity to find out details about all political and advocacy advertising running on our platform in our Political Ads Library. As with any ad, Snap reserves the right to require factual substantiation of claims, and engages partners to independently fact-check political ad statements.

Snap maintains an Ads Gallery, which provides an overview of ads that have run on Snap in the EU over the past year and some details about the targeting and reach of those ads, such as whether the information is an ad, on whose behalf advertising is presented and (if this differs) the person or organization who paid for the ad, and the content of ads.

Enforcement of our terms
When we detect or are notified of commercial content and ads that violate our terms (including illegal advertising), we will take appropriate action which may include taking down the commercial content or ad or sending it to human review for additional moderation.

4.3 Monitoring and Evaluation Measures

We monitor and evaluate the effectiveness of our measures to ensure that ads and commercial content on Snapchat are appropriate and comply with applicable laws as follows:

(1) Pre-Review.
   (a) **Monitor:** We check the extent advertising on our video sharing platform has been reviewed so we can be assured that they comply with our terms (including compliance with the law).
   (b) **Evaluate:** We set target review percentages that we expect from advertising on our video sharing platform. On a quarterly basis, we internally report on the percentage of advertising on our video sharing platform that has been reviewed to assess whether we are meeting our targets.

(2) Reporting.

(a) **Monitor:** We check the time it takes for advertising reported to be illegal or otherwise violating our terms to be re-reviewed and, if appropriate, taken down so that we can be assured that such reported advertising is promptly removed from access to the general public on our video sharing platform.

(b) **Evaluate:** We set targets for the median time it takes for us from us receiving an in-app report about advertising that is illegal or otherwise violating our terms on our video sharing platform, to us re-reviewing that advertising and taking it down if confirmed as being illegal or otherwise violating our terms. On a six month basis, we internally report on the median time to assess whether we are meeting our targets.

Snap recognizes that measures may, when needed, be adapted. For example, where we identify that a particular form of advertising is causing a significant issue, our advertising review teams will be particularly vigilant for this form of advertising in their pre-reviews.

Snap's Internal Compliance Function, as described in Section 6, convenes monthly to oversee and monitor relevant controls related to advertising and commercial content.

5. Appropriate Measures

In the table below we indicate the measures we have taken to mitigate the likelihood of violating content on Snapchat's in-scope services, using the defined list of measures set out in Article 3a.3(2) of the DMA and Article 28(b)(3) of the AVMSD.

Video-sharing platform providers shall implement appropriate measures pursuant to Article 3a.3(2) of the DMA and Article 28b(3) of the AVMSD. Such measures shall consist of, as appropriate:	Snap's effort to comply with Article 3A.3(2) of the DMA and Article 28b(3) of the AVMSD.
(a) including and applying in the terms and conditions of the video-sharing platform services the requirements referred to in paragraph 1;	Our Term of Service and Community Guidelines prohibit the harmful content that Snap is obliged to prevent on the video-sharing platform pursuant to Article 3a.3 of the DMA. Our Term of Service and Community Guidelines has been designed to be read

	by all users, from 13 years upwards, including summaries and explainers. This helps all users to understand what activity is prohibited on Snapchat and the consequences, which reduces the likelihood they will engage in activity which could result in violating content. Our Term of Service requires public content to be suitable for all Snapchatters (i.e. 13+). This helps ensure Snapchat is suitable for minors and reduces risks violating content pursuant to Article 3a.3 of the DMA. Snap also provides users who submit content to the Spotlight area of our video sharing platform with clear Spotlight Guidelines, describing the legal requirements for submissions to Spotlight, as well as reminding users of the terms (including our Community Guidelines). We have specific publishing agreements with our premium partners that submit content on our video sharing platform, such as media organizations and Snap Stars, that require them to abide by our Terms (including our Community Guidelines and Content Guidelines for Recommendation Eligibility).
(b) including and applying in the terms and conditions of the video-sharing platform services the requirements set out in Article 9(1) for audiovisual commercial communications that are not marketed, sold or arranged by the video-sharing platform providers;	Advertisers who submit ads to run on Snapchat must ensure those ads comply with our Advertising Policies, and Snapchatters who submit content on the Snap platform other than ads served by Snap, which is sponsored by, promotes or advertises any brand, products, goods or services must ensure that content complies with our Commercial Content

	Policy, including identifying the commercial nature of the content. Both our Advertising Policies and Commercial Content Policy require that content complies with applicable applicable laws, statutes, ordinances, rules, public order rules, industry codes and regulations, including, if applicable, the Dutch Advertising Code to which Snap is affiliated. Our Advertising Policies clearly require advertisers to abide by the requirements set out in Article 9(1) of the AVMSD.
(c) having a functionality for users who upload user-generated videos to declare whether such videos contain audiovisual commercial communications as far as they know or can be reasonably expected to know;	We automatically place an "Ad" marker on paid ads that run on Snapchat. Sponsored Lenses say "Sponsored". Our commercial content policy requires organic content posted by influencers to be marked appropriately. We offer a "Paid Partnership" tag tool that influencers and Snapchatters may use when they post commercial content to help them comply with this policy and their legal obligations.
(d) establishing and operating transparent and user-friendly mechanisms for users of a video-sharing platform to report or flag to the video-sharing platform provider concerned the content referred to in paragraph 1 provided on its platform;	Snapchatters have the ability to report abuse they may observe or experience within Snapchat. They can easily report content by navigating to the clearly marked "Report" option in the menu on each of these screens or by pressing and holding on the content itself. Snapchatters can go through our simple reporting flow and provide their reason for reporting and add any additional comments that might be relevant to the case.
(e) establishing and operating systems through which video-sharing platform providers explain to users of video sharing	Reports are reviewed by our Trust & Safety team that operates 24 hours a day, 7 days a week, and violating content or accounts are subject to enforcement. To ensure Snapchatters have a clear

platforms what effect has been given to the reporting and flagging referred to in point (d);	understanding of why an action has been taken against their account, and to provide an opportunity to meaningfully dispute the enforcement outcome, we have a Notice & Appeals process that safeguard the interest of our community while protecting Snapchatter's rights.
(f) establishing and operating age verification systems for users of video-sharing platforms with respect to content which may impair the physical, mental or moral development of minors;	Snap relies on declared age to limit access to Snapchat to its 13+ audience. Users must add their birthday when registering for an account, and we do not allow users declaring they are under the age of 13 to create accounts. We also use a combination of declared and inferred age techniques for stronger age assurance to limit under 18 access to certain content and features targeted at more mature audiences.
(g) establishing and operating easy-to-use systems allowing users of video-sharing platforms to rate the content referred to in paragraph 1;	As described under (d) Snapchatters can easily report content by navigating to the clearly marked "Report" option in the menu. Snapchatters must choose a reason for reporting including, among others, "Nudity & sexual content" and "hate speech, terrorism & violent extremism". Each category also has subcategories and free text input for Snapchatters to add any additional comments that might be relevant to the case.
(h) providing for parental control systems that are under the control of the end-user with respect to content which may impair the physical, mental or moral development of minors;	Our in-app parental supervision tool, Family Center, gives parents and trusted adults visibility access to Content Controls, giving them the option to limit sensitive content recommended to their teens on our video sharing platform. Parents are also able to easily report accounts that may be in violation of our Community

	Guidelines and have access to helpful resources directly from the app.
(i) establishing and operating transparent, easy-to-use and effective procedures for the handling and resolution of users' complaints to the video-sharing platform provider in relation to the implementation of the measures referred to in points (d) to (h);	Snapchatters have multiple avenues to contact Snap. These include: ● Sending mail or emailing Snap as described here and; ● Submit a request through our Support Center In addition, we offer Snapchatters a dispute resolution mechanism as describe in our Terms of Service,
(j) providing for effective media literacy measures and tools and raising users' awareness of those measures and tools.	We provide a suite of tools on our website, in app stores and in our application to raise awareness to Snapchatters. These include our Privacy Center, Safety Center, Support Center, Family Center, Transparency Center, our terms, just-in-time notices and various campaigns. Additionally, our digital literacy program Safety Snapshot is aimed at educating Snapchatters about issues like data privacy, security and online safety.

6. Supervision Measures and Audits

Platform Risk Framework

Snap has a formalized principles-based framework that reflects our values and respect for digital rights when identifying, investigating or mitigating risk across Snapchat's in-scope services. The framework is divided into two parts that borrow from relevant, longstanding elements of the international human rights framework: (1) identification of core platform governance values; and (2) a set of balancing principles for weighing those values against risks to our community and other harms. Reference to both of these elements in conjunction with one another provides a

consistent approach for responsibly reviewing proposed harm mitigations with attention to foundational values.

We have a responsible, rights-respecting approach to platform governance and detecting and managing risk. We anticipate that our Internal Compliance Function and its cross-functional working groups will review this approach annually to ensure it is in line with legal requirements, including requirements under the Dutch Media Act, and global best practices.

Internal Compliance Function & Audits

Snap has established an Independent Compliance Function (ICF) as part of the Snap Legal team, separate from Snap operations, with sufficient authority, stature, and resources that is responsible for coordinating, overseeing, and implementing Snap's Privacy and Regulatory Program. The ICF convenes monthly and provides oversight to ensure the necessary internal processes, resources, testing, documentation, or supervision are in place for compliance with law, including the Dutch Media Act, and monitors Snap's compliance with the Dutch Media Act. Snap has designated Independent Compliance Officers who report to the Management Body. The Management body oversees and supports the compliance function and manages issues as escalated to the Body. Snap's Independent Compliance Officers and/or Management Body frequently updates the Board and executives on matters related to compliance. Snap's internal Risk Advisory Partner team annually facilitates the conduct of an internal audit.

7. Supervision and Enforcement of Snap's Code

We inform the public that Snap is regulated by the Dutch Media Authority (CvdM) for purposes of the AVMSD and DMA. The Code is part of a system of co-regulation with the CvdM. Snap is responsible for setting specific, measurable, achievable, realistic and timely objectives as described in this Code, implementing appropriate measures to meet those objectives, and implementing supervisory and evaluation measures to assess whether Snap achieves its objectives. To enable the CvdM to appropriately exercise its co-regulation powers, Snap shall cooperate with the CvdM as needed and meet with the CvdM on a regular cadence to report progress on its objectives. The CvdM has supervision and administrative enforcement powers detailed in Chapter 7 of the DMA.

Snap is committed to the safety of our communities on Snapchat. We will continue to monitor the effectiveness of our measures described in the Code so we are equipped to identify and adapt to address new trends and risks.