Report under Regulation (EU) 2022/2065 of the European Parliament and of the Council (Digital Services Act) on all moderation of content on the Allegro platform for 2024.

### I. Introduction

Allegro sp z o.o., as a marketplace subject to the provisions of the Digital Services Act, hereby submits this report on content moderation. The report has been prepared in accordance with the requirements of the Regulation and includes information on the measures taken as a result of the application and enforcement of the terms of service.

The key activity of Allegro sp. z o.o. is running an e-commerce platform (marketplace) that allows sellers to offer and sell products on the online market and reach their target buyers. On its main market, in Poland, Allegro manages an online platform connecting sellers and buyers (Allegro.pl). In addition, the platform also operates in Czechia, Slovakia and Hungary. Sellers on Allegro offer a wide range of products in categories such as: Automotive, Home and Garden, Culture and Entertainment, Collections and Art, Fashion, Electronics, Kids, Health, Beauty, Sports and Travel, and Supermarket.

The rules for the sale of products and detailed information for sellers regarding allowed products, as well as the restrictions on the sale of products on specific markets are presented in the Allegro Terms & Conditions.

Download the report for 2024 (17.02.2024 - 31.12.2024)

- <u>part 1</u> and <u>part 2</u> (.csv)

# 1. Summary of content moderation carried out at the providers' own initiative

Over the past year, Allegro has actively participated in the process of moderating content on the platform, implementing a number of actions to ensure the security of transactions and compliance of offers with applicable law and regulations. With our commitment, a comprehensive moderation system has been established that includes both proactive and reactive actions.

### Proactive actions:

 Proactive search for offers that violate the Terms & Conditions: Our systems regularly search the entire database of offers to detect content that violates the Terms & Conditions.

- Training and education: We regularly organize trainings for our users, including sellers, on applicable laws and rules of safe selling on the Allegro platform. Educational materials are available in various formats, such as webinars, articles, and messages displayed during the listing of offers.
- Cooperation with external experts: We cooperate with law enforcement authorities and authorized representatives of individual brands in the field of product safety in order to prevent illegal activities on the platform.

### **Reactive actions:**

- Effective notification system: We have provided users with intuitive application forms, enabling easy reporting of content that is illegal or violates the Terms & Conditions. Each report is analyzed by our moderators, and in the event of a confirmed violation, the content is removed, modified accordingly, or appropriate actions are taken towards the author of such content.
- **Manual moderation:** Our moderators manually verify all reports, which allows us to detect more complex cases of violations of the Terms & Conditions.
- **Soft moderation** restrictions: In some cases, instead of completely removing content, we use what is called "soft restrictions" requiring the user to edit the content posted on the site. This allows us to reduce the negative effects of violations while allowing users to improve their content.

#### Effects of our actions:

- Significant reduction in the number of offers that violate the Terms & Conditions: Thanks to the implemented solutions, we managed to significantly reduce the number of information containing illegal content, which contributed to the improvement quality of services provided by the Allegro platform.
- Increased user awareness: Regular training and educational campaigns have contributed to increasing user awareness of the rules of safe selling and use of the platform.
- Improving the credibility of the platform: Thanks to effective content moderation, the Allegro platform is reliable in the eyes of users, which builds confidence in transactions carried out on the platform.

# 2. Relevant and understandable information on the detection method used

In order to provide recipients with the highest level of security, Allegro has an advanced system for detecting content violating the law or the platform's Terms & Conditions. Our actions are aimed at creating a safe and trustworthy environment for all users.

# **Automated detection systems:**

• **Content analysis:** We use advanced algorithms, including Al-based algorithms, that analyze both text and images, to detect keywords, patterns, and contexts that indicate potential violations.

- **User verification:** Based on historical data about user activity, such as the type of products offered, transaction history, or communication patterns, we create risk profiles that help identify potential violations.
- **Real-time monitoring:** Our systems monitor the activities and content posted on the platform in real time analyzing, among others, offers and user interactions in order to quickly and efficiently detect any irregularities.

## Teams of experts:

- Compliance specialists: The team of experts in compliance with the law and the platform's Terms & Conditions conducts an in-depth analysis of users' reports and outcomes from automated systems, making decisions on the next steps.
- Cooperation with external experts: We work with experts in the field of copyright, trademarks, and other areas related to intellectual property in order to ensure the highest effectiveness of our activities.

#### Reactive measures:

- **Notifications and cooperation:** If a potential violation is detected, we take prompt action, such as notifying users, rights holders, and the relevant authorities.
- **Rights Protection Cooperation Program:** We have a program in place that allows rights owners to effectively report violations and take prompt corrective action, and we work closely with many <u>brands</u> in this program.

### Additional actions:

- **Trend analysis:** We regularly analyze data on detected violations to identify new threats and improve our systems.
- **User education:** We conduct educational activities, informing users about the applicable regulations and rules for using the platform safely.

### Thanks to these actions, we can:

- Detect violations quickly: Our systems make the rapid detection of even the most complex cases of violations possible.
- **Minimize the risk to users:** Thanks to our actions, users can be sure that transactions carried out on the platform are safe.
- Protection of intellectual property rights: We actively cooperate with rights owners to protect their interests.

**In summary,** our systems for detecting content violating the law or the platform's Terms & Conditions are constantly developed and improved, which allows us to provide the highest level of security and confidence in the platform.

# 3. Measures taken to provide training and assistance to persons responsible for content moderation

During the reporting period, the Allegro platform placed particular emphasis on ensuring the highest standards of content moderation through a comprehensive program of employee training and competence development. In our actions, we focused on equipping both internal moderators and internal account managers with the knowledge necessary to effectively detect and remove content violating the law or the platform's Terms & Conditions.

### Main areas of training:

- Laws and regulations: We have organized a number of training courses on applicable laws, in particular in the field of e-commerce, consumer protection, and intellectual property. As a result, our moderators are fully aware of the legal aspects of content moderation and can make decisions in accordance with applicable regulations.
- DSA (Digital Services Act): In connection with the Digital Services Act entering into force, we prepared specialized trainings and educational materials that enabled our employees to understand the new legal requirements and adapt our procedures to the new regulations.
- Internal procedures: We regularly updated and improved our internal content moderation procedures, and then conducted trainings to familiarize employees with new requirements and tools.
- Ethical aspects of moderation: We paid special attention to social media ethics trainings to make our employees aware of how important it is to make decisions objectively and impartially.

# Completion of training activities:

- Systematic knowledge testing: In order to verify the acquired knowledge, we conducted regular tests among our employees, which allowed to identify possible gaps in knowledge and apply appropriate corrective measures.
- Access to educational materials: We provided our employees with constant access to a variety of educational materials, such as online courses, articles, and presentations, which enabled them to deepen their knowledge at any time.
- Cooperation with external experts: We cooperated with external experts who conducted specialized training courses and workshops, which allowed us to broaden our employees' knowledge in narrow thematic areas.

### Thanks to these actions, we managed to achieve the following results:

- **Increase employee awareness:** Our employees have up-to-date knowledge of applicable laws and internal procedures, which allows them to make informed decisions in the process of content moderation.
- **Improve the quality of moderation:** Thanks to the acquired knowledge and skills, our moderators are able to detect increasingly complex cases of violations of the Terms & Conditions and take effective actions.

- Increase work efficiency: The automation of selected processes and the use of tools based on artificial intelligence have contributed to increasing the efficiency of our moderators' work.
- **Building an online safety culture:** Through the social media ethics training courses, we have built a culture of responsibility and awareness among our employees regarding the importance of the actions they take.

**In summary**, our training activities have contributed to the creation of a highly qualified team of moderators that is able to ensure the highest level of safety and quality on our platform.

# 4. A summary of the use of automated means for content moderation purposes

During the reporting period, Allegro intensively developed and improved automated content moderation systems to ensure a safe and compliant environment for all users.

### Our approach is based on several key areas:

- **Text and image analysis:** We use advanced algorithms to analyze both text and images. This allows us to detect materials that contain obscenities, threats, and identify specific objects in images that may violate our policies.
- **Detection of behavior** patterns: Our systems are configured to detect unusual patterns of user behavior, such as suspicious transactions between linked accounts and sudden spikes in sales.
- Account data analysis: We conduct a detailed analysis of each user's account data to detect potential fraud and violations of the Terms & Conditions.
- Keywords and regular expressions: We use advanced search techniques, such as keywords and regular expressions, to identify content with unauthorized words or phrases.
- **Algorithms based on index analysis:** Our algorithms analyze different user activity indexes to detect suspicious behavior.

# Thanks to these solutions, we are able to effectively detect and prevent the following types of violations:

- Offensive and obscene content: Our systems automatically block comments, product reviews, messages, and offers that contain profanities, threats, and other offensive content.
- **Fraud:** We effectively detect cases of fraud and abuse.
- Copyright violations: Our systems help detect copyright-violating content, such as images or product descriptions protected by copyright.
- Actions non-compliant with the Terms & Conditions: We automatically detect and block activities that do not comply with the platform's Terms & Conditions, such as proposals for submitting offers outside the platform or manipulating reviews.

**In summary**, our automated systems play a key role in ensuring security and integrity on our platform. Thanks to the continuous development and improvement of these systems, we are

able to effectively counteract all forms of abuse and provide our users with a safe and pleasant shopping experience.

# 5. Qualitative description of automated means

During the reporting period, Allegro implemented and effectively employed advanced automatic content moderation systems, which significantly contributed to ensuring the security and compliance of our platform with applicable regulations.

### Our solution is based on a multi-layered surveillance system that includes:

- Automatic identification of problematic content:
  - High effectiveness for offers and accounts: Our algorithms show high effectiveness in automatic detection of content that does not comply with the Terms & Conditions, both in offers and in user profiles.
  - Selective identification for verification: For content that requires a more detailed analysis, our systems automatically flag them for manual verification by our moderators.

### Continuous improvement:

- **Regular audits:** We conduct periodic audits of our systems to ensure their high quality and effectiveness.
- Improvements and corrections: Based on the results of audits and data analysis, we make continuous improvements and corrections to our algorithms, which allows us to increase the accuracy of detection and shorten the response time.
- Cooperation with experts: We cooperate with experts in artificial intelligence and data analytics to take advantage of the latest technologies and solutions.

#### Human-machine collaboration:

- Team of experts: Our moderators have extensive knowledge of the platform's Terms
  & Conditions and applicable law. As a result, they are able to effectively verify the content identified by automated systems and make decisions in more complex cases.
- **Effectiveness of actions:** The rate of reports concluded by a suspension and the high rating of moderation quality demonstrate the effectiveness of our approach.

**In summary,** our solution combines the high efficiency of automated systems with the experience and knowledge of our experts. This ensures the highest level of security and compliance on the platform, while protecting the interests of our users.

# 6. Determination of the precise purposes for automated measures

The purpose of Allegro's automated content moderation systems is to ensure a safe and legal environment on the platform. These systems are designed to:

- Proactively prevent the publication of content that does not comply with the Terms & Conditions:
  - Suspension of offers: Automatic prevention of listing an offer or adding a review that violates the Terms & Conditions or legal provisions.
  - **Preventive verification:** Proactive scanning of all new offers to detect potential violations of the Terms & Conditions or the law.
- Responding quickly to violations:
  - **Automatic removal:** Immediate removal of offers that have been identified as violating the law or the platform's Terms & Conditions.
  - Account suspension: Automatic suspension of accounts of users who repeatedly violate the Terms & Conditions or take illegal actions.
- Protection against manipulation:
  - Prevention of false reviews: Blocking the ability to post comments or reviews between linked accounts to prevent manipulation of product or seller ratings.
- Financial safeguards:
  - Payout suspensions: Automatic payout suspension for users who are suspected of activities non-compliant with the law or the Terms & Conditions.

With automated content moderation systems, we are able to:

- **Improve platform security:** By minimizing the risk of content non-compliant with the law or the Terms & Conditions.
- **Improve the quality of service:** By providing users with access to reliable information and products.
- **Increase user** confidence: By building the image of the platform as a safe and reliable place for making purchases.
- **Optimize the moderation process:** By reducing the burden on moderators who operate manually, thus allowing them to focus on more complex cases.

# 7. Safeguards applied to the use of automated means

To ensure the highest quality and effectiveness of our automated content moderation systems, we have implemented a number of security and control mechanisms. Our approach includes:

### Development and testing:

- Test environment: Before implementing new rules or algorithms, we conduct thorough tests in a dedicated test environment to verify their effectiveness and exclude potential errors.
- Cooperation of teams: Our content moderation experts, supported by a team of developers, work closely together to create and implement new solutions.

### • Continuous monitoring and optimization:

- **Internal audits:** We regularly audit our systems to identify potential gaps and irregularities.
- Data analysis: We carefully analyze the data on the operation of our systems to draw conclusions and make improvements.
- Monitoring internal signals: We track any signs of potential problems, such as an increase in misclassification or any unexpected behavior of our systems.
- Adaptation to changes: We follow changes in the external environment, including new trends in fraudulent activities, as well as changes in legal regulations, in order to adapt our systems accordingly.

### • Training and education:

- Educational materials: We provide our employees with regularly updated educational materials on the principles of content moderation, requirements related to it, and the operation of our systems.
- Exchange of knowledge: We encourage the sharing of knowledge and experience among team members, which allows for continuous improvement of our processes.

### Procedures and standards:

- Documentation: We have developed detailed procedures for all stages of the moderation process, from creating new rules to solving problems.
- **Standardization:** We apply clearly defined quality standards that allow us to maintain a high quality of moderation.

With these actions, we can be certain that our automated content moderation systems operate effectively and safely, minimizing the risk of errors and ensuring a high quality of service for our users.

## In particular, our systems allow us to:

- Automatically detect and remove non-compliant content: Through the use of advanced algorithms and continuous optimization of our systems.
- Minimize the risk of incorrect decisions: Thanks to thorough testing and regular audits
- Respond quickly to new threats: By following changes in the external environment and continuously improving our systems.

In summary, our approach to content moderation is based on a combination of advanced technologies, the knowledge of our experts, and the continuous improvement of processes and tools. This ensures the highest level of security and quality of our platform.