



April 14, 2026

Via Email

██████████
Officer-in-charge
Special Procedures Branch
OHCHR
Ohchr-registry@un.org

Re: AL OTH 157/2025 Joint Communication from Special Procedures

Dear Special Rapporteur:

I write on behalf of Aylo Freesites Ltd (operator of Pornhub.com and other video sharing platforms) ("**Aylo**") (collectively, "**we**", or "**us**", or "**our**" or "**ours**") in response to your February 13, 2026 letter (the "**Letter**").¹ Aylo has strict policies in place to prevent the production, display, or dissemination of child sexual abuse material ("**CSAM**") or non-consensual content² ("**NCC**") on any of Aylo's platforms. We welcome the opportunity to address your Letter through the lens of our current operations and the extensive measures we have implemented and continue to enhance to ensure platform safety. While many of the allegations reference a timeline that predates Aylo's current ownership, we address each concern on its merits below. Aylo is today committed to establishing and maintaining leading trust and safety practices designed to align with international human rights standards.

Aylo is mindful of the international human rights framework referenced in the Letter, including the United Nations Guiding Principles on Business and Human Rights (A/HRC/17/31). Consistent with the corporate responsibility to respect human rights under Pillar II of the Guiding Principles, Aylo has in place comprehensive safeguards which aim to prevent illegal material from appearing on its platforms and to identify and remove it if it does. These include mandatory uploader and performer ID and consent verification, a ban on content downloads, a rigorous content moderation process utilizing over a

¹ Although the Letter is addressed to Aylo Holdings S.à.r.l. ("**S.à.r.l.**"), the ultimate parent corporation of the relevant entities, S.à.r.l. is merely a holding company, without any employees or operations of its own. Aylo Freesites Ltd has, during the relevant time periods, been responsible for operating Pornhub.com.

² NCC not only encompasses NCII (Non-consensual Intimate Images), commonly referred to as "revenge pornography" or image-based abuse, but also includes any content which involves non-consensual act(s), the recording of sexual material without consent of the person(s) featured, or any content which uses a person's likeness without their consent, *e.g.*, deepfakes.



dozen automated detection tools, a dedicated moderation workforce operating 24/7, and extensive reporting mechanisms, such as a Trusted Flagger Program comprising dozens of non-profit and child protection organizations and public offices across 43 countries. Consistent with Pillar III, Aylo has also established operational-level grievance mechanisms, including its Content Removal Request process and Trusted Flagger Program, to provide access to remedy for individuals who have been harmed. The sections below detail these measures and their application to the specific cases and concerns raised in the Letter.

Aylo Freesites Ltd, as the operator of the Pornhub website, views it as its responsibility to develop and maintain measures to prevent the use of Pornhub for sharing, consuming, or searching for CSAM or NCC. We take all forms of online abuse very seriously and are fully committed to the trust and safety of content creators, users, partners, those depicted on our platforms and Aylo's approximately 1,300 employees and their families. While this letter references Pornhub as Aylo's flagship platform, the verification, moderation, and reporting frameworks described herein apply across all of Aylo's video sharing platforms, including YouPorn and RedTube.

Our commitment is demonstrated by all the actions detailed in this letter and by our cooperation with governments and law enforcement, and partnerships with leading nonprofit organizations such as The Lucy Faithfull Foundation, whose reThink Chatbot we exclusively deploy and which aims at intervening to stop people searching for potential child sexual abuse imagery online, and the Internet Watch Foundation (IWF), whose partnership project with Aylo offers a blueprint for how the adult industry can help in the fight against CSAM online.

1. The Cases of Katelynn Spencer and [REDACTED]

1.1 Katelynn Spencer

The circumstances described in Ms. Spencer's case in the Letter — the non-consensual uploading of intimate content by a third party — represent precisely the type of conduct that Aylo's current operational architecture seeks to prevent.

It is our understanding that the criminal case against the alleged perpetrator was dismissed by the court in March 2022. Contrary to the Letter's assertion that the alleged perpetrator maintains an active account on Pornhub, accounts associated with the alleged perpetrator have been banned since January 29, 2021.

The events described occurred under a fundamentally different platform architecture than exists today. Prior to December 2020, Pornhub operated under a user-generated content model that permitted unverified users to upload content. This



architecture has been completely discontinued and replaced with universal verification requirements that mandate government-issued ID verification for all individual content uploaders, ID and consent documentation for all individuals appearing in their uploaded content, and retroactive application of these standards to all existing content, as further described in Section 2.1. Under Aylo's current system, the risk of third-party, non-consensual uploads is addressed through multiple safeguards: Aylo requires the uploader to have undergone live facial capture and government-issued ID verification and to have verified identification and documented consent on file for all individuals depicted.

1.2 [REDACTED]

Aylo is aware of [REDACTED] situation and the allegations described in the Letter. Upon becoming aware of these allegations, all content featuring [REDACTED] name was identified and removed from Pornhub. The complaint referenced in the Letter was voluntarily dismissed by [REDACTED] without prejudice on June 25, 2021.

The Letter's reference to a "faceless loophole" reflects a fundamental mischaracterization of Aylo's current moderation practices. Rather than representing a loophole, content featuring performers whose faces are not fully visible is subject to a rigorous moderation protocol, including physical feature matching, verification image requirements and mandatory second review by senior moderators, to ensure all performers can be identified. This enhanced moderation process is described in detail in Section 2.2.2. Where any doubt exists about performer identity or consent, content remains offline pending additional documentation, and failure to provide such documentation results in content rejection.

The conduct described in [REDACTED] case predates Aylo's current ownership structure and the comprehensive operational reforms implemented since December 2020. The platform architecture and moderation practices in place when [REDACTED] content was uploaded have been fundamentally restructured to seek to prevent such occurrences.

The Letter references that [REDACTED] content reportedly appeared across more than 200 third-party websites beyond Pornhub's platform. This reflects a broader ecosystem challenge that no single platform can unilaterally resolve, as Aylo cannot control the content policies or practices of independent third-party websites. However, Aylo addresses this challenge through the advanced fingerprinting technology described in Section 2.2.1 below, which detects and facilitates the rejection of re-uploads of previously removed content, including content that has been manipulated.



1.3 Access to Justice, Reparation, and Non-Repetition

Aylo recognizes that effective remedies must be available to individuals who have suffered harm, and we are committed to ensuring access to justice and redress consistent with international human rights standards. We outline below the remediation pathways available and the structural reforms implemented to prevent recurrence of harm for victims.

Aylo has established multiple channels through which individuals who believe they have been harmed by content on our platforms can seek redress, including our Content Removal Request (“**CRR**”) process, video flags, our Trusted Flagger Program, and direct engagement with law enforcement — each described in detail in Section 2.3 below. Our Trust & Safety Center provides dedicated resources for victims of NCC, including guidance on removal procedures, victim support referrals, and information about available reporting mechanisms. Aylo maintains a dedicated legal team to respond to law enforcement requests and has developed a law enforcement portal to facilitate cooperation with criminal investigations and civil proceedings. We respond to lawful process and cooperate with authorities investigating unlawful conduct on our platforms.

Where Aylo has entered into agreements providing for victim compensation — such as the payments to individuals defrauded by GirlsDoPorn/GirlsDoToys referenced in the Eastern District of New York Deferred Prosecution Agreement — we have honored that commitment to those harmed by the criminal conduct of GirlsDoPorn/GirlsDoToys whose content appeared on our platforms.

Additionally, the measures detailed in Section 2 of this letter represent systemic reforms that fundamentally restructure how content can be uploaded, verified, moderated, and maintained on Aylo's platforms. Collectively, these reforms are intended to address concerns described in the Letter regarding NCC and CSAM detection. Aylo views these reforms not merely as compliance measures, but as ongoing commitments to preventing future harm and upholding the rights and dignity of all individuals who interact with our platforms.

2. Aylo's Trust & Safety Architecture

2.1 Identity and Consent Verification

Since December 2020, Aylo has disabled all user-generated content from unverified user accounts. Any individual who wishes to upload content to Aylo's platforms is verified, which means they have provided government-issued identification (“**ID**”). To our knowledge, we were one of the first major online platforms — both adult and mainstream — to adopt this policy and did so voluntarily.



To become a verified individual uploader ("**Model**"), individuals register on the company's content sharing websites (i.e., sites where users may upload their own content directly), they undergo a third-party ID verification process and are subsequently manually verified internally by our employees. Additionally, they must attest to having obtained, verified, and retained ID and consent documents for all performers appearing in content they upload to our platforms.

The Letter references reports that Pornhub removed approximately 91% of its content. Without commenting on the accuracy of that figure, the underlying facts are as follows: Aylo made the decision to require identity verification for all uploaders, as described above. Legacy content published by uploaders who were not verified at that time was removed from the platform, irrespective of whether the content was otherwise compliant with Aylo's Terms of Service. Aylo applied this standard without exception, prioritizing the integrity of its verification architecture over content volume.

As an improvement to the document retention process required from Models for all co-performers, in 2023, Aylo began a multi-year initiative to require records of ID and consent for all performers in Model-uploaded content to be submitted to Aylo.

As of October 16, 2023, Aylo required valid ID information on file at the account level for all performers featured in content uploaded by new Models who registered on or after this date.

As of November 24, 2023, Aylo required valid ID information **and** record of consent to record and distribute on file at the account level for all performers featured in content uploaded by new Models who registered on or after this date.

As of January 23, 2024, the ID and consent requirements for all performers were expanded to all Models' new performers regardless of the registration date of the account and Model.

As of September 3, 2024, Aylo applied the ID and consent requirements retroactively to all existing performers across all Model accounts, requiring existing Models to supplement the ID requirement with the consent requirement for all performers appearing in new content going forward.

Finally, in January 2025, Models were given a deadline of June 30, 2025, to provide consent records for all performers appearing in legacy content. On June 30, 2025, any content for which that requirement was not met for at least one performer, was deactivated.

Today, as a result of these requirements, there is no Model-uploaded content on Pornhub for which we have not received ID and consent for all performers at the account



level. To reiterate, this means that the ID and consent for each co-performer must be provided to and verified by Aylo's moderation team prior to the content being approved for publication. Failing to provide ID and consent documentation or the provision of insufficient documentation results in the rejection of the content.

It is important to note that Aylo's account-level ID and consent verification does not relieve Models of their independent obligation to maintain records in compliance with legal record keeping requirements for adult content. In addition to Aylo's platform-level requirements, our Terms of Service require that Models retain valid identification and documented consent to the production and distribution of content for all co-performers for each individual piece of content uploaded to our platforms. These are complementary but distinct obligations: Aylo verifies performer identity and consent at the account level as a platform safeguard, while Models bear the ongoing responsibility of maintaining per-content records and consent documentation for every upload.

2.2 Content Moderation: Automated and Human Review

Aylo's content moderation framework employs a comprehensive dual-review process combining automated detection technology and dedicated human review. No content is published on our platforms until it has successfully completed both stages of review. The subsections below describe each component of this process.

2.2.1 Automated Review

At upload and prior to being live on our platforms, all content is analyzed by Aylo's robust suite of automated detection tools, described below, which facilitate the identification and prevention of videos containing known or potential CSAM or NCC at the outset. These tools include age estimation and fingerprint detection tools and tools that can detect if a video is known or previously identified CSAM or NCC.

In addition to screening content at the point of upload, our automated detection tools provide additional moderation levels that audit our live sites by proactively scanning previously uploaded content as a further precaution.

These tools include a comprehensive detection, evaluation review, and removal system for potentially illegal material, supported by a suite of technical tools that Aylo has been adding since as early as 2011 and heavily investing in since 2020, and to which we continue to add as technology evolves and new solutions become available. These tools currently include:

- Hashing technology to detect known, previously reported or identified CSAM and NCC using hash-lists provided by several organisations such as



the National Center for Missing and Exploited Children (“**NCMEC**”), the Internet Watch Foundation, Thorn, Offlimits and STOPNCII.org;

- Multiple layers of artificial intelligence tools to detect potential CSAM;
- Audio transcription technology that extracts all audio, transcribes it, and processes it with our banned word tools to flag banned terms to moderators;
- Banned content watermark identification and detection;
- Contextual text moderation which scans comments for multiple bad behaviours; and
- Fingerprinting tools that detect and facilitate the rejection of previously moderated and removed material if re-uploaded. One of these tools is developed in-house and uses our patented, proprietary perceptual hashing technology to detect re-uploads of previously banned material, even if it has been manipulated to circumvent detection.

The specific tools we use include:

- **Vobile’s MediaWise.** Vobile identifies unauthorized content using its own patented digital fingerprinting technology. It uses an exact hash matching algorithm to fingerprint videos and can identify when a video is reposted.
- **YouTube’s CSAI (Child Sexual Abuse Imagery) Match.** CSAI Match uses unique digital signature hash-matching to identify known illegal content. Using CSAI Match, when a match of illegal content is found, it is then flagged for review so it can be responsibly reported in accordance with local laws and regulations.
- **NCMEC Hash Sharing:** NCMEC’s database of known CSAM hashes, including hashes submitted by individuals who fingerprinted their own underage content via NCMEC’s Take It Down service.
- **Internet Watch Foundation (IWF) Hash List:** IWF’s database of known CSAM, sourced from hotline reports and the UK Home Office’s Child Abuse Image Database.
- **StopNCII.org:** A global initiative (developed by Meta & SWGfL) that prevents the spread of non-consensual intimate images (NCII) online. If any adult (18+) is concerned about their intimate images (or videos) being shared online without consent, they can create a digital fingerprint of their own material and prevent it from being shared across participating platforms.



- **Microsoft Photo DNA.** Microsoft Photo DNA creates a hash of an image which is then compared against hashes of other photos to find copies of the same image. Because we compare to a database containing hashes of previously identified illegal images, PhotoDNA becomes an extremely powerful tool to help detect, disrupt and report the distribution of CSAM.
- **Google Content Safety API.** Google Content Safety API classifier assists in classifying and prioritizing billions of images for review. It assesses the likelihood an image contains abusive material, which is helpful to prioritize the moderators' work. Content Safety API issues a prioritization recommendation on content it classifies.
- **Safeguard.** Safeguard is Aylo's proprietary image recognition technology designed with the aim of combatting both CSAM and NCC. It prevents the re-upload of certain fingerprinted content to our platforms. Since March 2021, Safeguard has been capable of fingerprinting and matching videos.
- **Yoti and Incode.** Trusted by a wide range of commercial industries, Yoti and Incode deploy state-of-the-art AI technology, liveness anti-spoofing, and document authenticity checks to thoroughly verify the age and identity of any user registering to become a Model on our platforms.
- **Safer by Thorn.** Safer's Hashing and Matching Services identify existing CSAM by hash matching against its database of known CSAM.
- **Proprietary Age Estimation tools (complemented with Amazon Rekognition).** Content is scanned by our proprietary software to detect faces and estimate ages. When a high-risk face is detected, a second review is done by either Rekognition and the results of these scans are made available to moderators to help them in their review.
- **Active Score AI (previously Spectrum Labs).** Active Score AI uses natural language processing techniques to make sense of text-based data, including video titles, subtitles, tags, user comments, and descriptions. We use it to detect, among other things, mentions or references of anything related to underage, non-consent, revenge porn, doxxing, solicitation of sex, CSAM, and hate speech in comments entered on our platforms.
- **Instant Image Identifier (Offlimits).** The Instant Image Identifier is associated with the three pairs of eyes (3Is) principle, meaning that CSAM images are triple verified in the classification process. Three people (three pairs of eyes) have classified each image. We have implemented this tool



across all our platforms as another layer of protection for our sites, allowing us to check whether uploaded files occur in datasets of known online child sexual abuse material.

- **Transcription Service:** Our transcription service transcribes the audio in uploaded videos to text. Transcribed text is then run against our list of banned words to assist our moderation team in identifying content that may violate our Terms of Service or Community Guidelines.
- **Watermark Detection Service:** We utilize internal proprietary technology to detect watermarks identified in violative content to assist in identifying and removing new or related uploads of this content.

2.2.2 Human Review

Aylo's human review process is a critical component of our content moderation framework. Our moderation team includes dedicated human moderators who undergo an initial three-month training program and subsequent annual training refresher to identify potentially illegal material. We invest heavily in our moderation team, which operates 24/7 to identify content that may violate our Terms of Service.

Once a video has passed through our automated detection tools, it is reviewed in its entirety by a human moderator, including audio, prior to publication on our platforms. As part of this process, a moderator watches and listens to each piece of content in order to make a determination about whether the content may be in violation our Terms of Service, or, in the case of Model-uploaded content, features any additional individuals who are not verified co-performers. Moderators also have access to transcripts of audio from video content to help with their review. Where a moderator has any doubt about the content or any performer(s), they may either reject it or escalate it to a more senior moderator for secondary review.

Models may choose to upload content that does not include their face or the faces of their co-performers due to, for example, a desire to protect their right to privacy. Aylo permits Models and their co-performers to not include their faces or obscure their faces in uploaded content and employs additional moderation processes and safety procedures for such videos in addition to its standard moderation procedures. This process is specifically designed to maintain the safety of Models and performers.

In instances where the Model claims to be in a video, but the Model's face is not visible in that video and cannot automatically be matched with the person whose photograph appears on the ID on file, Aylo's moderators take steps to ensure that the person in the video is indeed the Model. There are several ways of achieving this objective.



For example, the moderator will look to see if there are other videos of the Model in which his or her face is visible. The moderator will see if it is possible to match the person whose face is not visible with the person in the earlier video whose face is visible based on physical features, birthmarks, moles, piercings, tattoos, and other distinguishing traits. The moderator will then verify that the person in the earlier video matches the person whose face appears on the ID. If the moderator is unable to match the Model with the Model's ID, they will request additional information, such as a verification image that includes their face and all or part of the Model's entire body. They will then compare the person whose face is not visible in the video to the verification image to confirm that the person whose face is not visible is the same as the person in the verification image and, finally, will confirm that the same person appears on the ID. This same process is also followed for all other performers, to the extent their face is not visible in the video. If a video does not pass the first moderation check, Aylo does not allow the content to go live. Depending on the content at issue, the account holder may be suspended, pending further investigation, or permanently banned.

Crucial to the moderation process for videos where at least one face is not visible, is that there is a second review. Videos that include one or more performers whose faces are not visible are reviewed again by a senior moderator. If the secondary reviewer has any concern about such a video, they will request additional documentation from the Model while the content is offline. Failure to provide documentation will result in the content being rejected.

Aylo categorically rejects the characterizations of its moderation operations described in the 2021 congressional testimony of Ms. Laila Mickelwait, which do not reflect Aylo's current operational practices. Aylo's moderation program operates without volume targets, quotas, or performance metrics tied to the number of videos reviewed. Moderators are not subject to discipline for the time spent conducting thorough reviews or for removing content where doubt exists regarding compliance with our Terms of Service. To the contrary, our moderators are explicitly directed to reject or escalate content wherever any doubt exists about its appropriateness, performer age, or consent status. As described in Section 2.2 above, all content undergoes both automated screening and human review, including audio review, prior to publication. Aylo's moderation guidelines are comprehensive, consistently applied across all content, and structured to prioritize platform safety and legal compliance over upload volume or processing speed.

2.3 Reporting Mechanisms, Content Removal and Victim Support

Any individual may report content that they believe violates our Terms of Service by submitting a CRR through our online form. Upon validation of the submitter's email



address, the content identified by valid URL is immediately and automatically suspended from public view pending investigation and resolution. Content reported through our Trusted Flagger Program is likewise immediately suspended. All reported content is subject to human review and applicable documented protocol. Registered users may also alert us to potentially violative or illegal material through our content, user, or comment flagging features. Content flagged through these mechanisms is promptly reviewed by our moderation team and subject to appropriate action, including suspension or removal where warranted. All reports are kept confidential, and we review content brought to our attention within a few hours on average. Content does not remain publicly accessible while awaiting the provision of identification or consent documentation under Aylo's current system. Requests from law enforcement are handled by our dedicated legal team through a law enforcement portal, links to which are available on Search.org.

The Letter references allegations regarding reporting thresholds, including a perceived requirement for at least 15 persons to report content before a removal process begins, and a claim that under prior operations, flagged content was only queued for review after receiving 16 or more user flags. These characterizations do not reflect Aylo's current reporting and review system, which operates without any minimum threshold. A single CRR from any individual triggers immediate suspension of the identified content from public view upon validation of the submitter email address, and every user flag is reviewed by our moderation team. A single flag can result in content removal and the permanent banning of the uploader. Aylo's current system is designed to ensure that no report of potentially violative content goes unreviewed.

In 2020, Aylo launched its Trusted Flagger Program, which today enables over 70 public offices and non-profit organisations specializing in CSAM and NCC prevention to alert us to, and immediately disable, content that they believe may violate our Terms of Service. We take all appropriate and necessary action against any content identified by a Trusted Flagger, including human review in all cases. Our Trusted Flaggers also have direct access to Aylo's Trust & Safety team.

2.4 CSAM Detection, Reporting and Prevention

All content that is identified by Aylo as potential CSAM is subject to our CSAM handling and reporting process. We immediately deactivate and ban any user account that uploads potential CSAM and report the user and any content to NCMEC. The offending user's history of interaction with our platforms is also reviewed, as is any other content the user uploads. Any potential CSAM identified in this process is fingerprinted using Aylo's fingerprinting tools to detect and remove it if re-uploaded to our platforms, even if it has been manipulated before re-upload. The Letter alleges that Pornhub failed to report CSAM to law enforcement for over 13 years. Aylo Freesites Ltd is incorporated



in Cyprus. The mandatory CSAM reporting obligations under 18 U.S.C. §2258A are directed at electronic communication service providers and remote computing service providers, and have been primarily applied and enforced with respect to U.S.-based providers. Since April 2020, Aylo has voluntarily reported all identified potential CSAM to NCMEC as part of its commitment to combating the sexual exploitation of minors. Aylo categorically rejects any suggestion that its policy was or is to discourage the reporting of CSAM.

2.5 Visitor Restrictions

Aylo imposes restrictions on how visitors can interact on our platforms. The Letter references a download function that was historically available on Pornhub. As part of the comprehensive platform reforms implemented in December 2020, Aylo disabled the ability for visitors to download Model-uploaded content from its video sharing platforms. This restriction remains in effect today and coupled with the fingerprinting technology described in Section 2.2.1, virtually eliminates the risk of removed content reappearing on the site. To prevent visitors from searching for content that may violate our Terms of Service, we maintain a list of over 44,000 banned or flagged search terms in multiple languages, and Aylo continues to identify keywords to add to its banned keyword list on an ongoing basis. Aylo also regularly monitors search terms within the platform to detect any increase in formulations attempting to circumvent the safeguards in place and adjusts its prohibited keywords accordingly. Banned terms cannot be used in any other user-submitted text fields, such as titles, descriptions, tags, and comments. In addition, when users search for terms associated with CSAM or NCC, Aylo displays global and country-specific deterrence messages designed to intervene and discourage such searches.

2.6 Transparency Reporting

Pornhub publishes semi-annual transparency reports detailing its content moderation results, including the total number of reports filed with NCMEC and other key details related to platform trust and security. Like Facebook, Instagram, Twitter, and other technology platforms, Pornhub strives to be fully transparent about what content should or should not appear on the platform. Our transparency reports are a critical function of open communications and include a detailed breakdown of statistics on moderated and removed material.

Our latest transparency report (for the second half of 2025) can be viewed at <https://help.pornhub.com/hc/en-us/articles/50069808248339-2025-Transparency-Report-Second-Half>.



2.7 Ongoing and Planned Improvements

As shown above, Aylo's multiple layers of content moderation and performer verification are specifically tailored to review all uploaded content in full, with the objective of ensuring that only *legal* content is published on its platforms.

As part of our commitment to establishing ourselves as a leader in trust and safety across both adult and mainstream platforms, Aylo has been implementing further trust and safety measures to strengthen its ID and consent procedures. In particular:

- A. As of November 18, 2025, all Co-Performers receive an e-mail notification when they are added to a Model's account, and another every time they are tagged in a video uploaded to Pornhub. This ensures that Co-Performers are aware of all uploads in which they are featured. If a Co-Performer did not agree to the upload, they are directed to our Content Removal Request form to initiate immediate removal.
- B. As of April 1, 2026, we have deployed features to allow Models to refresh co-performer consent documents. Starting on May 1, 2026, Models will be required to provide updated consent forms for co-performers appearing in future uploads and where the last consent verification is two years or older. This means that Models will not be able to upload new content with a co-performer if it has been 2 years since they provided the last signed consent form for that co-performer. They will have to upload a more recent consent to show that they are maintaining compliance with their record keeping and consent obligations with respect to content uploaded to our platforms.

3. Prevention and Response to Non-Consensual Content

The Letter raises specific concerns regarding the non-consensual sharing of intimate images and the adequacy of platform responses to such conduct. Aylo maintains specific internal policies and procedures designed to detect, prohibit, and respond to the non-consensual sharing of intimate images on its platforms. In addition to the consent verification, content moderation, and fingerprinting measures described in Section 2 above, Aylo's Terms of Service expressly prohibit the uploading of non-consensual intimate content, and violation of this prohibition may result in content removal, account suspension, or permanent account banning depending on the circumstances. Aylo employs multiple layers of detection for NCC, including fingerprinting technology and other hash-matching services that facilitate the identification and blocking of known non-consensual intimate images across participating platforms. Aylo's moderation team is trained to identify indicators of non-consensual content during the human review process, including through audio review and contextual analysis.



In addition to its NCC-specific measures, Aylo maintains policies and tools to address online harassment and cyberstalking on its platforms. Aylo's Terms of Service and Community Guidelines prohibit harassment, doxing, and threats directed at any individual. Our platforms deploy Active Score AI, a natural language processing tool that detects and flags references to harassment, doxing, solicitation, and hate speech in user-submitted text, including comments, titles, tags, and descriptions. Our contextual text moderation system scans user interactions for multiple categories of harmful behavior and flags violations for moderator review. These measures reflect Aylo's recognition that online harassment and cyberstalking disproportionately target women, and that a gender-sensitive approach to platform safety calls for proactive detection and responsive enforcement.

4. Prevention of Violent and Degrading Content

Aylo takes seriously the concerns raised regarding violent and degrading content and maintains specific policies and moderation practices to address it. Aylo's Terms of Service and Community Guidelines prohibit content that depicts violence, coercion, or exploitation. Our moderation team reviews all uploaded content in its entirety prior to publication for compliance with these standards, including audio review, using audio transcription technology that extracts and processes all audio through our banned word tools. Content depicting violence that does not appear to be consensual or that otherwise violates our content policies is rejected during pre-publication review and is not made available to viewers or eligible for monetization on our platforms. Aylo's moderators are trained to distinguish between content that depicts consensual activity between verified adults and content that either depicts, or raises concerns regarding non-consent, coercion, or exploitation, and are directed to reject or escalate any content where doubt exists. In addition, Aylo maintains a comprehensive list of banned search terms in multiple languages, as described in Section 2.5, which includes terms associated with violent or degrading content, to prevent users from searching for such material on our platforms. Uploaders whose content is found to violate these standards are subject to content removal, account suspension or permanent banning, and forfeiture of any revenue associated with the account, so that no financial benefit is derived from the production, distribution, or hosting of such material on Aylo's platforms.

Aylo recognizes the broader societal concerns raised by the Special Rapporteurs regarding the relationship between violent and degrading pornographic content and the dignity, safety, and equality of women and girls. We acknowledge that addressing these concerns requires not only effective content moderation but also an ongoing commitment to ensuring that our content policies and enforcement practices are designed to prevent our platforms from contributing to the normalization of violence



against women. Aylo's content policies reflect this responsibility, and we remain open to engagement with civil society organizations and human rights bodies as we continue to develop and strengthen these policies.

5. Historical Allegations

Several of the allegations referenced in the Letter concern occurrences that predate December 2020, when Pornhub and related platforms operated under both different ownership and a materially different operational and compliance infrastructure than exists today. The comprehensive reforms we have implemented since reflect our commitment to preventing harms today and going forward. Many of the specific allegations raised in the Letter have been addressed in the preceding sections in the context of the relevant operational safeguards. The following subsections address the categories of historical allegations directly and on their merits.

5.1 2024 Investigation by the Office of the Privacy Commissioner of Canada

The Letter draws upon a 2024 investigation by the Office of the Privacy Commissioner of Canada (OPC), which found deficiencies in Aylo's historical identification and consent verification practices, including that documentation was only requested when a video raised concerns during moderation or was flagged after upload, and that uploaders failed to provide required documentation in approximately 70% of cases. These findings reflect practices that have been fundamentally replaced by the comprehensive verification architecture described in Section 2.1 of this letter, under which no individual may upload content without government-issued identification, third-party identity verification, and documented consent for all performers — requirements that have been applied retroactively to all existing content. The OPC's findings, based on their assessment of past practices, do not characterize Aylo's current operations.

5.2 Deferred Prosecution Agreement with the EDNY

We respectfully reject the characterization of the Eastern District of New York Deferred Prosecution Agreement as representing “corporate impunity” or that it reflects any “confessions indicating that Aylo knowingly partnered with and benefited from videos produced by GDP”. Deferred prosecution agreements are a well-established and standard mechanism used by the U.S. Department of Justice to ensure corporate accountability while recognizing cooperative conduct and remedial measures. Most significantly, after an extensive 30-month investigation by the U.S. Attorney's Office for the Eastern District of New York and the FBI, the Government neither found or alleged that Aylo and its affiliates violated any federal criminal laws prohibiting sex trafficking or the sexual exploitation of minors, including child pornography, and no such charges were brought



against Aylo. Simply put, the assertion that “the GDP allegations ... could also be considered a violation of U.S. Code § 1591” is incorrect. The DPA relates solely to a single allegation concerning unlawful monetary transactions with the production company GirlsDoPorn/GirlsDoToys, where Aylo was provided with written documentation purporting to be consent forms that were, unknown to Aylo, obtained through fraud and coercion by the production company. Significantly, the Government expressly acknowledged in the DPA that Aylo’s affiliated company had ceased all monetary transactions with these operators almost four years prior to the commencement of the Government’s investigation. Far from representing impunity, the DPA demonstrates accountability through Aylo’s agreement to an independent third-party monitor to assess its compliance program for three years, providing transparency and oversight. Additionally, Aylo agreed to make monetary payments to individuals defrauded by the production company whose images appeared on Aylo’s platforms, which is the opposite of evasion of responsibility

5.3 Class Action Litigation in the United States Federal Courts

The Letter asserts that certain allegations of wrongdoing against Aylo were “confirmed by the certification of two class action lawsuits by federal judges in U.S. courts....” This is a misstatement of the law. In the federal courts of the United States, class certification is a procedural mechanism to determine whether claims of a group of similarly situated individuals may be tried together in a single legal action that will be binding on all members of the putative class. The class certification orders in the two referenced cases resolved only that procedural question, and did not constitute findings on the merits as to any substantive disputed issues of fact or law. In addition to noting this misstatement of law, Aylo disputes that the Letter’s allegations as to facts supposedly confirmed by class certification fully, fairly, or accurately state any facts pertaining to the issues being litigated in those cases, which remain contested and have yet to be presented to or resolved by any finder of fact.

5.4 Historical Moderation Practices

The Letter references allegations from the 2021 congressional testimony of Ms. Laila Mickelwait regarding Aylo's historical content moderation practices, including claims about moderator staffing levels, review quotas, instructions to retain content regardless of legality, and a threshold requiring 16 or more user flags before content was queued for review. These allegations concern practices that predate Aylo's current ownership and the comprehensive operational reforms implemented since December 2020. Aylo disputes that this testimony fully, fairly, or accurately describes the moderation practices then in effect. Aylo's current content moderation program and reporting mechanisms, as



described in Sections 2.2 and 2.3 of this letter, have been fundamentally restructured and are materially different from the practices described in this testimony.

6. Conclusion

The safety of our community and the trust of our Models, performers, and users are central to Aylo’s operations. We remain steadfast in our commitment to combating CSAM and NCC and we strive to continuously improve our trust and safety policies to better identify, remove, review, and report illegal material

We note that the foregoing response is necessarily a summary based on our current understanding of the matters raised in the Letter, many of which involve unfolding facts and allegations made by third parties that have not been independently verified by Aylo. This response is submitted in good faith and reflects the information available to us at the time of writing. It is not intended to be, and should not be construed as, an exhaustive treatment of each issue addressed, and Aylo reserves the right to supplement or clarify this response as additional information becomes available.

We recognize that combating CSAM and NCC requires a coordinated ecosystem of actors, and Aylo does not act in isolation or in substitution of the other essential participants in this effort, including parents, guardians, governments, and law enforcement agencies. Aylo acknowledges the obligations articulated in the ICCPR, CEDAW, the Convention on the Rights of the Child, and the Palermo Protocol as referenced in the Letter, and is mindful that these instruments inform the standards against which corporate conduct in this space is assessed. While Aylo, as a private enterprise, is not directly bound by obligations incumbent upon States Parties, it is committed to operating in a manner consistent with the principles underlying these instruments. Aylo has taken and is committed to continuing to take its role in this effort and appreciates this opportunity to find a path to work together and take necessary, effective actions to further this common goal.

We remain at your disposal shall you need any further information or clarifications.

Sincerely,

DocuSigned by:


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Chief Legal Officer, 9219-1568 Québec Inc.