Report on the results of the risk assessment for Pornhub.com pursuant to Articles 34 and 28 of the Digital Services Act (DSA)

Aylo Freesites Ltd – April 2026

Pornhub.com (**Pornhub**) is an online platform provided by Aylo Freesites Ltd (**Aylo**). The platform has been designated as a very large online platform according to Article 33 of the Digital Services Act (DSA, Regulation EU 2022/2065) by the European Commission on 20 December 2023. Pursuant to Article 34 DSA, Aylo has identified, analyzed and assessed systemic risks in the Union resulting from, or influenced by, the design and functioning of Pornhub.com and its related systems, including algorithmic systems, or from the use made of the service. In this 2026 risk assessment, Aylo has also incorporated its dedicated minors risk review under Article 28 DSA and the European Commission's Guidelines on measures to ensure a high level of privacy, safety and security for minors online.

This report sets out the results of this combined risk assessment.

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1 Introduction

Aylo has been responsible for the operation of Pornhub for over a decade. Throughout that time, our foremost priorities have consistently been the safety and wellbeing of our performers, our uploaders and our content consuming users, as well as their enjoyment of the content we provide on Pornhub and our other sites. Nothing is more important to us than the safety of our community and the trust of our users. Our core values, such as inclusivity and freedom of expression, are only possible if our platform maintains its safety and integrity and can be trusted by all users that are part of the Pornhub ecosystem. We remain steadfast in our commitment to eliminating all forms of illegal content, including non-consensual intimate material/images and child sexual abuse material. Every online platform shares this responsibility, and it requires collective action, cooperation, and constant vigilance.

Over the years, we have deployed many measures to protect our platform from all forms of illegal and abusive content. We are continually improving our Trust and Safety policies to better identify, remove, review, and report illegal material, both before being made available on Pornhub and our other platforms and once it is reported to us. While leading non-profit and advocacy groups recognize that our efforts have been effective, we understand that our efforts must be ongoing and we constantly strive to innovate and improve. Guided by our progressive, forward-looking, and user-safety-centric approach, Aylo has undertaken its annual assessment of the risks associated with Pornhub, pursuant to Articles 28, 34, 35 of the Digital Services Act (**DSA**; Regulation (EU) 2022/2065) and the Guidelines on measures to ensure a high level of privacy, safety and security for minors online (**the Guidelines**).

2 Updates since our last DSA risk assessment

Since the publication of the previous risk assessment in April 2025, Aylo has implemented several improvements that are relevant to the present risk assessment as further mitigating factors. Fundamentally, Aylo has also revised its risk assessment methodology.

- **New methodology:** Aylo has introduced a revised risk assessment methodology, which is described in detail below. The enhanced methodology in particular allows for the integration of Aylo's dedicated minors risk review pursuant to Article 28 DSA and the Guidelines, and has resulted in certain changes to the way Aylo assesses risks, allowing for a more precise, robust, and targeted analysis. In applying this refined approach, Aylo reinforces its commitment to the diligent identification, assessment, and mitigation of systemic risks associated with Pornhub.

- **Strengthened documentation process for co-performer verification:** To strengthen the documentation of co-performer verification even further**,** Aylo introduced a requirement for all verified uploaders of the Model Program to also

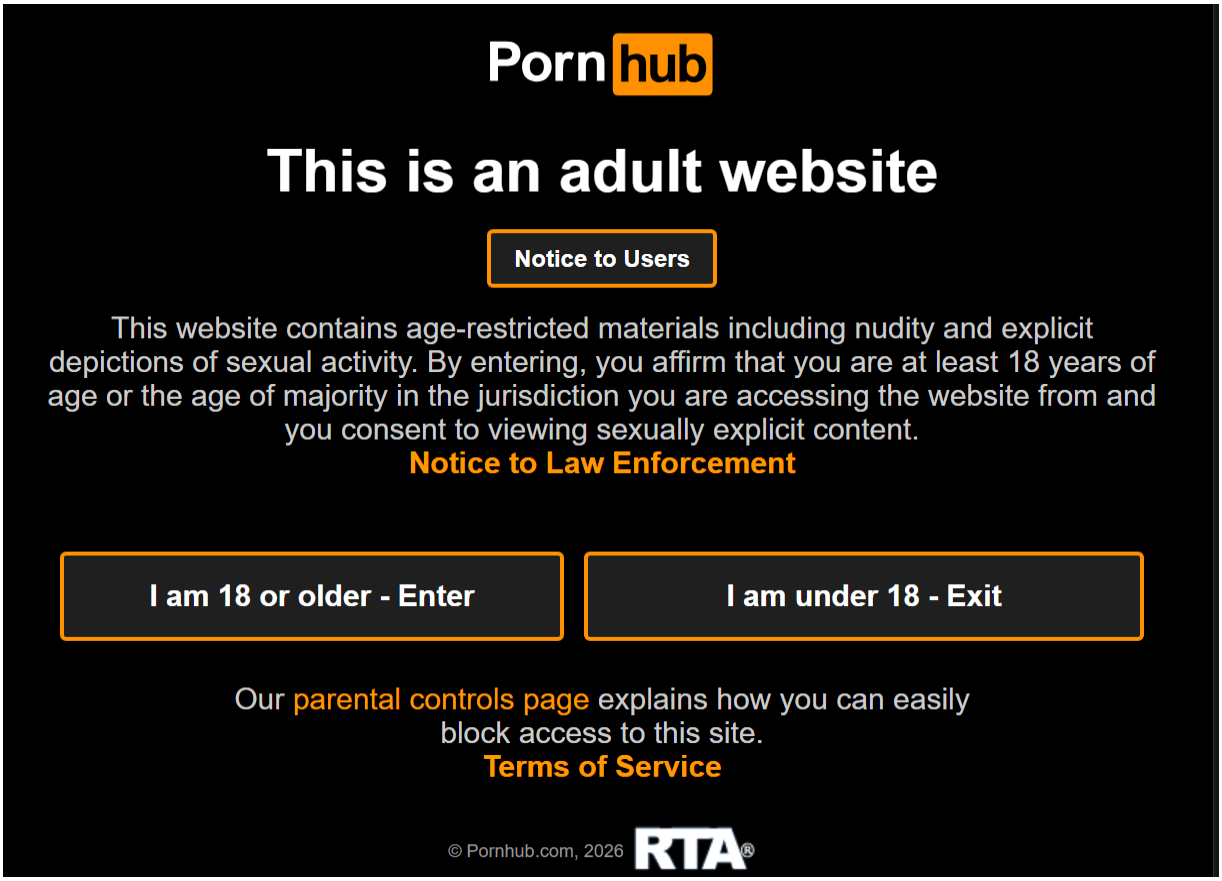
submit valid identification and consent documentation by 30 June 2025 for all co-performers appearing in legacy content they had previously uploaded. Following the expiry of that deadline, any known legacy content that did not meet these requirements has been proactively removed by us from the platform. This policy enhancement reinforces Aylo's existing mitigation framework and reflects industry-leading controls aimed at reducing risk and strengthening compliance standards.

- **Co-performer email notification:** As of 18 November 2025, all co-performers tagged in content uploaded by members of the Model Program receive an email notification with a link to the content upon its publication. Newly added co-performers additionally receive an email notification when they are first added as a co-performer to an account. This initiative enhances transparency for performers who are not registered users of Pornhub and enables them to easily submit a Content Removal Request from the notice, should a co-performer wish to request content removal.

- **CSAM deterrence chatbot:** In collaboration with the Lucy Faithfull Foundation (**LFF**) and Stop It Now Flanders, Pornhub launched LFF's CSAM deterrence for Dutch language speakers in Belgium on 5 August 2025. The chatbot, shown when users attempt to search for terms relating to CSAM on Pornhub, directs users to seek help from Stop It Now Flanders.

- **GenAI mitigation measures:** To address the dynamic developments associated with generative artificial intelligence (**GenAI**), Aylo requires uploaders to declare that content is AI-generated, and to mark it accordingly. Aylo continues to systematically evolve its mitigation measures to respond to both known and emerging threats related to the fast-paced AI developments.

- **Age gate adjustment:** Aylo has modified the presentation of Pornhub's age gate to display the "Enter" and "Exit" buttons for users to choose between in identical design and colouring:



3 Summary of the assessed risks

3.1 General risks

Risk	Inherent risk	Residual risk
Child sexual abuse material (CSAM)	Affected viewers: High	Affected viewers: Medium
Non-consensual content (NCC)	Affected viewers: Medium Affected victims: High	Affected viewers: Low Affected victims: Medium
Doxing and harassment	Affected viewers: Medium Affected victims: Medium	Affected viewers: Low Affected victims: Low
Copyright infringements	Affected right holders: Low	Affected right holders: Lowest

Terrorism	Affected viewers: Medium Affected victims: Medium	Affected viewers: Medium Affected victims: Low
AI-generated content, including deep-fakes, representing illegal acts	Affected viewers: Medium	Affected viewers: Low
Pornography fostering abuse and violence	Affected users: Medium	Affected users: Medium
Hate speech and fostering stereotypes regarding sexual preferences and behaviour	Affected viewers: Medium Affected victims: Medium	Affected viewers: Low Affected victims: Low
Sex trafficking	Affected viewers: Low Affected victims: Medium - High	Affected viewers: Low Affected victims: Medium
Privacy Risks	Affected users: Low Affected registered users: Medium	Affected users: Low Affected registered users: Medium
Politically provocative content and adverts	Affected users: Medium	Affected users: Medium
AI-generated content, including deep-fakes, aimed at spreading false information	Affected users: Medium	Affected users: Medium
Over-blocking	Affected users: Low	Affected users: Lowest
Porn addiction	Affected users: Low	Affected users: Low
Negative effects on relationships	Affected users: Low	Affected users: Low
Frustration due to unrealistic expectations	Affected users: Low	Affected users: Low
Illegal advertising	Affected users: Medium	Affected users: Low
Recommender Systems spreading illegal content	Affected users: Medium	Affected users: Medium

3.2 Risks regarding minors

Risk	Inherent risk	Residual risk
Mental wellbeing: Distress	Children before the age of adolescence: Medium Adolescents: Medium	Children before the age of adolescence: Low Adolescents: Low
Early sexual debut	Children before the age of adolescence: Medium Adolescents: Medium	Children before the age of adolescence: Low Adolescents: Low
Distorted gender norms and sexual objectification	Children before the age of adolescence: Low Adolescents: Low	Children before the age of adolescence: Low Adolescents: Low
Unrealistic expectations about sexual intercourse	Children before the age of adolescence: Medium Adolescents: Low	Children before the age of adolescence: Low Adolescents: Low
Sexual Aggression and acceptance of sexual aggression	Children before the age of adolescence: Medium Adolescents: Medium	Children before the age of adolescence: Low Adolescents: Low
Self-esteem and body image distortion	Children before the age of adolescence: Medium Adolescents: Medium	Children before the age of adolescence: Low Adolescents: Low
Mental health harms: Anxiety / depression	Children before the age of adolescence: Medium Adolescents: Medium	Children before the age of adolescence: Medium Adolescents: Medium

Exposure to illegal or harmful content (not including CSAM)	Children before the age of adolescence: Medium Adolescents: Medium-High	Children before the age of adolescence: Low Adolescents: Medium
CSAM	Affected viewers: - Children before the age of adolescence: Medium-High - Adolescents: Medium-High Affected victims: High	Affected viewers: - Children before the age of adolescence: Medium - Adolescents: Medium Affected victims: Medium
Conduct risk	Affected minors: Medium	Affected minors: Low
Contact risk	Affected minors: Low	Affected minors: Lowest
Consumer risk	Children before the age of adolescence: Low Adolescents: Medium	Children before the age of adolescence: Lowest Adolescents: Low

4 Methodology

Aylo has comprehensively re-assessed and revised its risk assessment framework in accordance with Articles 28, 34, 35 DSA and the Guidelines. As part of its broader revisions, Aylo has integrated the minors-specific risk review under Article 28 DSA and section 5 of the Guidelines into the broader systemic risk assessment it has conducted under Article 34 DSA, as provided for in section 5, paragraph 23 of the Guidelines.

To integrate the two frameworks in a meaningful way that allows for a consistent and holistic assessment of risks and mitigations, Aylo has established an overarching methodology that applies across both parts of the assessment. This holistic approach is complemented by additional tailored methodological components that are specific to the Article 34 DSA risk assessment on the one hand, and to the minors risk review under Article 28 DSA and the Guidelines on the other hand.

Through this integrated and transparent methodology, Aylo reinforces its commitment to high standards of user protection, regulatory compliance, and responsible platform governance, consistent with the objectives of the DSA and the expectations placed on VLOPs with their heightened systemic impact.

Aylo's analysis is consistently evidence-based. It draws on a broad set of quantitative and qualitative inputs, including:

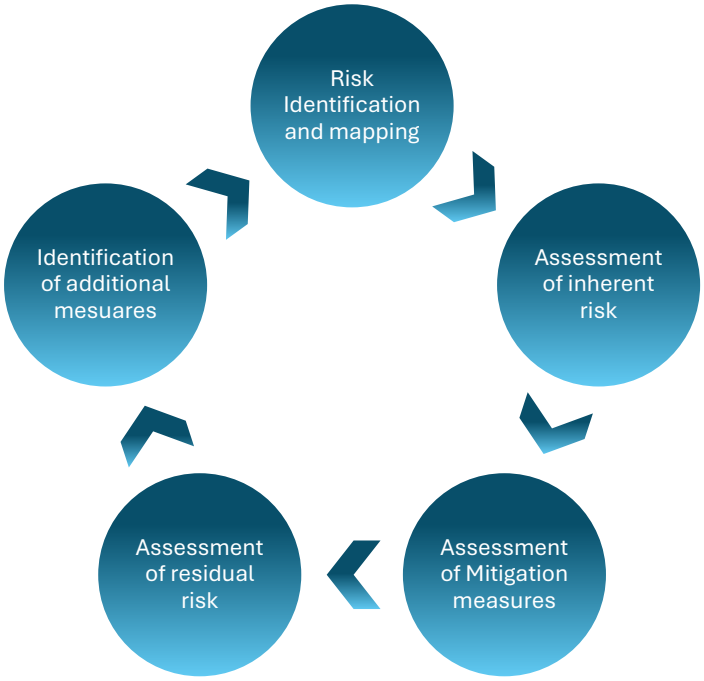
- Independent academic research and peer-reviewed studies relevant to online platforms and digital ecosystem risks. In addition to the studies explicitly referred to in this risk assessment, Aylo has selected and assessed a broader body of relevant research that is representative of the overall risk landscape to ensure a differentiated and nuanced understanding of all risks, and especially of risks affecting minors, with a view to tailoring its risk mitigation measures in a targeted and proportionate manner. [redacted]
- Structured consultations with regulators, civil-society organisations, external experts and relevant NGOs.
- Structured feedback from the content moderation teams to identify recurring risk patterns and emerging trends.
- Continuous ingestion and review of platform-level operational data, including user-report trends, moderation outcomes, and quarterly reviews of enforcement logs.
- In-depth internal knowledge of the platform and market dynamics from the competent teams, including hands-on experience with tools and solutions supporting a holistic approach to the protection of minors for Pornhub and Aylo's other online platforms, with due regard to the unique ecosystem of adult content sharing platforms and user habits generally.
- Benchmarking against industry standards to assess the effectiveness of key safeguards, user-protection measures, and operational performance indicators.

This evidence-based approach supports ongoing compliance with regulatory obligations while reflecting established best practices. It also enables Aylo to identify emerging trends and newly developing risks at an early stage and to respond to them in a timely and proportionate manner.

4.1 Aylo's holistic methodology for the risk assessment

Aylo employs a structured, multi-phased risk review cycle that reflects established industry standards for systemic risk governance. This framework encompasses systematic risk identification, the assessment of inherent risks, a comprehensive evaluation of existing mitigation measures, a subsequent assessment of residual risks, and the determination of additional safeguards where necessary. Each phase is designed to enable a holistic, evidence-based understanding of potential

systemic risks and to support continuous improvement in alignment with the objectives of the DSA.



Aylo's review and assessment of systemic risks is grounded in a holistic review of how risks and corresponding mitigations impact users online. Throughout its operation, Aylo's overarching objective has been to present a safe online environment to its users. Online safety does not stop at the confines of any given platform. This is particularly true and impactful for adult content online, for a number of reasons we set out in detail below and that have their origin in the combination of the omnipresent availability of easily multipliable adult content and the very specific way users behave and guard their privacy and intimacy when seeking out adult content online.

Taking these market realities into account, the only viable approach for meaningfully and sustainably protecting users is to identify, assess and mitigate systemic risks connected to an adult content platform such as Pornhub holistically. Both for identifying and assessing the risks associated with Pornhub and for assessing the need for, and effectiveness of, existing and potential additional mitigation measures, Aylo considers, in the first place, their effects on the Pornhub service, as well as their potential implications for the online ecosystem more broadly.

This holistic approach is not only fundamentally necessary to achieve effective protection of users in relation to risks associated with the dissemination and consumption of adult content online; it is also deeply grounded in the framework and objectives of the DSA to ensure a safe, predictable and trusted online environment, Article 1(1) DSA and Recital 9. To achieve these objectives, Very Large Online Platforms (**VLOPs**), given their reach and influence, are required to

assess the systemic risks stemming from their services and to adopt reasonable, proportionate and effective mitigation measures addressing these risks. On both the level of systemic risks and on the level of effective mitigation measures, a holistic assessment is both prescribed by the DSA and factually without alternatives:

First, when identifying and assessing systemic risks, VLOPs are expected under the DSA to take into account the effects of any systemic risks originating from, or associated with, the VLOP service. By their very essence and definition, systemic risks are those that have implications extending beyond an individual service and that affect the wider online ecosystem and society at large. Risks that remain purely confined to the service itself are merely platform-specific rather than systemic.

While the DSA does not provide a standalone definition, the concept of systemic risk is clearly reflected in the concrete examples set out in Article 34(1)(a)–(d) DSA. The risks enumerated there are, by their nature, not limited to effects confined to the platform level, but encompass broader societal implications and impact. This is particularly evident with respect to negative effects on civic discourse and electoral processes under Article 34(1)(c) DSA, which do never materialize solely within the confines of any given online service.

This interpretation is further reinforced in Recital 76, where it is recognised that very large online platforms and very large online search engines may give rise to societal risks that differ in scope and impact from those associated with smaller services. Taken together, these provisions make clear that systemic risks under the DSA are understood as risks extending beyond the platform itself and affecting the wider online ecosystem and society in the EU at large.

Several other Recitals also emphasize this ecosystem-wide dimension. For instance, Recital 79 explicitly references broader 'safety online' and the shaping of public opinion, while Recital 82 highlights the impacts on democratic processes, civic discourse, electoral integrity, and public security. Acknowledging this broader scope, the DSA also encourages cross-platform cooperation, such as participation in codes of conduct and other self-regulatory mechanisms, see Recital 88.

Looking at specific examples of systemic risks, the European Board for Digital Services (**EBDS**) in cooperation with the European Commission in its first report on the most prominent and recurrent systemic risks as well as mitigation measures inter alia flags risks stemming from the sale of "illegal, non-compliant, or unregulated medical products" on marketplaces. The EBDS notes that such products - including counterfeit cosmetics, toys, and health remedies - create risks that manifest in the physical world when consumers use these products (see page 11 of the report, at https://digital-strategy.ec.europa.eu/en/news/press-statement-european-board-digital-services-following-its-16th-meeting).

To give another stark and very real example: Research has shown that where extremists are banned from mainstream social media, they migrate to other platforms, where the radicalization of the extremists rises (*Tourkochoriti*, 2023, p. 144, https://cjil.uchicago.edu/sites/default/files/2023-07/24ChiJIntlL129.pdf).

In the context of video-sharing services, systemic risks can similarly extend beyond the service on which content is initially made available. Harmful or illegal content may not only reach users on a given platform but may also be further disseminated through re-uploads, embedding, or cross-platform sharing, leading to broader amplification across the online ecosystem. Where platform scale, design features, or dissemination mechanisms contribute to such amplification, these effects must also be taken into account when assessing systemic risks under the DSA.

Second, once systemic risks have been holistically identified and assessed at the next level of **countering the identified risks through effective mitigation measures**, VLOPs again need to consider whether any given measure is effective and proportionate not only at the level of their own platform but also beyond its confines. Where the assessment of risks online places too narrow a focus, mitigation measures are bound to fail in an online environment that allows users to freely move from one site to another without territorial limitations and other offline restraints, such as language and culture. **And if any given measure is exclusively effective on the platform, but directly and causally results in an increase in risk for the same users off platform, the measure has failed. It is not effective, and therefore also cannot be proportionate. Ultimately, it cannot be legally owed since it does not further the objectives of the DSA but frustrates them.**

Furthermore, when determining reasonable, proportionate, and effective mitigation measures, the weighing of all impacted fundamental rights is one of the key criteria, as also underscored in Recital 86. The effective protection of fundamental rights also necessitates a holistic approach that transcends immediate and platform-focused factors. To adequately address fundamental rights implications, the broader ecosystem consequences of any mitigation strategy must be carefully considered and weighed. Consequently, the DSA does not, and cannot lawfully, mandate measures that would merely improve fundamental rights protection for the specific user group of one individual service, and only for the duration of their visit on that service – especially if such measures result in increased risks beyond the platform, thereby reducing the overall level of protection online. Such measures cannot be deemed effective under Article 35 DSA, nor can they be proportionate and required by law.

And finally, this holistic understanding of systemic risks and mitigation measures is also grounded in the requirements set out by the European Commission in the Guidelines. In particular, the Guidelines require providers to assess the "*potential positive and negative effects on children's or other users' rights of any measure that*

the provider currently has in place and any additional measures, ensuring that these rights are not disproportionately or unduly restricted and that positive effects are maximized" (Section 5, paragraph 18(g)). This approach necessitates a holistic assessment, since the appropriateness of a measure cannot be evaluated solely by reference to its immediate effects on the platform itself. Rather, it is also necessary to consider whether a measure may generate broader adverse consequences for users' rights or reduce the overall level of protection by shifting risks beyond the platform itself.

In line with the necessities of this holistic approach, when Aylo evaluates existing mitigation measures, as well as potential additional ones, Aylo assesses whether each measure is capable of meaningfully addressing the relevant identified risk, and whether its scope and intensity are justified by the likelihood and severity of harm. At the same time, Aylo undertakes a holistic balancing of all involved rights and legitimate interests and evaluates potential adverse and unintended consequences. This includes whether a measure could create new risks or shift risks for minors and users off platform, whether it could disproportionately restrict lawful access to information or participation, and whether it could introduce avoidable adverse privacy or data protection impacts.

4.1.1 Risk identification and mapping

Aylo begins the assessment by systematically analysing every component of Pornhub's service that could potentially give rise to user risks. This includes a detailed examination of platform functionalities, content upload processes, and interaction features.

To ensure a robust and fully compliant approach, this assessment is guided by Aylo's comprehensive consideration of the wider European regulatory landscape, including (but not limited to):

- the DSA,
- the Guidelines,
- the General Data Protection Regulation (GDPR),
- and EU laws addressing CSAM, particularly Directive 2021/1232.

This regulatory anchoring ensures that Aylo not only identifies risks inherent to the service but also anticipates emerging obligations and industry best practices.

In the next step, identified risks are categorised using Aylo's risk mapping and evaluation methodology (see below), which provides a structured, coherent and repeatable system for risk mapping and risk evaluation. By mapping risks to

predefined categories, Aylo ensures consistency, transparency and comparability across the entire risk landscape.

Because certain risks may intersect across multiple categories, Aylo conducts an expert analysis to determine the primary category to which each risk is most appropriately assigned. This prevents duplications in the assessment. Despite this categorization, risks are holistically assessed to address each risk through the most effective mitigation strategy.

For example, child sexual abuse material (**CSAM**) qualifies as illegal content, but it also impacts fundamental rights, dignity, mental wellbeing and user safety. Under its methodology, Aylo assigns this risk primarily to the category of illegal content, while ensuring that its broader implications are reflected throughout subsequent analyses.

Category	**Risk**
Dissemination of illegal content	Child sexual abuse material (CSAM)
	Non-consensual content (NCC)
	Doxing and harassment
	Copyright infringements
	Terrorism
	AI-generated content, including deep-fakes, representing illegal acts
	Pornography fostering abuse and violence
Fundamental rights	Hate speech and fostering stereotypes regarding sexual preferences and behaviour
	Sex trafficking
	Privacy Risks
Civic discourse, electoral process and public security	Politically provocative content and adverts
	AI-generated content, including deep-fakes, aimed at spreading false information
	Over-blocking

Gender-based violence, public health, minors, physical and mental well-being	Negative effects in relation to minors, Risk Review under Article 28 DSA
	Porn addiction
	Negative effects on relationships
	Frustration due to unrealistic expectations
Overarching factors	Illegal advertising
	Recommender Systems spreading illegal content

To ensure the timely identification of newly emerging or evolving risks, Aylo maintains robust internal policies and protocols governing escalation pathways for Pornhub. Where a defined trigger threshold is met, the responsible team escalates the matter to the appropriate oversight function, typically either the Trust & Safety team, the DSA team or the Legal team. That function then assesses the issue and determines the appropriate course of action in accordance with Aylo's internal policies and procedures. Depending on the circumstances, this may include the implementation of short-term measures to address emerging risks, the initiation of further review or monitoring, and the adoption of additional responsive measures.

As many of the risks on Pornhub are associated with the upload of user-generated content (**UGC**), the content moderation function plays a central role in the early identification of newly emerging risks. Moderation team members are required to report newly identified risk patterns and incidents promptly to their supervisors in accordance with established internal procedures. This governance structure is designed to support timely escalation, efficient assessment, and effective response to evolving risk trends.

4.1.2 Assessment of inherent risks

The inherent risk represents the baseline risk score of each identified risk before any safeguards or mitigation measures are applied. It reflects the natural exposure associated with a risk in its unmitigated state and forms the analytical foundation for Aylo's broader risk-assessment methodology. Where the same underlying risk affects distinct groups in materially different ways (for example, viewers and victims), Aylo evaluates separate scores to reflect those differences accurately.

Given the robust mitigation measures that have been in place on Pornhub long before the entry into application of the DSA, the assessment of the inherent risk

for each risk category necessarily relies on an informed estimation. To determine a risk-score, Aylo applies a structured risk matrix evaluation, which incorporates several key factors to ensure a nuanced and evidence-based assessment, and which was created by UNICEF to enable companies to identify, prevent and mitigate risks specifically for minors:

- **Scope** – the estimated number of users who could be affected by the adverse impact.
- **Scale** – the severity of the actual or potential impact on affected users.
- **Remediability** – the extent to which those affected can be restored to their original or an equivalent position.
- **Likelihood** – the probability that the adverse impact will occur.

Wherever possible, Aylo bases these factors on **quantitative and qualitative data derived from the operation of its service**. For instance, when a potential risk is directly linked to a specific product feature or user activity pattern, Aylo estimates the number of potentially affected users using relevant service-based indicators.

However, because many users of Pornhub rely on advanced privacy-preserving technologies, such as VPNs and other anonymization tools, service-level data cannot always be considered entirely precise. Recognizing this limitation, Aylo supplements internal insights with scientific research, academic studies, independent reports, and authoritative public data sources to ensure accuracy, consistency, and methodological rigor. Aylo follows a systematic, scientific approach for identifying suitable studies. [redacted]

This strategy allows Aylo to identify an inherent risk score that is both empirically grounded and contextually informed, ensuring the assessment remains robust even where platform-specific data is limited. By combining real-world usage patterns with external research, Aylo delivers a reliable and comprehensive understanding of inherent risk across the ecosystem.

To strengthen the robustness and granularity of its systemic risk evaluation, Aylo has taken into account the methodological framework developed by UNICEF for conducting Child Rights Impact Assessments in digital environments[1]. This internationally recognized methodology enables a more nuanced,

[1] https://www.unicef.org/childrightsandbusiness/workstreams/responsible-technology/D-CRIA.

multi-dimensional and evidence-based analysis of potential impacts on minors than the 6x4 scoring matrix Aylo employed in its previous risk assessment.

By leveraging this approach, Aylo can derive a more precise and differentiated understanding of risk levels, particularly in areas where child safety considerations require heightened scrutiny.

This transition reflects Aylo's commitment to continuous improvement and alignment with leading global standards for child protection, ensuring that the risk evaluation process remains comprehensive, transparent, and responsive to the evolving digital ecosystem.

IMPACT PRIORITIZATION CRITERIA

Scope: How many people (users and non-users) are or could be affected by the adverse impact?

Smallest	Small	Medium	Large	Largest
Slight proportion of the relevant population impacted	Limited proportion of the relevant population impacted	Half / slight majority of the relevant population impacted	Larger majority of the relevant population impacted	Significant majority of the relevant population impacted
1	2	3	4	5

Scale: How serious are, or would the impacts be, for those affected?

Least serious	Moderately serious	Serious	Very serious	Most serious
Unlikely to be associated with adverse impacts, especially on physical, mental or material well-being	Could be associated with adverse impacts, especially on physical, mental or material well-being	Likely to be associated with adverse impacts, especially on physical, mental or material well-being	Likely to be associated with very adverse impacts, especially on physical, mental or material well-being	Certain to be associated with irreversible impacts, especially on physical, mental or material well-being.
1	2	3	4	5

Remediability: Can a remedy restore those affected to the same or equivalent position before the adverse impact?

Remediable	Likely Remediable	Possibly Remediable	Rarely Remediable	Not Remediable
Remedy will return those affected to the same or equivalent position as before the adverse impact occurred.	Remedy is likely to return those affected to the same or equivalent position as before the adverse impact occurred	Remedy may help return those affected to the same or equivalent position as before the adverse impact occurred	Remedy can rarely return those affected to the same or equivalent condition as before the adverse impact occurred	Remedy will not return those affected to the same or equivalent condition as before the adverse impact occurred
1	2	3	4	5

Likelihood: What is the likelihood of the risk materializing, i.e. the likelihood that the underlying event or circumstance giving rise to the risk will occur on the service and lead to the realization of the impact?

Minor Likelihood	Some Likelihood	Moderate Likelihood	High Likelihood	Certain
1-10% chance of occurrence: Although a risk, it is highly unlikely that the risk materializes.	10-40% chance of occurrence: There is some minor risk that the risk materializes.	40-70% chance of occurrence: It is more probable than not that the risk materializes.	70-90% chance of occurrence: There is a high likelihood that the risk materializes.	90-100% chance of occurrence that the risk materializes.
1	2	3	4	5

SALIENCE ASSESSMENT RULES

	SALIENCE SCORE	SALIENCE PRIORITY LEVEL
≥	17	**High**
≥	14	**Medium - High**
≥	11	**Medium**
≥	8	**Low**
>	4	**Lowest**
	N/A	**No risk**

Scope + Scale + Remediability = Severity Score

Severity + Likelihood = Salience Score

Salience Score (4-20) determines Salience Priority Level (Lowest-High)

No risk = 0 % Likelihood

SALIENCE SCORE
(Severity + Likelihood)

		Less Likely		**LIKELIHOOD SCORE**			*More Likely*
		0	**1**	**2**	**3**	**4**	**5**
SEVERITY SCORE ***(Scope + Scale + Remediability)***	**15**	No risk	16	17	18	19	20
	14	No risk	15	16	17	18	19
	13	No risk	14	15	16	17	18
	12	No risk	13	14	15	16	17
	11	No risk	12	13	14	15	16
	10	No risk	11	12	13	14	15
	9	No risk	10	11	12	13	14
	8	No risk	9	10	11	12	13
	7	No risk	8	9	10	11	12
	6	No risk	7	8	9	10	11
	5	No risk	6	7	8	9	10
	4	No risk	5	6	7	8	9
	3	No risk	4	5	6	7	8

4.1.3 Mitigation measures

As a third step in the assessment cycle, Aylo conducts a comprehensive description and evaluation of the mitigation measures in place on Pornhub to address and minimize identified risks. This stage forms a cornerstone of Aylo's commitment to safety, compliance, and continuous improvement. Mitigation measures are continuously evaluated and, where appropriate, improved to provide users with a safe, trustworthy and enjoyable online environment on Pornhub.

The review draws primarily on the extensive suite of safeguards set out in Article 35(1) DSA, complemented by the Guidelines. These measures include, among many others, robust content moderation processes, targeted protections for minors, enhanced reporting and flagging systems, and the deployment of advanced technological tools to detect and prevent illegal and harmful material. These obligations and expectations are also extensively reflected in Aylo's internal compliance documentation.

Aylo systematically evaluates these mitigation measures for their effectiveness, scalability, and alignment with regulatory standards. Using a structured methodology, Aylo assesses how each measure reduces a given risk's scope, severity, and likelihood, drawing on operational data, trust & safety workflows, industry benchmarking, and insights derived from its broader compliance ecosystem.

This assessment enables Aylo to ensure that existing controls remain strong, targeted, and evidence-based, while also identifying areas where further enhancements may be appropriate. By adopting a forward-looking approach, Aylo positions its mitigation framework not merely as a compliance obligation, but as a strategic driver of user protection, trust, and platform integrity.

4.1.4 Assessment of residual risks

The residual risk reflects the level of risk that remains after all existing mitigation measures have been factored into the assessment, essentially representing the actual risk currently present on Pornhub. To determine this score, Aylo again applies its structured risk-matrix methodology, using the same core evaluative factors that guided the inherent risk analysis. This ensures a consistent, transparent, and data-driven approach across all stages of the assessment.

Building on the inherent risk score, the residual risk evaluation captures the measurable impact of Aylo's mitigation measures, enabling a clear understanding of how effectively current controls and safeguards reduce

potential harm. This score serves as a critical decision-making benchmark: it highlights where risks have been sufficiently mitigated and, importantly, identifies areas where additional measures or targeted enhancements should be considered and may be required.

While Aylo's mitigation measures impact risk levels on every dimension, mitigation is particularly measurable on the levels of **likelihood** – reducing the likelihood of the risk materializing at all – and **scope** – reducing the number of potentially affected users. To ensure the coherent and consistent application of the methodology, Aylo generally reflects the overall risk reduction as part of the likelihood assessment, since for most risks, this is the decisive factor in the materialization of harm.

Through this systematic methodology, Aylo ensures that the risk mitigation framework remains both evidence-based and forward-looking, supporting continuous improvement and maintaining a high standard of platform safety.

4.1.5 Identification of additional measures

Building on the outcomes of the residual risk assessment, Aylo adopts a structured, risk-based approach to determine where additional mitigation measures are required and where existing safeguards should be enhanced. In line with established industry practice and proportionality principles as reflected in VLOP risk frameworks, residual risks assessed as medium-high or high trigger the implementation of further targeted mitigations to ensure that potential systemic risks are addressed promptly and effectively.

For residual risks assessed as medium, immediate intervention is not deemed necessary. That said, medium-level risks remain subject to continuous monitoring supported by qualitative and quantitative indicators. This ongoing oversight enables Aylo to detect emerging risk trends at an early stage and to deploy proportionate measures should the risk level increase. In particular, where the overall risk level is only medium, but the risk is assessed as having a high scale (i.e. potentially affecting users to a serious degree in case it should materialize), Aylo applies heightened scrutiny to ensure that effective mitigation measures are continuously maintained and closely monitors for any relevant changes requiring a timely and proportionate response.

This approach reflects Aylo's broader commitment to responsible platform governance, continuous improvement, and alignment with the objectives of the DSA. By systematically reviewing the effectiveness of existing safeguards and proactively identifying areas for enhancement, Aylo ensures that risk mitigation remains dynamic, evidence-based, and responsive to both regulatory expectations and user safety needs.

4.2 Specific methodology for the risk review under Article 28 DSA

For the risk review under Article 28 DSA and the Guidelines, Aylo categorizes the identified risks for minors based on the 5C typology of online risks to children. The 5C typology has been developed by the OECD and provides a framework for categorizing online risks to children in digital environments. Specifically, five areas of risks are described: **Content** (exposure to harmful material), **Contact** (harmful interactions), **Conduct** (engaging in or being subjected to harmful behavior), **Contract/Consumer** (commercial exploitation), and **Cross-cutting** (overarching risks, such as to privacy and well-being).

Risks for children in the digital environment				
Risk categories	**Content**	**Conduct**	**Contact**	**Consumer**
Cross-cutting risks	Additional privacy, safety and security risks Advanced technology risks Risks on health and wellbeing Misuse risks			
Risk manifestation	Hateful content	Hateful behaviour	Hateful encounters	Marketing risks
	Harmful content	Harmful behaviour	Harmful encounters	Commercial profiling risks
	Illegal content	Illegal behaviour	Illegal encounters	Financial risks
	Disinformation	User-generated problematic behaviour	Other problematic encounters	Security risks

OECD. (2021). Children in the digital environment - Revised typology of risks. p.7. https://www.oecd.org/en/publications/children-in-the-digital-environment_9b8f222e-en.htm

Content risks arise from minors being exposed to hateful, age-inappropriate, or illegal material or disinformation. In this context, minors are recipients/viewers of the content. This can include exposure of minors to pornographic content, violent content or CSAM. For the purposes of this assessment, Aylo also includes the risks for minors caused by appearing in CSAM within this category.

Conduct risks arise where a minor is the actor who engages in harmful behavior or is the victim of such behavior by peers. This involves the minor's own interactions and contributions to the creating the risk. This includes, for example, cyberbullying and sexting (in platform environments where direct user interactions are possible).

Contact risks arise from minors being subjected to harmful interaction with other users. This includes adults seeking to establish inappropriate relationships with

minors or peer-to-peer harassment. In this case, minors are the victims or recipients of the actions. This includes cyber grooming or sex trafficking.

Consumer risks are related to the exposure of minors to illegal or inappropriate products or harmful marketing strategies, advertisers using minors' online data without informed consent, financial harm through online fraud or exploitation of minors' lack of commercial literacy, and security harms like free download options containing malware.

Cross-cutting risks are systemic risks that affect a child's fundamental rights and well-being across all categories. These include privacy risks, risks of using and being exposed to AI and other technologies, and risks to physical/mental health. For example, risks can result from increased data collection to determine a user's age and verify their identities or from data breaches collected by AI-based technologies.

5 Description of the Pornhub service

Pornhub is a platform strictly reserved to adult users that are at least 18 years of age, or the age of majority in their respective jurisdiction, as stated at the outset of the Terms of Service at https://www.pornhub.org/information/terms. Users must confirm that they have reached the required age before accessing Pornhub. Minors are neither targeted by Pornhub, nor is the service designed in a way that is attractive to minors. On the contrary, the service is designed to prevent minors from entering Pornhub through a range of measures.

Pornhub operates as a free of charge video-sharing platform that monetizes primarily through advertising on its site. Beyond the sharing and consumption of video content, some limited chat functionalities are available for registered users, as well as the possibility to comment on videos.

The main risk areas therefore derive from the upload and dissemination of UGC that is illegal. To a much more limited extent, risks may also arise from contact and communication features (i.e. the very limited chat functionality and comments on videos). A further central risk category is that pornographic content that is age-inappropriate, and potentially harmful, to minors may be accessed by them. .

An additional category concerns risks that do not directly originate from Pornhub as a video-sharing service, but which the platform may influence indirectly. In particular, the possibility of monetizing content on Pornhub might contribute to the emergence of off-platform risks, for example by incentivizing malicious actors to produce illegal or harmful content for subsequent upload. Another example is the potential onward distribution of illegal or harmful content. Aylo has also taken these risks into account in the assessment and design of its mitigation measures. For the purposes of this risk assessment, Aylo assesses specific manifestations of this

broader off-platform risk to the extent that they are not already captured as part of the individual on-platform risk categories.

6 Governance structure and risk ownership

Aylo maintains a comprehensive risk governance framework in which responsibility for ensuring that identified risks are appropriately mitigated is clearly assigned at the highest levels of the organisation. [redacted] This governance and risk ownership structure reflects Aylo's strong commitment to delivering a safe and trustworthy user experience by placing accountability with the functions that have direct influence over the design, operation, and oversight of the platform.

7 Dissemination of illegal content

7.1 Child sexual abuse material (CSAM)

Recital 80 of the DSA singles out CSAM dissemination as an example of a systemic risk, pointing out that such a dissemination may "constitute a significant systemic risk where access to illegal content may spread rapidly and widely through accounts with a particularly wide reach or other means of amplification". This section addresses only the risks to users arising from exposure to CSAM. For an assessment of the impact on the minors depicted in or being exposed to such material, please refer to **section 10.1.2.3** on the protection of minors.

7.1.1 Inherent risks

Severity Score Assessment of scope, scale, and remediability	**Severity Score: 10**
	Scope - Number of affected viewers: The affected population is anyone who could see the content – either on Pornhub or through potential onward distribution. The overall reach depends on how long the material remains on the site, and on the number of views during that time. Therefore, a significant majority of the relevant population might potentially be impacted. – **Large (4)**
	Scale – Seriousness of the impacts: Scientific studies suggest (e.g. *Gewirtz-Meydan*, 2023, p. 1, https://pmc.ncbi.nlm.nih.gov/articles/PMC10661293/#sec16) that exposure to CSAM correlates with metal health problems, including depressive symptoms and post-traumatic stress disorder – **Serious (3)**
	Remediability: Psychological support can remedy – **Possibly Remediable (3)**
Likelihood The likelihood of the risk materializing	**Certain: 5**
	Given that malicious actors routinely seek opportunities to misuse online services for the dissemination of illegal content, it cannot be excluded that – in absence of any mitigation measures in place on Pornhub - such actors may also attempt to exploit Pornhub for sharing or distributing CSAM. – **Certain (5)**

Overall assessment/ Salience Score	**High: 15**

7.1.2 Mitigation measures in place

7.1.2.1 Policies

The platform maintains a zero-tolerance policy towards any material that sexualizes, sexually exploits, or endangers children on our platform, and we actively work to detect, prevent and remove such material. Our CSAM policy makes this very clear.

7.1.2.2 Identity and consent

There are two types of third-party uploaders on Pornhub: Individual **content creators**, who are members of the Model Program and are also referred to as "**Models**", and **content partners**, who compromise third-party professional content studios and platforms.

As part of their onboarding registration, content partners are required to provide a company name, company/studio content website, and physical address or URL indicating the coordinates of their custodian of 2257 records.

Furthermore, every new uploader is required to undergo identify verification with a third-party identity verification provider, which requires them to:

- Submit a government-issued ID, which is authenticated by the provider.
- Conduct a liveness test to ensure the uploader's likeness matches the government-issued ID and they are one and the same person. The liveness test also ensures that the person is alive and real, not AI, not pre-recorded, not a still image.

At time of onboarding and registration, and again at the time of each upload, all uploaders are required to attest that they have obtained and retained ID and consent to record and distribute content from all other performers appearing in their content.

As part of Pornhub's more extensive verification processes, for Models, these requirements are validated at least once for each additional performer appearing in a given video:

- Uploaders may meet the ID and consent verification requirement for their co-performer(s) in one of the following ways:
    - ID and liveness (biometric) test per above, plus signed consent form upload. Internal moderators review the result of the ID and liveness, and the terms of the consent form.
    - Upload a photo and ID plus signed consent form. ID is validated by a third-party ID validation service, with internal moderators verifying the result of the ID validation, that the face of the co-performer matches the ID, and the terms of the consent form.
    - ID and release form package: upload copies of photo, ID, and signed consent form which is then reviewed by internal moderators, verifying the face of the co-performer matches the ID and the terms of the consent form.
    - eSign (provided by Yoti): co-performer undergoes ID, liveness (biometric) and performs e-signature of consent form. If co-performer ID has been uploaded separately previously, this option also supports reduced steps, with just the liveness and e-signature.
    - Existing Models: Where two or more registered and verified Models feature in the same content, they are able to tag each other through the platform's collaboration feature, requiring affirmative consent.
- All Model co-performers must be approved by a member of the moderation team. Any co-performers appearing in uploaded content are checked by moderators against approved co-performers, to ensure everyone appearing in content uploaded by content creators can be matched to an ID-verified and approved co-performer. If there is any doubt, then further documentation will be requested from the uploader before the content is published. For example, if the content does not feature a face that can be compared to the identity documents, then further images may be required to ascertain that they are the same person. Ensuring that the identity and age of performers are verified and validated before

publication severely limits the risk of potentially illegal material being uploaded.

- As of 18 November, 2025, all co-performers tagged in content uploaded by members of the Model Program receive an email notification with a link to the content upon being published. Newly added co-performers additionally receive an email notification when they are first added as a co-performer to an account. This initiative enhances transparency for performers who are not registered users of Pornhub and enables them to easily submit a Content Removal Request from the notice, should a co-performer wish to request content removal.

- Some older content on the platform fell under a previous policy where each content creator was required to attest to having ID and consent records for co-performers but before the company began validating both requirements for all content prior to its publication. Since then, Aylo announced a 30 June 2025, cut-off date for Models to submit ID and consent paperwork also for co-performers in previously uploaded content: https://www.pornhub.com/blog/2025-consent-and-id-requirement-updates. As this deadline has passed, this risk has been further mitigated by our disabling of known legacy content that did not meet the consent requirement.

- Content partners must first go through an on-boarding process (see **Annex 5 – CPP Onboarding Process v1.2**)

- As it relates to content partners, studio-produced content follows US 2257 record-keeping requirements for age and identify verification. While their website(s) and sample ID and consent paperwork (2257) are audited first at onboarding and annually thereafter, they are not required to provide us with IDs for all performers prior to content publication. This part of the verification process is managed by the studios, and they are required to provide all documentation on demand:

    - Content partners are required to go through a KYC process to validate their identity and business. (see **Annex 4 - KYC Process V1.1**)

    - All content partners go through an annual audit where they are required to provide documentation for a random selection of their content.

- Further information on the verification process can be found in the following documentation:
    - How to Sign Up and Join the Model Program – Pornhub Help
    - PH IDV explainer: Model Program How-Tos (youtube.com)
    - Yoti Tech documentation: Overview - Yoti developer documentation
    - Yoti Demo: Yoti Identity verification
- We have also now added INCODE as an additional identity verification provider.
- This robust process deters and helps to mitigate the risk relating to the upload of illegal material, or committing any illegal acts on the platform

7.1.2.3 Software tools are in place to detect known CSAM before publication

- PhotoDNA scans all images and YouTube CSAI Match scans all videos against hash-lists of known CSAM from the following organisations:
    - The Internet Watch Foundation: Image Hash List - Image Hash List (iwf.org.uk)
    - Thorn: Safer - How CSAM Detection Works | Safer by Thorn
    - National Center for Missing and Exploited Children: Hash sharing - CyberTipline Data (missingkids.org) and Take it Down - Take It Down (ncmec.org)
    - Offlimits: Instant Image Identifier - Offlimits | Home
    - Aylo's own hash databases from Mediawise and Safeguard
- PhotoDNA uses perceptual hashing techniques to scan uploaded content for matches against known CSAM hash-lists – PhotoDNA | Microsoft.

- Matches prevent the content from being published. This reduces the risk of CSAM from being published on the platform.

7.1.2.4 Software tools are in place to assist in the detection of unknown CSAM before publication

- All images and videos are scanned using four similar tools to help detect underage material:
    - Google Content Safety API: Developing and sharing tools to fight child sexual abuse (protectingchildren.google) and in particular the testimonial from NCMEC
    - Thorn's Safer: How CSAM Detection Works | Safer by Thorn
    - Aylo's Age Estimation: Uses a detection model to output an age score estimating the performers age.
    - The IWF's URL List is utilized by the platform to prevent these URLs being referenced on the site.
- Each piece of software scans uploads to ascertain whether a performer appears to be underage. Results of these scans are passed to human moderators to aid moderation of content uploads before publication. We employ different tools because whilst similar, they function in different ways. This ensures a threefold AI check on all uploaded material. If tools believe a performer is underage then human moderators are alerted and will further scrutinize the material to aid in publication decisions. This drastically reduces the risk of CSAM being published on the platform.

7.1.2.5 Human Moderation

- All uploaded images and videos are reviewed by at least one human moderator before being published on the platform. Human moderators check that the ID's provided by uploaders and performers match those within the material. If there are any concerns, then the moderator will reach out to the uploader to supply more information and documentation. Human moderators use the results from all tools to assist them in assessing the content and only publish material once they are confident that the material does not violate our policies and guidelines. Requiring

moderation of all images and videos before publication, severely limits the likelihood of CSAM appearing on the platform.

7.1.2.6 Downloads are not permitted

- Downloads of content from Pornhub are not permitted and no download functionality is made available. This reduces the risk of any illegal content being downloaded and re-distributed on other platforms after takedown from Pornhub, reducing the off-platform harms associated with multiplication and re-victimisation.

7.1.2.7 Fingerprinting illegal material

- All potential CSAM that has been flagged by moderators, either during the upload process, or subsequently removed, is fingerprinted (hashed) using two pieces of software:
    - Mediawise by Vobile – This is based on third-party MD5 flat file hashing.
    - Safeguard by Aylo – This is based on first-party perceptual hashing which can detect manipulated media which may appear different to the original upload. For example, if material is edited in length, has changed in colouring or watermarks have been added, the material is still detected as the same content and prevented from being re-uploaded.
- These fingerprints are scanned before publication. This reduces the risk of previously identified CSAM from being re-uploaded to the platform.

7.1.2.8 Banned Words List

- The platform utilises a database of banned words and phrases, which are prevented from being entered into all user-input fields, including titles, descriptions, tags, playlists, and searches. The database contains words and terms from multiple sources, including NGOs, law enforcement, and the platforms own. Preventing the use of terms associated with CSAM further reduces the risk of CSAM publication.

7.1.2.9 Deterrence messaging

- Searches for words and phrases associated with CSAM in the platform's internal search functionality result in a CSAM deterrence

message being shown and no search results surfaced. A global deterrence message is provided by The Lucy Faithfull Foundation, and many jurisdiction-specific messages are displayed, as provided by local NGOs who specialise in child protection and potential offender behaviour. Deterrence messages direct those who search for CSAM terms in the platform's internal search functionality to seek help from the relevant NGO partner. Deterrence messages also starkly inform the user that the content they are searching for is illegal, children will have been severely harmed in its creation, and that it cannot be found on Pornhub. Deterrence messaging not only deters users from searching for CSAM material, but also informs, educates, and provides help to those who are searching, thereby reducing the risk of users wishing to consume such material in the first place. The successful effects of deterrence messaging are explored in this paper by the Lucy Faithfull Foundation, which also makes express reference to the use of this safeguard on Pornhub.

- [redacted]

7.1.2.10 Chatbot

- In partnership with the Internet Watch Foundation and the Lucy Faithfull Foundation, Aylo launched a chatbot on Pornhub in the UK as their exclusive pilot partner in March 2022. The chatbot seeks to engage with adult pornography users attempting to search for sexual imagery of children. The results from the pilot were evaluated by the University of Tasmania and showed success. In August 2025, Pornhub launched the Lucy Faithfull Foundation's CSAM deterrence for Dutch language speakers in Belgium as the first country in the EU. [redacted]

[redacted]

7.1.2.11 Contextual Text Moderation

- Users can comment underneath content presented on the platform, including videos and blog posts. These comments are moderated using third-party software from [redacted]. The software scans comments in a contextual manner, for multiple bad behaviours including the discussion of CSAM. Any violative comments are reviewed and removed from the site. This further reduces the likelihood of CSAM material, even in written form, from appearing on the platform.

7.1.2.12 De-listing of URLs from search results

- If CSAM material is subsequently removed from the platform, then the URL is provided to search engines to de-list the link and prevent the material (whilst already removed) from appearing in search results of search engines.

7.1.2.13 Trusted Flagger Program

- The platform operates a trusted flagger program comprising [redacted] member organisations who specialise in the removal of CSAM and NCC from the internet. Most are NGOs who receive communications directly from members of the public to report content of themselves or others, that they believe is CSAM or NCC. Some law enforcement entities and government agencies are also part of the trusted flagger program.

- Trusted flaggers can report content for removal directly to the platform and all content reported in this manner is immediately and automatically de-published from the platform, then subsequently reviewed. The program ensures that NGOs can very quickly remove content, therefore reducing the risk of viewing by users of the platform, and limiting the harm to victims.

7.1.2.14 Content Removal Request

- A content removal request (**CRR**) form is linked at the bottom of every page on the platform. Content reported in this manner is

immediately and automatically removed, once the reporter has confirmed their email address.

- The platform also offers an anonymous CSAM reporting form where in line with Article 16 (2)(c) DSA an email address is not required. Material reported in this manner is reviewed within just a few hours and de-published if it is found to violate our CSAM policy. Because of our rigorous pre-publication review (see **sections 7.1.2.2, 7.1.2.3, 7.1.2.4 and 7.1.2.5**), the number of CSAM reports which Aylo processed in the period of this risk assessment was very low.

7.1.2.15 Content Flagging

- The platform also offers another way for logged-in users to flag all images, videos, comments, and users. Content flagged in this manner will be reviewed by a moderator within just a few hours and de-published if it is found to violate our CSAM policy.

7.1.2.16 Advertising

- Our advertising is subject to the same rigorous pre- and post-publication controls as our primary content, comprising the same wide range of moderation tools and human moderation described above.

- All users (logged in or not) can report adverts that they believe contain illegal, inappropriate or copyright material. This is achieved by clicking on the “Ads” portion of the advert in the top right corner and then choosing “Report this Ad”.

- We permit advertising from NGOs who provide services to help change problematic user behaviour (e.g. those looking for CSAM or NCC). This advertising is displayed across our platform in multiple geolocations, including in the EU.

7.1.2.17 Recommender Systems

- Our stringent pre- and post-upload content moderation processes strongly limit the likelihood of any illegal content or “dark places” on the platform. Therefore, choosing one type of content over another is highly unlikely to send a user down a “rabbit hole” to harmful material.

- Deterrence messaging is returned against a large list of banned words associated with certain types of illegal material, so that

users are educated on the particular illegality they have engaged in and can seek help from one of our NGO partners to change their behaviour.

- As detailed in our guidelines, users can turn off personal recommendations by selecting the option in the hamburger menu on the platform, see the Recommender System Guidelines (pornhub.com).

7.1.2.18 Registered user profiles

- Users of the platform can use Pornhub anonymously, i.e. without any registration requirement, or with a registered user account. Registered accounts require email validation, without which accounts cannot be used and are automatically blocked.

- Usernames are scanned using our Banned Words List (see above, **section 7.1.2.8**) to reduce the likelihood of inappropriate terms, in particular those associated with minors or CSAM, being used as part of a username.

- After account creation, registered users cannot upload images or videos unless and until they have conducted an identity verification check (see **section 7.1.2.2** above). No users of the platform who are not verified uploaders, can share any media. The fact that all uploaders have been identified and documented serves as a strong deterrent against the upload and sharing of any illegal content, and including CSAM.

- Our Banned Words List and Contextual Text Moderation also act on comments posted by all registered users.

7.1.2.19 Messaging

- The platform does not allow unregistered users to message anyone on the platform.

- The platform also does not allow registered users to message other users, only content creators.

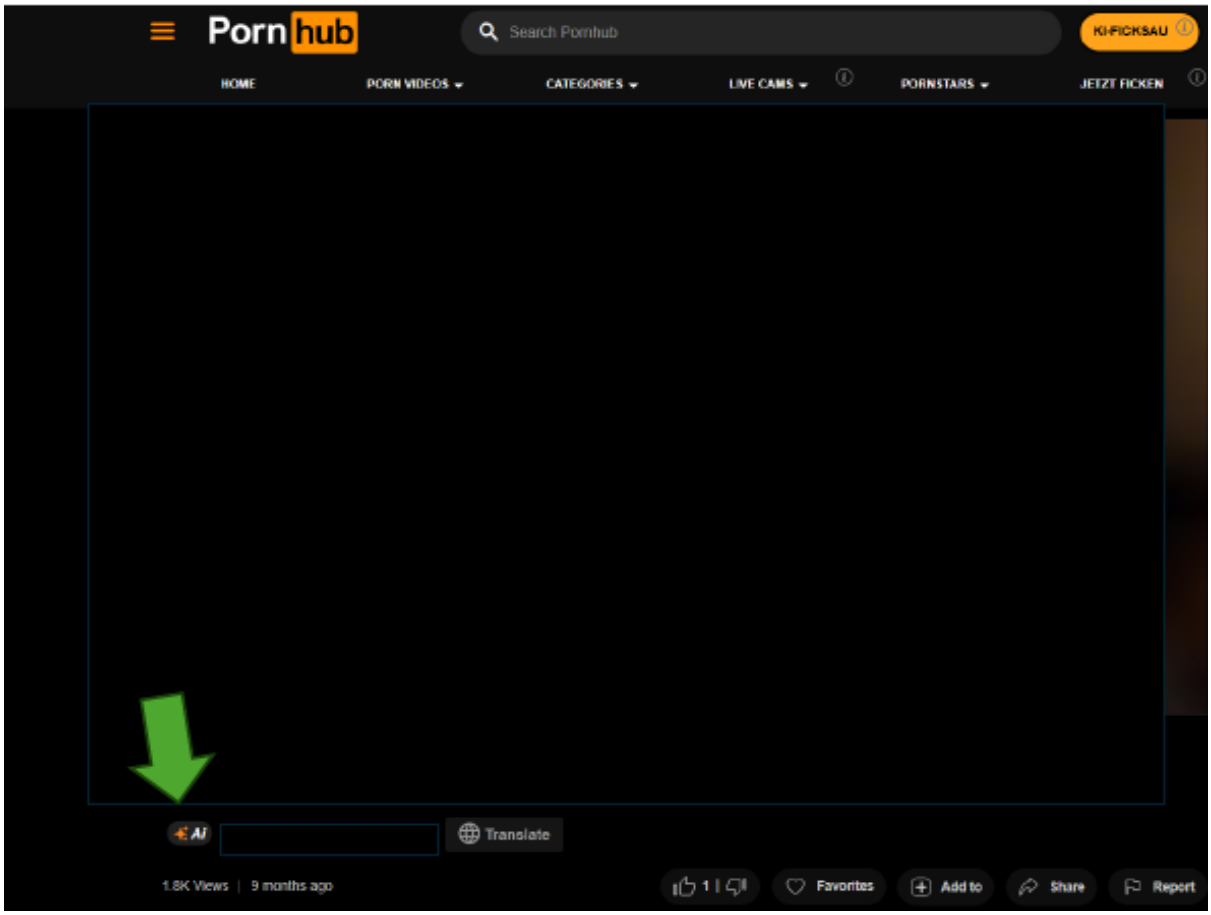
- The platform does not allow images, videos or attachments to be sent through the messaging system.

- All users can be reported for illegal or violative messaging by using the in-built functionality of the platform which can be found in the menu in the top right corner of the chat-window.

These policies, together with the suite of mitigation measures that are in place for all content, severely limit the likelihood that CSAM or CSAM URLs could be communicated via the messaging functionality on Pornhub.

7.1.2.20 Generative Artificial Intelligence (GenAI) content

- According to our guidelines Community Guidelines – Pornhub Help, GenAI content is measured against the same strict standards as regular content.
- When uploading AI-generated content, users are required to self-declare that the content is fully or partially AI-generated. Post upload, such content then features a clear disclosure below the video that it has been partially or fully AI-generated. Content creators that solely upload AI-generated content are required to feature an “AI” badge on their profiles and next to their usernames below all videos.



7.1.2.21 Law enforcement portal

- We host a law enforcement portal so that law enforcement is able to quickly request information from the platform to assist with legal cases.

7.1.3 Residual risk

Severity Score Assessment of scope, scale, and remediability	**Severity Score: 10**
	Scope - Number of affected viewers: **Large (4)** (no changes to inherent risk assessment)
	Scale – Seriousness of the impacts: **Serious (3)** (no changes to inherent risk assessment)
	Remediability: Possibly Remediable (3) (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Minor Likelihood: 1**
	It is highly unlikely that CSAM will be uploaded and disseminated on Pornhub due to the numerous mitigation measures in place. In consequence, it is very unlikely that the risk materializes. Aylo's most recent transparency report shows that only a very small share of uploads contain CSAM and an even smaller share of those uploads were caught after publication; the vast majority was caught pre-publication: *"Of the videos uploaded and reported as potential CSAM in the second half of 2025, which represents 0.11% of videos*

	uploaded during that period, 89.06% were removed before being viewed." *"Videos uploaded in the last six months of 2025 and removed for violating our CSAM policy accounted for 0.002% of total views of all videos uploaded in that period."* Also note in the "IWF Annual Report 2024" (https://www.iwf.org.uk/annual-data-insights-report-2024/) IWF found 291,273 URLs on the web confirmed to contain CSAM. In contrast, **not a single piece of CSAM was found on Pornhub – or indeed on any other of Aylo's platforms since the year 2021.** The NCMEC reports regarding notifications sent by NCMEC to Responsive Service Providers (2021, 2022, 2023, 2024), demonstrates a leading position of Pornhub, with merely 1-3 notifications per year between 2021 and 2023 and no notification in 2024. Compare this to the volumes of notifications sent to other global hosting services and online platforms – which unlike Aylo are not even specifically focused on pornographic content: [redacted] The number of notifications received from NCMEC is low as a positive result of our ever-evolving trust & safety measures and our intensified collaboration with NGOs over the years. In addition, the mitigation measures in place remove incentives for the upload of CSAM to Pornhub and significantly reduce the likelihood of onwards distribution. Since downloads of any content from Pornhub are disabled, a bad actor would have to film or otherwise screen capture a piece of CSAM content for it to be distributed onwards. – **Minor likelihood (1)**
Overall assessment/ Salience Score	**Medium: 11**

7.1.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards. Emerging developments, particularly in the areas of AI and user-generated CSAM, will inform and strengthen Aylo's future mitigation strategy.

7.2 Non-consensual content (NCC)

Aylo's categorizes NCC as including content that was (i) recorded and/or (ii) distributed without the consent of the featured person, that (iii) depicts activities to which an individual did not consent (act) and (iv) content that depicts an individual's likeness without their consent, including deepfakes and other forms of AI-generated content (manipulation).

7.2.1 Inherent risks

Severity Score Assessment of scope, scale, and remediability	**Affected viewers: 9** **Affected victims**: **12**
	Scope - Number of affected viewers: The affected population is anyone who could see the content – either on Pornhub or through potential onward distribution. The reach depends upon how long the material remains on the site and the number of views. Therefore, a significant majority of the relevant population might potentially be impacted – **Large (4)**
	Scope - Number of affected victims: The affected population is anyone who could be displayed in NCC. Scientific studies suggest that worldwide, many people have been victims of image-based sexual abuse, that includes creating, taking or sharing intimate images (e.g. *Umbach, 2025,* https://arxiv.org/html/2503.04988v1). In applying a conservative, over-inclusive approach biased towards a

higher estimate of potential exposure, Aylo assumes that half of the relevant population is impacted. – **Medium (3)**

Scale – Seriousness of the impacts: Affected viewers (overall):

Viewers are affected in different ways depending upon the type of non-consensual content:

- Non-consensual acts: Viewers are likely to be affected due to the nature of the material (e.g. rape) – **Serious (3)**
- Non-consensual recordings: Viewers can be affected, but it may not be obvious that there is no consent to filming (e.g. hidden cameras, which could be faked as hidden) – **Moderately serious (2)**
- Non-consensual distribution (e.g. revenge porn/non-consensual intimate images/image-based sexual abuse): Viewers are unlikely to be affected if they are not aware that those within the content have not consented to its distribution – **Moderately serious (2)**
- Non-consensual manipulation (e.g. deepfakes): Viewers are more likely affected if they are aware of the individuals being subjected to deepfakes – **Serious (3)**

Based on these single risk scores, Aylo applies an overall score to ensure a consistent assessment. This score is based on the individual scores and an average is determined and then rounded up to adequately account for the higher risk. – **Serious (3)**

Scale – Seriousness of the impacts: Affected victims: Victims of all types of NCC are likely to be highly affected by the distribution of the material – **Most serious (5)**

Remediability: Psychologic support can remedy for both viewers and victims. Also, removal can remedy, but will not remove, the negative impact on those who saw it or those depicted in the content.

	• For viewers that might not even be aware that content is NCC - **Likely remediable (2)** • For victims - **Rarely remediable (4)**
Likelihood The likelihood of the risk materializing	**For viewers: Moderate likelihood - 3** **For victims: Certain - 5**
	Given that malicious actors routinely seek opportunities to misuse online services for the dissemination of illegal content, it cannot be excluded that – in absence of any mitigation measures in place on Pornhub - such actors may also attempt to exploit Pornhub for sharing or distributing NCC. Based on this finding, Aylo views the materialization of the risk • For viewers – **Moderate likelihood (3)** • For victims **- Certain (5)**
Overall assessment/ Salience Score	**Affected viewers: Medium – 12** **Affected victims**: **High** – **17**

7.2.2 Mitigation measures in place

7.2.2.1 Identity and consent

- As set out in **section 7.1.2.2,** Aylo maintains industry-leading mechanisms to ensure that the identity and consent of uploaders are confirmed.

7.2.2.2 Withdrawal of consent

- Performers who previously consented to the distribution of content on the platform can withdraw their consent at any time. This will result in the content being removed from the platform and can be reported via the CRR or by contacting our support team.

7.2.2.3 Software tools are in place to detect known non-consensual intimate images (NCII) before publication

- PhotoDNA scans all images, and YouTube CSAI Match scans all videos, against hash-lists of known NCII from the following organisation:
    - STOPNCII.org (part of the Revenge Porn Helpline)
- Matches prevent the content from being published. This reduces the risk of NCII from being published on the platform.

7.2.2.4 Human moderation

- As set out in **section 7.1.2.5**, Aylo maintains industry-leading human moderation procedures.

7.2.2.5 Downloads are not permitted

- Downloads of content are not permitted on Pornhub, as lined out in **section 7.1.2.6**.

7.2.2.6 Fingerprinting illegal material

- All NCC that has been flagged by moderators, is fingerprinted (hashed) as set out in **section 7.1.2.7**.

7.2.2.7 Banned Words List

The platform utilizes a database of banned words and phrases, which are prevented from being entered into all user-input fields, as set out in **section 7.1.2.8**.

7.2.2.8 Deterrence messaging

- Searches for words and phrases associated with NCC and within the platform's database, result in an NCC deterrence message being shown and no results surfaced. A global deterrence message is provided by the Cyber Civil Rights Initiative in the United States of America, and many jurisdiction specific messages are displayed, as provided by local NGOs who specialise in NCC removal and victim support. Deterrence messages inform the user that what they are searching for is illegal and it cannot be found on the platform. Users are directed to NGOs who can help them if they are the victim of such material, and how to remove it if it appears on the platform or on other sites, via NGO resources. Deterrence messaging not only prevents users from searching for NCC material, but also informs, educates, and

provides help to those who are searching. Reducing the risk of users wishing to consume such material in the first place.

7.2.2.9 Contextual Text Moderation

- The platform uses software that scans comments in a contextual manner for multiple bad behaviors, as set out in **section 7.1.2.11**.

7.2.2.10 De-listing of URLs from search results

- If NCC material is subsequently removed from the platform then the URL is provided to search engines to de-list the link, as set out in **section 7.1.2.12**.

7.2.2.11 Trusted Flagger Program

- Pornhub operates a trusted flagger program comprising [redacted] members who specialise in the removal of CSAM and NCC from the internet, as set out in **section 7.1.2.13**.
- [redacted]

7.2.2.12 Content Removal Request

- A content removal request (**CRR**) form is linked at the bottom of every page on the platform. All visitors to the platform can use the CRR form to report NCC material by providing the URL of the content, the reason why it should be removed, and an email address so that the platform can communicate with the reporter, ask for more detail if required, and confirm our decision. Content reported in this manner is immediately and automatically removed, once the reporter has confirmed their email address. This reduces the risk of viewing NCC material and limits harm to victims.

7.2.2.13 Content Flagging

- The platform offers another way for logged-in users to flag all images, videos, comments, and users. Content flagged in this manner will be reviewed by a moderator within just a few hours and de-published if it is found to violate our NCC policy.

7.2.2.14 Image-based Sexual Abuse Principles

- After the White House issued a Call to Action to Combat Image-Based Sexual Abuse for tech and civil society on 23 May 2024, the Center for Democracy and Technology (CDT), the Cyber Civil Rights Initiative (CCRI), and the National Network to End Domestic Violence (NNEDV) invited civil society organizations and tech industry leaders to a multistakeholder working group ("Working Group") focused on combating Image-Based Sexual Abuse.

- Aylo participated in this working group, which worked to create a set of principles, which were published in September 2024. We are proud of our continued work to prevent non-consensual content and hope that more organisations will sign-up to these voluntary principles.

7.2.2.15 Law enforcement portal

- We host a law enforcement portal through which all law enforcement bodies can communicate with us, as set out in **section 7.1.2.21**.

7.2.2.16 Generative Artificial Intelligence (GenAI) content

- Pornhub has several mitigations in place addressing GenAI content, as set out in **section 7.1.2.20**.

7.2.3 Residual risk

Severity Score Assessment of scope, scale, and remediability	**Affected viewers: 9** **Affected victims: 12**
	Scope – Number of affected viewers: **Large (4)** (no changes to inherent risk assessment)
	Scope - Number of affected victims: **Medium (3)** (no changes to inherent risk assessment)
	Scale - Seriousness of the impacts for affected viewers (overall): Serious (3) (no changes to inherent risk assessment)
	Scale - Seriousness of the impacts for affected victims: **Very serious (4)** (no changes to inherent risk assessment)

	Remediability: • **for viewers - Likely Remediable (2)** (no changes to inherent risk assessment) • **for victims - Rarely Remediable (4)** (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Minor Likelihood: 1**
	As our most recent transparency report shows, only a very small share of uploads contain NCC and an even smaller share of those uploads were removed after publication, and thus reached an audience on the platform. *"Of videos both uploaded and removed for violating our NCC policy in 2025 from July through December, which represents 0.05% of videos uploaded during this time, over 87% were removed before being viewed."* *"Videos uploaded in the last six months of 2025 and removed for violating our NCC policy accounted for 0.005% of total views of all videos uploaded in the second half of 2025."* Whilst the mitigation measures we have in place make it unlikely that the platform will be used to commission or facilitate the distribution of NCC, it remains a risk that bad actors could attempt this. The mitigation measures remove incentives for the upload of NCC to Pornhub and significantly reduce the likelihood of onwards distribution, not least because downloading content from the platform is not enabled. As supported by the statistics in our transparency report, referenced above, the likelihood of success for bad actors is low. – **Minor Likelihood (1)**
Overall assessment/ Salience Score	**Affected viewers: Low - 10** **Affected victims: Medium – 13**

7.2.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards. Emerging developments, particularly in the areas of AI and user-generated NCC, will inform and strengthen Aylo's future mitigation strategy.

7.3 Doxing and harassment

Doxing and harassment risks arise from the intentional disclosure, aggregation, or dissemination of an individual's personal or identifiable information - whether obtained lawfully or unlawfully - with the purpose or foreseeable effect of intimidating, harassing, threatening, or coercing that individual.

This category also includes targeted or coordinated abusive conduct that exploits such information to cause psychological harm or reputational damage.

7.3.1 Inherent risks

Severity Assessment of scope, scale, and remediability	**Affected viewers: 8** **Affected victims: 9**
	Scope - Affected viewers: The affected population is anyone who could see the content. The reach depends upon how long the material remains on the site and the number of views. Therefore, a significant majority of the relevant population might potentially be impacted. – **Large (4)**
	Scope - Affected victims: Affected victims can mainly be performers and users with user profiles. Of all individuals who could potentially create user accounts and register as performers, the number of potentially affected people is limited to a small proportion of actually registered users or performers – **Small (2)**
	Scale - Affected viewers: The harm to users through seeing harassment is limited, unless they know the victim,

	which is unlikely. Doxing on the platform can make users feel uneasy that the platform is not safe. – **Moderately serious (2)**
	Scale - Affected victims: Harm to victims of doxing/harassment could be severe depending upon the nature of the threats and the personally identifiable information (PII) revealed. – **Very Serious (4)**
	Remediability: Psychologic support can remedy for both viewers and victims. Removal can help remedy, but will not remove the negative impact on the victims. • For viewers – **Likely remediable (2)** • For victims – **possibly remediable (3)**
Likelihood The likelihood of the risk materializing	**Moderate Likelihood - 3**
	In the absence of mitigation measures, it cannot be excluded that malicious actors may seek to misuse Pornhub for doxing and harassment. However, the likelihood of such misuse is generally lower than on social media, because social media's public-facing publishing functionalities and networked amplification features make it materially easier for users to disclose personal information, coordinate harassment, impersonate others, and repeatedly target individuals across accounts and services. By contrast, Pornhub is primarily a content-hosting service rather than a social-interaction service and does not facilitate such conduct in the same way. – **Moderate likelihood (3)**
Overall assessment/ Salience Score	**Affected viewers: Medium - 11** **Affected victims: Medium - 12**

7.3.2 Mitigation measures in place

7.3.2.1 Resources for performers

- Guidelines are given to performers to help them understand how to protect their identity. This includes:
    - Educational blog posts with best practices for safety and security measures are published frequently, including: https://www.pornhub.com/blog/increased-security-for-your-pornhub-account, https://www.pornhub.com/blog/tips-on-how-to-manage-account-security-and-safety and https://www.pornhub.com/blog/beware-of-phishing-scams-targeting-models
    - Monthly newsletters are circulated when new security features become available on the platform
    - Campaigns with 3rd party performer advocacy groups are in the works to share tips and knowledge on how performers can protect their address and other PII when filming content in their home – Cupcake Girls and Pornhub Announce New Partnership
    - Pornhub 101 series published for both users and models explain compliance and community elements of the platform
    - Cyber Safety: A Model's Guide to Digital Protection – a new series of posts created in Q4 2025 which help educate performers on how to stay protected.
        - Cyber Safety: A Model's Guide to Digital Protection Part 1
        - Cyber Safety: A Model's Guide to Digital Protection Part 2
        - Cyber Safety: A Model's Guide to Digital Protection Part 3

7.3.2.2 Identity and consent

- As set out in **section 7.1.2.2,** Aylo maintains industry-leading mechanisms to ensure that the identity and consent of uploaders are confirmed.

7.3.2.3 User profiles

- The information displayed on user profiles is limited and set by the user themselves.
- Two-factor authentication is available to all content creators on the platform to limit the likelihood of unauthorised access.
- Usernames cannot be edited by a user. Content creators can change their username and stage name once per month without contacting a support agent.
- A user harassing a content creator is mitigated by the content creator's ability to report the user, who would be actioned by the support team.
- Content creators can also contact our support team directly if a pattern of bad behaviour occurs.

7.3.2.4 Fake user profiles

- As noted in the messaging section (see **section 7.1.2.19**), user-to-user messaging is not possible on the platform, therefore limiting the risk of users being harassed or contacted by other users.

7.3.2.5 Contextual text moderation

- The platform uses software that scans comments in a contextual manner for multiple bad behaviors, as set out in **section 7.1.2.11**.

7.3.2.6 Content flagging

- The platform offers a way for logged-in users to flag all images, videos, comments, and users. Content flagged in this manner will be reviewed by a moderator within just a few hours and de-published if it is found to contain PII or doxing/harassment. Performers can flag users for doxing and threats to the Model Support team. These are reported to the Trust & Safety team to determine if there is an imminent threat, and they will take who will take the appropriate action. In most cases, the user is banned for violating our Terms of Service. This reduces the risk of viewing material and limits harm to victims.

7.3.2.7 Messaging

- Aylo has taken several measures to ensure that the messaging function is safe and trustworthy, as set out in **section 7.1.2.19**.

7.3.2.8 Law enforcement portal

- We host a law enforcement portal through which all law enforcement bodies can communicate with us, as set out in **section 7.1.2.21**.

7.3.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Affected viewers: 8** **Affected victims: 9**
	Scope - Affected viewers: **Large (4)** (no changes to inherent risk assessment)
	Scope - Affected victims: **Small (2)** (no changes to inherent risk assessment)
	Scale - Affected viewers: Moderately serious (2) (no changes to inherent risk assessment)
	Scale - Affected victims: Very serious (4) (no changes to inherent risk assessment)
	Remediability: For viewers – **Likely remediable (2)** (no changes to inherent risk assessment) For victims – **Possibly remediable (3)** (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Minor Likelihood - 1**
	As our most recent DSA Transparency Report shows, harassment, stalking, and threats of abuse is limited to a small number of instances. Of all moderation measures (upon notice by a user or by own initiative) taken by Aylo in 2025 from July through

	December, only 1 case falls within the category cyber harassment. Pornhub does not facilitate such behaviour in a way that other platforms may, for example, user to user messaging is not possible, user to content creator messaging is restricted, and there are no user location sharing functions. That said, there is a slightly higher risk to content creators, and we therefore take their welfare seriously as shown in the mitigation measures. - **Minor likelihood (1)**
Overall assessment/ Salience Score	**Affected viewers: Low - 9** **Affected victims: Low - 10**

7.3.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

7.4 Copyright infringements

Copyright infringement risks include unauthorised use, reproduction, distribution, public display, or making available copyrighted works in violation of the exclusive rights of the rights holder. For viewers, there is no specific risk.

7.4.1 Inherent risks

Severity Assessment of scope, scale, and remediability	**Affected rights holders: 6**
	Scope – Affected rights holders: Potentially affected rightsholders are mainly other websites. creators and professional studios, as well as professional film makers. – **Small (2)**

	Scale – Affected rights holders: The scale of the risk depends upon the nature of the copyright material. • If material from another website (e.g. [redacted] is concerned, then violations are more harmful than distribution of professionally produced material. • If material from a Hollywood movie or professionally produced material is concerned, then the risk of harm is low. **Moderately serious (2)**
	Remediability: The damage can be remediated as once the material has been removed, the infringement ceases. Removal, potentially combined with damages payment, can remedy to a high degree and restore the prior situation – **Likely Remediable (2)**
Likelihood The likelihood of the risk materializing	**Moderate likelihood - 3**
	It cannot be excluded that malicious actors may seek to misuse Pornhub for unauthorized dissemination of copyright-protected content. – **Moderate (3)**
Overall assessment/ Salience Score	**Affected rights holders: Low – 9**

7.4.2 Mitigation measures in place

7.4.2.1 Identity and consent

- As set out in **section 7.1.2.2,** Aylo maintains industry-leading mechanisms to ensure that the identity and consent of uploaders are confirmed.

7.4.2.2 Software tools are in place to detect known copyright material before publication

- There are two repositories of Vobile hashes:
    - Hashes of content which violates our terms of service
    - Copyright content hashes.
- Exclusive model content is automatically fingerprinted by Vobile in the latter repository. If that content is uploaded by a different model in the future, the content will automatically be set to infringing copyright status.

7.4.2.3 Human moderation

- As set out in **section 7.1.2.5,** Aylo maintains industry-leading human moderation procedures.

7.4.2.4 Downloads are not permitted

- Downloads of content are not permitted on Pornhub as set out in **section 7.1.2.6**.

7.4.2.5 Fingerprinting illegal material

- All copyright material (produces by exclusive models) that has been flagged by moderators, is fingerprinted (hashed) as set out in **section 7.1.2.7**.

7.4.2.6 Tailored reporting forms

- Pornhub has DSA compliant content removal forms to report copyright infringements (alongside any other form of illegal content). Additionally, we prevent and enforce against copyright infringements globally with tailored processed and forms that take special requirements of non-EU jurisdictions into account. Pornhub also has a dedicated page on DMCA removals linked at the bottom of every page on the platform. Rights holders can use the DMCA form to report copyright material by providing the URL of the content, a description of the work being infringed, and full contact details. Content reported in this manner is reviewed by the DMCA team and investigated for removal. This reduces the risk of copyright material and limits harm to victims globally.

7.4.3 Residual risk

Severity	**Affected rights holders: 6**

Assessment of scope, scale, and remediability	
	Scope – Affected rights holders: **Small (2)** (no changes to inherent risk assessment)
	Scale – Affected rights holders: Moderately serious (2) (no changes to inherent risk assessment)
	Remediability: **Likely Remediable (2)** (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Minor likelihood - 1**
	As reflected in Aylo's most recent DSA Transparency Report, copyright infringements occur only in a very limited number of reported or proactively detected cases. In total, Aylo received 183 notices concerning potential intellectual property infringements and proactively identified a further 39 instances. When viewed against the approximately 1.09 million pieces of content uploaded to Pornhub between July and December 2025, these figures represent a comparatively negligible proportion. These numbers indicate that the likelihood of any riks materializing on Pornhub is minor. – **Minor likelihood (1)**
Overall assessment/ Salience Score	**Affected rights holders: Lowest - 7**

7.4.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

7.5 Terrorism

Terrorism risks arise from the creation, dissemination, or amplification of content that promotes, glorifies, or provides propaganda for terrorist organisations or terrorist acts.

7.5.1 Inherent risks

Severity Assessment of scope, scale, and remediability	**Affected viewers: 10** **Affected victims**: **9**
	Scope - Number of affected viewers: The affected population is anyone who could see the content – either on Pornhub or through potential onward distribution. The reach depends upon how long the material remains on the site and the number of views – **Large (4)**
	Scope - Number of affected victims: The number of victims is very limited. – **Smallest (1)**
	Scale – Affected viewers: The scale of the risk depends upon the nature of the content. Content could be videos propagating terrorist acts or showing such. **- Serious (3)**
	Scale – Affected victims: The scale of the risk for victims depends upon the nature of the content. Where content depicts harm involving identifiable victims, exposure to such material can cause significant psychological distress. – **Very serious (4)**
	Remediability: Removal can remedy, but will not remove the negative impact on those who saw it or those within it. • For viewers **- Possibly remediable (3)** • For victims **- Rarely remediable (4)**
Likelihood The likelihood of the risk materializing	**Some Likelihood - 2**

	Pornhub does not, by its nature, provide features that are typically conducive to the effective dissemination or broad amplification of terrorist content. Therefore, it is overall rather unlikely that the platform is misused for spreading terrorist content. However, it cannot be excluded that malicious actors may seek to misuse Pornhub for spreading terrorist content. – **Some Likelihood (2)**
Overall assessment/ Salience Score	**Affected viewers: Medium - 12** **Affected victims: Medium – 11**

7.5.2 Mitigation measures in place

7.5.2.1 Identity and consent

- As set out in **section 7.1.2.2,** Aylo maintains industry-leading mechanisms to ensure that the identity and consent of uploaders are confirmed.

7.5.2.2 Membership of Tech Against Terrorism

- PH is a member of Tech Against Terrorism's mentorship program – Tech Against Terrorism | Disrupting Terrorist Activity Online which mentors platforms in preventing the dissemination of terrorist material, giving access to threat intelligence, OSINT briefings, and a knowledge sharing platform.

7.5.2.3 Terrorist Content Online Regulation compliance

- We comply with the Terrorist Content Online Regulation in the EU, requiring immediate takedown of any material reported by the relevant authorities, as noted in our Terms of Service. *"For any removal orders pursuant to Regulation (EU) 2021/784 (the "Terrorist Content Online Regulation" or "TCO"), designated competent EU authorities can complete our removal form. After submission of this form, you will receive further instructions by e-mail, which you may respond to with a removal order. For such removal orders, please use the template provided in Annex I of the TCO and conduct all communication in either English or Greek."*

7.5.2.4 User profiles

- Profile pictures are treated as uploaded images, per our moderation process and are therefore moderated via tools and humans to ensure they do not breach our Terms of Service.
- Usernames are scanned using our Banned Words List (see below, **section 7.5.2.8**) to reduce the likelihood of hateful terms being used.
- Usernames can generally not be edited by a user after their creation, to avoid any bypassing of our controls. Given that Models are identified and documented, which acts as a deterrent against the upload of any illegal UGC, they can change their username and stage name once per month without contacting a support agent.

7.5.2.5 Human moderation

- As set out in **section 7.1.2.5**, Aylo maintains industry-leading human moderation procedures.

7.5.2.6 Downloads are not permitted

- Downloads of content are not permitted on Pornhub as lined out in **section 7.1.2.6**.

7.5.2.7 Fingerprinting illegal material

- All terrorist material that has been flagged by moderators, is fingerprinted (hashed), as set out in **section 7.1.2.7**.

7.5.2.8 Banned Words List

- The platform utilizes a database of banned words and phrases, which are prevented from being entered into all user-input fields, as set out in **section 7.1.2.8**.

7.5.2.9 De-listing of URLs from search results

- If terrorist material is subsequently removed from the platform then the URL is provided to search engines to de-list the link, as set out in **section 7.1.2.12**.

7.5.2.10 Content Removal Request

- A content removal request (**CRR**) form is linked at the bottom of every page on the platform. Content reported through this form is immediately and automatically removed, once the reporter has confirmed their email address.

7.5.2.11 Content flagging

- The platform offers another way for logged-in users to flag all images, videos, comments, and users. Content flagged in this manner will be reviewed by a moderator within just a few hours and de-published if it is found to violate our Terms of Service.

7.5.2.12 Contextual text moderation

- The platform uses software that scans comments in a contextual manner for multiple bad behaviors, as set out in **section 7.1.2.11**.

7.5.2.13 Messaging

- Aylo has taken several measures to ensure that the messaging function is safe and trustworthy, as set out in **section 7.1.2.19**.

7.5.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Affected viewers: 10** **Affected victims**: **9**
	Scope - Number of affected viewers: **Large (4)** (no changes to inherent risk assessment)
	Scope - Number of affected victims: **Smallest (1)** (no changes to inherent risk assessment)
	Scale – Affected viewers: Serious (3) (no changes to inherent risk assessment)
	Scale – Affected victims: Very serious (4) (no changes to inherent risk assessment)
	Remediability: • For viewers **- Possibly remediable (3)** • For victims **- Rarely remediable (4)**

	(no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Minor Likelihood - 1**
	Due to our rigorous mitigations, uploads of terrorist material are extremely unlikely. Aylo's most recent DSA Transparency Report shows that Aylo received no Member State order, no notice, and also did not identify any terrorist content through its own proactive monitoring during the period 1 July 2025 to 31 December 2025. Any onward distribution is also extremely unlikely, especially since downloads from the platform are not possible. There are no features on Pornhub that are conducive to the dissemination or amplification of terrorist content and because of the existing mitigation measures, the risk is low. **- Minor Likelihood (1)**
Overall assessment/ Salience Score	**Affected viewers: Medium - 11** **Affected victims: Low – 10**

7.5.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

7.6 AI-generated content representing illegal acts

As the general risk of NCC is already assessed above, in **section 7.2**, this section assesses the risk deriving from nature of AI-generated content representing illegal acts for viewers without the involvement of a person that is displayed without valid consent. This could be for example videos including abuse of animals. There are no direct victims of such content.

7.6.1 Inherent risks

Severity Assessment of scope, scale, and remediability	**Severity score: 9**
	Scope - Number of affected viewers: The affected population is anyone who could see the content – either on Pornhub or through potential onward distribution. The reach depends upon how long the material remains on the site and the number of views – **Large (4)**
	Scale – Seriousness of the impacts: Viewers are affected in different ways depending upon the type of content. Viewers are likely to be affected due to the nature of the material. – **Serious (3)**
	Remediability: Psychological support can remedy for viewers. Also, removal can remedy but will not remove the negative impact on those who saw it. **- Likely remediable (2)**
Likelihood The likelihood of the risk materializing	**High likelihood - 4**
	Given that malicious actors routinely seek opportunities to misuse online services for the dissemination of illegal content, it cannot be excluded that – in absence of any mitigation measures in place on Pornhub - such actors may also attempt to exploit Pornhub for sharing or distributing illegal AI-generated content. – **High likelihood (4)**
Overall assessment/ Salience Score	**Medium - 13**

7.6.2 Mitigation measures in place

7.6.2.1 Policies

- Our policies surrounding illegal material (e.g. CSAM, NCC) include the prohibition of any depictions of illegal material, even if AI-generated. Our risk assessment and mitigation measures for such content therefore also apply in this context.

7.6.2.2 Reference to further measures

- Please see the risk assessments on dissemination of the relevant type of illegal material for more information. As we require ID and consent documentation from every uploader and performer, something that is obviously impossible to receive from those within AI-generated material, the risk here is inherently low.

7.6.2.3 Generative Artificial Intelligence (GenAI) content

See **section 7.1.2.20** for Aylo's mitigation measures regarding AI-generated content.

7.6.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Severity score: 9**
	Scope - Number of affected viewers: **Large (4)** (no changes to inherent risk assessment)
	Scale – Seriousness of the impacts: Serious (3) (no changes to inherent risk assessment)
	Remediability: **Likely remediable (2)** (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Minor likelihood - 1**
	The risk is low due to the mitigation measures in place. Aylo has implemented market leading procedures for the review of content before it is accessible on Pornhub, which is significantly reducing the risk of content violating the policies on bodily harm and violent content being uploaded to Pornhub. This also includes AI-generated content.

	Onwards distribution is unlikely due to the mitigations. – **Minor likelihood (1)**
Overall assessment/ Salience Score	**Low - 10**

7.6.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

7.7 Pornography fostering abuse and violence

Abuse and violence encompass risks for mental or physical well-being, which mainly includes developing aggressive and abusive behaviour.

7.7.1 Inherent risk

Severity Assessment of scope, scale, and remediability	**Severity score**: **11**
	Scope - Affected users: Affected could be any user who could see the content – either on Pornhub or through potential onward distribution. The reach depends upon how long the material remains on the site and the number of views – **Large (4)**
	Scale - Affected users: Developing abusive and violent behaviors could have severe implications, especially for sexual partners. **– Very Serious (4)**
	Remediability: Removal can remedy but will not remove the negative impact on those who saw it or those within it. – **Possibly Remediable (3)**
Likelihood	**Some likelihood - 2**

The likelihood of the risk materializing	
	Given that malicious actors routinely seek opportunities to misuse online services for the dissemination of illegal or harmful content, it cannot be excluded that, in the absence of any mitigation measures, such actors may also attempt to exploit Pornhub to distribute content that may foster abusive or violent attitudes. Research generally does not support a causal link between pornography consumption and violence. Instead, it identifies specific individual risk factors that may render certain persons more susceptible to the effects of aggressive media. Where such vulnerability factors are absent, pornography consumption shows little correlation with violent behaviour; where they are present, pornography may act as a catalyst rather than a root cause. Moreover, while the evidence shows a more consistent correlation in relation to violent content, findings regarding non-aggressive content are more mixed, with some studies indicating that increased availability of non-violent pornography is associated with lower rates of sexual assault (*Diamond*, 2009, p. 197-199, https://www.sciencedirect.com/science/article/abs/pii/S0160252709000715?via%3Dihub). Because of the remaining risk arising from violent content Aylo rates the risk. The evidence suggests that any such negative effects are contingent on additional individual risk factors and are therefore possible, but not likely to materialize in a uniform or direct manner. – **Some Likelihood (2)**
Overall assessment/ Salience Score	**Medium – 13**

7.7.2 Mitigation measures in place

7.7.2.1 Policies

- We do not permit violent and abusive content on our platforms, as detailed in our Violent Content Policy.

7.7.2.2 Banned Words List

- The platform utilizes a database of banned words and phrases, which are prevented from being entered into all user-input fields, as set out in **section 7.1.2.8**.

7.7.2.3 Contextual Text Moderation

- The platform uses software that scans comments in a contextual manner for multiple bad behaviors, as set out in **section 7.1.2.11**.

7.7.2.4 Human moderation

- As set out in **section 7.1.2.5** Aylo maintains industry-leading human moderation procedures.

7.7.2.5 Content Removal Request

- A content removal request (**CRR**) form is linked at the bottom of every page on the platform. All visitors to the platform can use the CRR to report material, as set out in **section 7.1.2.14**.

7.7.2.6 Content Flagging

- The platform offers another way for logged-in users to flag all images, videos, comments, and users. Content flagged in this manner will be reviewed by a moderator within just a few hours and de-published if it is found to violate our Terms of Service.

7.7.2.7 Law enforcement portal

- We host a law enforcement portal so that law enforcement is able to quickly request information from the platform to assist with legal cases.

7.7.2.8 Freedom of sexual expression

- When acted out by consenting adults in safe environments and adhering to our Terms of Service, desires, fetishes and fantasies are welcomed and supported on our platform. Pornography does not always represent sexual interactions and behaviours typical of everyday life, and can depict diverse fantasies and role-play by consenting amateurs and professionals.

7.7.2.9 Sexual Wellness Center

- Our Sexual Wellness Center deals with many sexual health topics in an open, honest, and educational manner. It contains hundreds of articles from leading experts, written specifically for the Center. The Center's main contributor, Dr Laurie Betito, conducts multiple Q&As and hosts a podcast on a variety of sexual health subjects using questions posed by visitors to the site.
- Regarding abuse the Center contains: How To Date After An Abusive Relationship.

7.7.2.10 Other resources

- As violent and abuse content is also likely to be non-consensual, please also see our risk assessment on NCC in **section 7.2**.

7.7.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Severity score**: **11**
	Scope - Affected users: **Large (4)** (no changes to inherent risk)
	Scale - Affected users: – **Very Serious (4)** (no changes to inherent risk)
	Remediability: **Possibly Remediable (3)** (no changes to inherent risk)
Likelihood The likelihood of the risk materializing	**Minor likelihood - 1**
	The risk is low due to the mitigation measures in place. Aylo has implemented market leading procedures for the review of content before it is accessible on Pornhub, which is significantly reducing the risk of content violating the policies on bodily harm and violent content being uploaded to Pornhub.

	Our latest transparency report – 1 July 2025 – 31 December 2025 shows that the content removed for violence is low, therefore showing the lack of prevalence of such material on the platform: In the last six months of 2025, we removed 485 pieces of content (437 videos and 48 photos) for violating our bodily harm and violent content policy. Onwards distribution is unlikely due to the mitigations in place. – **Minor Likelihood (1)**
Overall assessment/ Salience Score	**Medium - 12**

7.7.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

8 Actual or foreseeable negative effects for the exercise of fundamental rights

8.1 Hate speech, and fostering stereotypes regarding sexual preferences and behaviour

Hate speech, and content fostering stereotypes regarding sexual preferences and behaviour, include abusive and hateful content or comments of a racist, homophobic, transphobic or otherwise derogatory nature intent to hurt or shame persons.

No matter the ethnicity, sexual orientation, gender, ability, or body type, the Pornhub community welcomes all consenting adults to connect, upload and share original content, shame-free. Our platform is for exploration and discovery, and we do not permit any discriminatory abuse towards any user.

Our Core values are Consent, Freedom of Sexual Expression, Authenticity, Originality, and Diversity.

8.1.1 Inherent Risk

Severity	

Assessment of scope, scale, and remediability	**Affected Viewers: Low - 9** **Affected Victims**: **Low – 9**
	Scope - Number of affected viewers: The affected population is anyone who could see the content. The reach depends upon how long the material remains on the site and the number of views. – **Large (4)**
	Scope - Number of affected victims: The affected population is anyone who could be targeted by hate speech and fostering stereotypes regarding sexual preferences and behavior. Those who are the target are likely to be a minority of the relevant population. – **Small (2)**
	Scale - Affected viewers: For viewers, studies suggest that hate speech correlates with negative aspects on mental well-being (*Stahel*, 2023, p. 1, https://journals.sagepub.com/doi/abs/10.1089/cyber.2022.0185). – **Serious (3)**
	Scale - Affected victims: For victims studies suggest that hate speech in general can have impacts on mental health, including the feeling of insecurity, depression, anxiety, self-doubt and reduced confidence (e.g. *Dreißigacker*, 2023, p. 2, https://link.springer.com/article/10.1186/s40163-024-00204-y). – **Very Serious (4)**
	Remediability: Removal can remedy, but will not remove the negative impact on those within it. • Affected viewers **– Likely remediable (2)** • Affected victims **– Possibly remediable (3)**
Likelihood The likelihood of the risk materializing	**Moderate Likelihood - 3**
	It cannot be excluded that malicious actors misuse Pornhub for disseminating hate speech and fostering stereotypes regarding sexual preferences and behavior. However, given

	that Pornhub is not a social media network that is designed for interaction and spreading of information, the likelihood is moderate. Therefore, it is possible that the risk materializes. – **Moderate Likelihood (3)**
Overall assessment/ Salience Score	**Affected Viewers: Medium - 12** **Affected Victims**: **Medium – 12**

8.1.2 Mitigation measures in place

8.1.2.1 Policies

- We define hate speech as any communication or material that promotes, calls for, supports, or advocates for the delegitimization, dehumanization, discrimination, segregation, detestation, or vilification of a person or group of persons by reason of the fact that they are identifiable on the basis of protected characteristics. At its most extreme, hate speech calls for, threatens, or promotes violence against people that are identifiable on the basis of protected characteristics. Both our Terms of Service, and our policy on hate speech prohibit any material featuring hate speech.

8.1.2.2 User profiles

- Usernames are scanned using our Banned Words List (see **section 8.1.2.3** below) to reduce the likelihood of hateful terms being used.
- Usernames cannot be edited by a user. Content creators can change their username and stage name once per month without contacting a support agent.
- Profile pictures are treated as uploaded images, per our moderation processes and are therefore moderated via tools and humans to ensure they do not breach our Terms of Service.
- Whilst we permit anonymous user profiles, our mitigation measures severely limit the likelihood that users share hateful material.

8.1.2.3 Banned Words List

- The platform utilizes a database of banned words and phrases, which are prevented from being entered into all user-input fields, as set out in **section 7.1.2.8**.

8.1.2.4 Contextual Text Moderation

- The platform uses software that scans comments in a contextual manner for multiple bad behaviors, as set out in **section 7.1.2.11**.

8.1.2.5 Human moderation

- As set out in **section 7.1.2.5** Aylo maintains industry-leading human moderation procedures.

8.1.2.6 Content Removal Request

- A content removal request (**CRR**) form is linked at the bottom of every page on the platform. All visitors to the platform can use the CRR form to report material, as set out in **section 7.1.2.14**.

8.1.2.7 Content flagging

- The platform offers another way for logged-in users to flag all images, videos, comments, and users. Content flagged in this manner will be reviewed by a moderator within just a few hours and de-published if it is found to violate our Terms of Service.

8.1.2.8 Law enforcement portal

- We host a law enforcement portal, as set out in **section 7.1.2.21**.

8.1.2.9 Messaging

- Aylo has taken several measures to ensure that the messaging function is safe and trustworthy, as set out in **section 7.1.2.19**.

8.1.2.10 Freedom of sexual expression

- When acted out by consenting adults in safe environments and adhering to our Terms of Service, desires, fetishes and fantasies are welcomed and supported on our platform, as set out in **section 7.7.2.8.**

8.1.2.11 Strengthening a resilient community

- Donating to BIPOC Adult Industry Collective for Black History Month: We donated to the BIPOC Adult Industry Collective, an organization offering resources, education, and support services to help fight racism in the adult entertainment industry. The organization pursues this

mission through various programs and activities designed to help community members reach their goals and fulfil their potential.

- Celebrating Excellence Throughout Black History Month: Our team is committed to fighting the stigma associated with sex work year-round. This Black History Month, we're contributing to this goal by humanizing Performers and creating links of recognition and understanding with those outside the adult entertainment industry through a Black Model Spotlight Series!

- Demystifying LGBTQ+ Slang in the Adult Industry: There's a lot of information online about the gay community, however some of it is rather incomplete, and sometimes downright offensive. We hope to clear away some of the confusion and offer you a clear and detailed breakdown of some of the terms commonly used by lesbian, gay, bisexual, transgender, queer, and pansexual groups.

8.1.2.12 Generative Artificial Intelligence (GenAI) content

- Pornhub has several mitigations in place addressing GenAI content, as set out in **section 7.1.2.20**.

8.1.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Affected Viewers: Low - 9** **Affected Victims**: **Low - 9**
	Scope - Number of affected viewers: **Large (4)** (no changes to inherent risk assessment)
	Scope - Number of affected victims: **Small (2)** (no changes to inherent risk assessment)
	Scale - Affected viewers: Serious (3) (no changes to inherent risk assessment)
	Scale - Affected victims: Very serious (4) (no changes to inherent risk assessment)
	Remediability: • Affected viewers **– Likely remediable (2)**

	• Affected victims **– Possibly remediable (3)** (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Minor Likelihood - 1**
	As our most recent transparency report shows, only a very small number of pieces of content were removed for hate speech. *"From July through December, we removed 17 pieces of content (16 videos and 1 photos) for violating our hate speech and violent speech policy."* The mitigation measures we have in place significantly reduce the likelihood that the platform can be used in this manner and therefore that any risk materializes – **Minor likelihood (1)**
Overall assessment/ Salience Score	**Affected Viewers: Low - 10** **Affected Victims**: **Low – 10**

8.1.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

8.2 Sex trafficking

Sex trafficking risks arise from the recruitment, harboring, transportation, provision, or exploitation of persons for the purpose of commercial sexual exploitation, through force, fraud, coercion, or the abuse of vulnerability, including any commercial sexual activity involving minors. Sex trafficking does not constitute a risk that inherently arises from Pornhub as an online service. Financial incentives associated with uploading content may, in theory, contribute to conditions under which such risks could materialize outside the platform.

8.2.1 Inherent Risk

Severity Assessment of scope, scale, and remediability	**Affected viewers: Low - 6** **Affected victims: Medium - 11**
	Scope – Number of affected viewers: The affected population is anyone who could see the content. Viewers are unlikely to be aware of whether an individual has been trafficked, but would be affected if they were made aware and had seen the content, this number is likely very small. – **Smallest (1)**
	Scope- Number of affected victims: The affected population is anyone. Studies suggests, that worldwide the number of sex trafficking victims is low in regard of the overall population (e.g. *Walby*, 2025, p. 679, https://link.springer.com/article/10.1007/s11205-024-03474-w#citeas). – **Small (2)**
	Scale – Affected viewers: If users are aware that an individual has been trafficked this could lead to a reduced well-being. – **Serious (3)**
	Scale – Affected victims: The impacts on victims of trafficking are likely to be highly affected. – **Most serious (5)**
	Remediability: Removal can remedy as those who saw material featuring trafficked individuals would not normally be aware. Removal would not change the effect on victims • For viewers - **Likely Remediable (2)** • For victims - **Rarely Remediable (4)**
Likelihood The likelihood of the risk materializing	**Moderate Likelihood - 3**
	Given that malicious actors routinely seek opportunities to misuse online services for the dissemination of illegal

	content, it cannot be excluded that – in absence of any mitigation measures in place on Pornhub - such actors may also attempt to exploit Pornhub for sharing or distributing material displaying victims of sex trafficking. – **Moderate Likelihood (3)**
Overall assessment/ Salience Score	**Affected viewers: Low - 9** **Affected victims: Medium – High – 14**

8.2.1 Mitigation measures in place

8.2.1.1 Policies

- Our Terms of Service prohibit any content that "in any way that promotes or facilitates prostitution, solicitation of prostitution, human trafficking, or sex trafficking".
- Our Community Guidelines state that any content that constitutes or promotes any form of human trafficking, including sex trafficking, is prohibited.

8.2.1.2 User profiles

- Content creators may choose to add information to their profile, but we provide the resources listed below to help performers keep themselves and the identity safe. See, for example, the resources for performers described below (**section 8.2.1.3**).

8.2.1.3 Resources for performers

- Guidelines are given to performers to help them understand how to protect their identity, as set out in **section 7.3.2.1**.
- As set out in **section 7.1.2.2,** Aylo maintains industry-leading mechanisms to ensure that the identity and consent of uploaders are confirmed.

8.2.1.4 Withdrawal of consent

- Performers who previously consented to the distribution of content on the platform can withdraw their consent at any time, as set out in **section 7.2.2.2**

8.2.1.5 Beneficiary controls

- Only the ID-verified, main account holder can receive payments from their account on the platform. When an account is held by a couple, the beneficiary can be either of them.

8.2.1.6 Banned Words List

- The platform utilizes a database of banned words and phrases, which are prevented from being entered into all user-input fields, as set out in **section 7.1.2.8**.

8.2.1.7 Human moderation

- As set out in **section 7.1.2.5** Aylo maintains industry-leading human moderation procedures.

8.2.1.8 Content Removal Request

- A content removal request (**CRR**) form is linked at the bottom of every page on the platform. All visitors to the platform can use the CRR form to report material, as set out in **section 7.2.2.12**.

8.2.1.9 Content flagging

- The platform offers another way for logged-in users to flag all images, videos, comments, and users. Content flagged in this manner will be reviewed by a moderator within just a few hours and de-published if it is found to violate our Terms of Service.

8.2.1.10 Law enforcement portal

- We host a law enforcement portal through which all law enforcement bodies can communicate with us, as set out in **section 7.1.2.21**.

8.2.1.11 Messaging

- Aylo has taken several measures to ensure that the messaging function is safe and trustworthy, as set out in **section 7.1.2.19**.

- Additionally, all messaging is un-encrypted.

8.2.1.12 Partnership with the Cupcake Girls

- The Cupcake Girls are an organization that provides advocacy and referral services to consensual sex workers, as well as prevention and aftercare services to those affected by sex trafficking. By sharing resources – ranging from collective collaborations to data insights – and by engaging with sex workers, the goal is to support consensual sex workers and foster an environment where their safety and success is prioritized.
- We partnered with the Cupcake Girls in September 2023 to support consensual sex workers and foster an environment where their safety and success is prioritised.
- In March 2025, Aylo announced a first-of-its-kind trafficking prevention safety video series for adult performers.

8.2.2 Residual risk

Severity Assessment of scope, scale, and remediability	**Affected viewers: Low - 6** **Affected victims: Medium - 11**
	Scope – Number of affected viewers: Smallest (1) (no changes to inherent risk assessment)
	Scope- Number of affected victims: **Small (2)** (no changes to inherent risk assessment)
	Scale – Viewers: Serious (3) (no changes to inherent risk assessment)
	Scale – Victims: Most serious (5) (no changes to inherent risk assessment)
	Remediability: • For viewers: **Likely Remediable (2)** • For victims: **Rarely Remediable (4)** (no changes to inherent risk assessment)

Likelihood The likelihood of the risk materializing	**Minor Likelihood - 1**
	We mitigate the likelihood of sex trafficking occurring on the platform in multiple different ways, this lowers the risk, but cannot eliminate it completely due to the risk occurring outside our platform. According to our most recent transparency report, Aylo has not received any notice for trafficking. Mitigating trafficking on our platform is handled by layering available measures to reduce the risk. Due to our extensive mitigation measures, not least our identify verification, consent requirements, and human moderation component, there is some minor risk of the platform being used in this manner**.** – **Minor Likelihood (1)**
Overall assessment/ Salience Score	**Affected viewers: Low - 7** **Affected victims: Medium – 12**

8.2.3 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

8.3 Privacy risks

Privacy risks primarily encompass risks arising from the processing of personal data.

8.3.1 Inherent Risk

Severity	**Affected users: 8**

Assessment of scope, scale, and remediability	**Affected registered users: 9**
	Scope - Affected users: The affected population is anyone who could access Pornhub. Therefore, a significant majority of the relevant population might potentially be impacted. – **Large (4)**
	Scope - Affected registered users: Affected registered users can mainly be performers and users with user profiles. – **Small (2)**
	Scale: Data privacy incidents may have severe and far-reaching consequences for affected individuals. Depending on the nature and sensitivity of the compromised data, such incidents may enable identity theft potentially resulting in significant financial, personal, and emotional harm to victims. These potential impacts are associated with adverse impacts for the victims. • For users: Minimal personal data is processed, making it unlikely that any risk is arising. – **Moderately serious (2)** • For registered users: Data on the account, especially the email-address, is processed and for the registration of performers, ID documents or equivalent data is processed during the registration process, mostly by third parties – **Serious (3)**
	Remediability: Depending on the data that is impacted, different strategies for remedy are possible. For example, where identity data is affected, identity monitoring can be conducted, reducing the risks of further spread of the data. In a conservative approach that favors the most critical data, Aylo believes that the remedy can rarely return those affected to the same or equivalent position as before the impact. • For users: Minimal personal data is processed. – **Likely remediable (2)**

	• For registered users: The data could potentially be used for identity theft - **Rarely remediable (4)**
Likelihood The likelihood of the risk materializing	**Affected users: Minor likelihood - 1** **Affected registered users: Moderate likelihood - 3**
	• **Affected users**: The likelihood of any data privacy risk accruing for users is highly unlikely – even without considering any mitigation – as Aylo is processing minimal data of users. – **Minor likelihood (1)** • **Affected registered users:** In the absence of mitigation measures, it cannot be excluded that personal data of registered users could be extracted, resulting in the materialization of the risk. – **Moderate Likelihood (3)**
Overall assessment/ Salience Score	**Affected users: Low - 9** **Affected registered users: Medium - 12**

8.3.2 Mitigation measures in place

8.3.2.1 Policies

- Our privacy policy makes clear the data we collect and the legal basis for its collection.

8.3.2.2 Data protection impact assessment

- Our data protection impact assessment for our identity verification providers, Yoti and Incode, are included within the supporting documentation (**Annex 3 - Data Protection Impact Assessment - YOTI - June 2024, Annex 4 - Data Protection Impact Assessment - INCODE**

- Feb 2025). The data are stored by the Trust and Safety department at Aylo. Access to the data is restricted to a selected few to prevent unlawful access. Penetration testing and security evaluation is performed to Trust and Safety Platform internally. Yoti and Incode are audited annually against the SOC2 Type 2 Security control standards and also maintains ISO 27001 certification.

8.3.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Affected users: 8** **Affected registered users: 9**
	Scope - Affected users: **Large (4)** (no changes to inherent risk)
	Scope - Affected registered users: **Small (2)** (no changes to inherent risk)
	Scale: • For users: **Moderately serious (2)** (no changes to inherent risk) • For registered users: **Serious (3)** (no changes to inherent risk)
	Remediability: • For users: **Likely remediable (2)** (no changes to inherent risk) • For registered users: **Rarely remediable (4)** (no changes to inherent risk)
Likelihood The likelihood of the risk materializing	**Affected users: Minor likelihood - 1** **Affected registered users: Some likelihood - 2**

	• **Affected users**: **Minor likelihood (1)** (no changes to inherent risk) • **Affected registered users:** As Aylo is constantly improving its measures to ensure data privacy, Aylo believes there is some minor risk that the risk materializes. – **Some Likelihood (2)**
Overall assessment/ Salience Score	**Affected users: Low - 9** **Affected registered users: Medium - 11**

8.3.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

9 Actual or foreseeable negative effects on civic discourse, electoral process and public security

9.1 Politically provocative content and adverts

Politically provocative content and advertising risks arise from the creation, dissemination, or amplification of political content or adverts that are designed to provoke strong emotional reactions, polarization, or societal tension, including through inflammatory, divisive, or misleading narratives. There is no specific risk for victims as this category assesses the overall risks to civil society.

9.1.1 Inherent Risk

Severity Assessment of scope, scale, and remediability	**Severity score: 10**
	Scope - Affected users: The affected population is anyone who could see the content. Therefore, a significant majority

	of the relevant population might potentially be impacted. – **Large (4)**
	Scale: The scale depends on the content. Shifts of public discourse are possible consequences. – **Serious (3)**
	Remediability: Removal can remedy but will not remove all the potential negative impact on those who saw it or those being displayed. – **Possibly remediable (3)**
Likelihood The likelihood of the risk materializing	**Moderate Likelihood - 3**
	It cannot be excluded that malicious actors misuse Pornhub for disseminating politically provocative content and adverts. Given that Pornhub is not a social media network that is designed for interaction and spreading of information, the likelihood is moderate, especially due to the limited functionalities for publicly spreading content. – **Moderate Likelihood (3)**
Overall assessment/ Salience Score	**Medium - 13**

9.1.2 Mitigation measures in place

9.1.2.1 Policies

- Our community guidelines prohibit the upload of content that may cause harm to individuals, specifically content which: "Constitutes hate speech or inflammatory content, including violent extremism or **political provocation**."

9.1.2.2 Identity and consent

- As set out in **section 7.1.2.2,** Aylo maintains industry-leading mechanisms to ensure that the identity and consent of uploaders are confirmed.

9.1.2.3 User Profiles

- User profiles on the platform show a limited amount of information which can be set by the user. The nature of our platform is such that it is unlikely to be targeted by those who wish to engage in foreign interference by targeting users via their profiles.
- Profile pictures are treated as uploaded images, per our moderation process and are therefore moderated via tools and humans to ensure they do not breach our Terms of Service.
- Anonymous users cannot post images and videos.
- Whilst we permit anonymous user profiles, our mitigation measures severely limit the likelihood that users share foreign interference information.

9.1.2.4 Fake User profiles

- Noted in the messaging section (see **section 9.1.2.13** below), user to user messaging is not possible on the platform, therefore limiting the risk of users being exploited by other users.
- Authoritative and high-profile sources are highly unlikely to create profiles on the platform due to the type of platform, nor would users expect this to the case, therefore limiting the likelihood that users would take anyone impersonating such a source, seriously.
- A user messaging a content creator is mitigated by the content creator's ability to report the user, who would be actioned by the support team.
- Content creators can also contact our support team directly if a pattern of bad behaviour occurs.

9.1.2.5 Contextual Text Moderation

- The platform uses software that scans comments in a contextual manner for multiple bad behaviors, as set out in **section 7.1.2.11**.

9.1.2.6 Human moderation

- As set out in **section 7.1.2.5,** Aylo maintains industry-leading human moderation procedures.

9.1.2.7 Downloads are not permitted

- Downloads of content are not permitted on Pornhub, as set out in **section 7.1.2.6**.

9.1.2.8 Fingerprinting illegal material

- All politically proactive content that has been flagged by moderators is fingerprinted (hashed), as set out in **section 7.1.2.7**.

9.1.2.9 De-listing of URLs from search results

- If politically provocative material is subsequently removed from the platform then the URL is provided to search engines to de-list the link, as set out in **section 7.1.2.12**.

9.1.2.10 Content Removal Request

- A content removal request form (**CRR**) is linked at the bottom of every page on the platform. Content reported in this manner is immediately and automatically removed, once the reporter has confirmed their email address.

9.1.2.11 Content flagging

- The platform offers another way for logged-in users to flag all images, videos, comments, and users. Content flagged in this manner will be reviewed by a moderator within just a few hours and de-published if it is found to violate our policies.

9.1.2.12 Law enforcement portal

- We host a law enforcement portal through which all law enforcement bodies can communicate with us, as set out in **section 7.1.2.21**.

9.1.2.13 Messaging

- Aylo has taken several measures to ensure that the messaging function is safe and trustworthy, as set out in **section 7.1.2.19**.

- Additionally, all messaging is un-encrypted.

9.1.2.14 Generative Artificial Intelligence (GenAI) content

See **section 7.2.2.16** for Aylo's mitigation measures regarding AI-generated content.

9.1.3 Residual risk

Severity	

Assessment of scope, scale, and remediability	**Severity score: 10**
	Scope - Affected users: **Large (4)** (no changes to inherent risk)
	Scale: Serious (3) (no changes to inherent risk)
	Remediability: **Possibly remediable (3)** (no changes to inherent risk)
Likelihood The likelihood of the risk materializing	**Minor likelihood - 1**
	Pornhub does not permit public commenting by any users as a default feature. Comments may only be posted by registered accounts and are limited to the specific video on which they are made, which materially limits their visibility and reduces their capacity for broader dissemination. In addition, Pornhub's robust safeguards governing the upload and moderation of content significantly limit the likelihood that this risk materializes through uploaded material. Taken together, these measures substantially reduce the extent to which the platform can be used in this manner and, accordingly, the likelihood that the relevant risk will materialize. – **Minor likelihood (1)**
Overall assessment/ Salience Score	**Medium - 11**

9.1.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

9.2 AI-generated content, including deep-fakes, aimed at spreading false information

Aylo has already separately assessed the risks resulting from deepfakes to the persons represented in such content, see **section 7.2**, as well as the risks deriving from the illegal or harmful nature of such content, see **section 7.6**. This section covers the separate risks resulting from AI-generated content, including deepfakes, that affect civic discourse, electoral processes and public security, for example deepfakes aimed at misrepresenting political events to unduly influence civic discourse. By its nature, this category does not create specific risks for individual victims, as it focuses on overall risks to civil society.

9.2.1 Inherent risk

Severity Assessment of scope, scale, and remediability	**Severity score: 10**
	Scope - Affected users: The affected population is anyone who could see the content. Therefore, a significant majority of the relevant population might potentially be impacted. – **Large (4)**
	Scale: The scale of impact depends on the nature of the content. Deepfakes have the potential to shape public perceptions of individuals and events and, as a result, may influence civic discourse. – **Serious (3)**
	Remediability: Removal can remedy but will not remove all the potential negative impact on those who saw it or those being displayed. – **Possibly remediable (3)**
Likelihood The likelihood of the risk materializing	**Some likelihood - 2**
	It cannot be excluded that malicious actors may try to misuse Pornhub for disseminating deepfakes. Given the clear mono-thematic focus of Pornhub as an adult content platform, Aylo assesses it as rather unlikely that Pornhub will be misused for spreading deepfakes misrepresenting

	events impacting civic discourse, electoral processes and public security as covered by this risk category. – **Some Likelihood (2)**
Overall assessment/ Salience Score	**Medium - 12**

9.2.2 Mitigation measures in place

9.2.2.1 Policies

- Our policies against the dissemination of NCC include non-consensually manipulated content (**deepfakes**). Our risk assessment and mitigation measures for such content, therefore also apply in this context.

9.2.2.2 Generative Artificial Intelligence (GenAI) content

- See **section 7.2.2.16** for Aylo's mitigation measures regarding AI-generated content.

9.2.2.3 Reference to further measures

- Please see the risk assessments on dissemination of NCC in **section 7.2** for more information. As we require ID and consent documentation from every uploader and performer, something that is obviously impossible to receive from deepfake characters, the risk here is inherently low.

9.2.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Severity score: 10**
	Scope - Affected users: **Large (4)** (no changes to inherent risk)
	Scale: Serious (3) (no changes to inherent risk)

	Remediability: **Possibly remediable (3)** (no changes to inherent risk)
Likelihood The likelihood of the risk materializing	**Minor likelihood - 1**
	The mitigation measures we have in place significantly reduce the likelihood that the platform can be used in this manner and therefore that the risk materializes. As every video is going through a pre-upload review process, it is very unlikely that content remains undetected. – **Minor likelihood (1)**
Overall assessment/ Salience Score	**Medium - 11**

9.2.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

9.3 Over-blocking

Over-blocking risks include risks for the suppression of freedom of opinion, freedom of expression, and freedom to conduct a business of content uploaders and co-performers. There is no risk for viewers as they will not realize that content was deleted.

9.3.1 Inherent risks

Severity Assessment of scope, scale, and remediability	**Severity score: 6**
	Scope - Affected users: The number of users affected by over-blocking is limited to the content creators that have

	uploaded the material and to participating co-performers. Visitors are unlikely to experience any issues if content they viewed previously is now blocked. – **Small (2)**
	Scale: The risk of over-blocking on Pornhub is moderate, as usually no political discourse is taking place. The blocking of content uploaded by creators may result in a loss of income. – **Serious (3)**
	Remediability: Putting back content that has been over-blocked would remedy the issue. – **Remediable (1)**
Likelihood The likelihood of the risk materializing	**Moderate likelihood - 3**
	In absence of the content moderation workflows, it cannot be excluded that over blocking could be an issue. – **Moderate Likelihood (3)**
Overall assessment/ Salience Score	**Low - 9**

9.3.2 Mitigation measures in place

9.3.2.1 Identity and consent

- As set out in **section 7.1.2.2,** Aylo maintains industry-leading mechanisms to ensure that the identity and consent of uploaders are confirmed. These measures significantly reduce the risk of over-blocking, as Aylo already possesses the relevant verification information at the point of upload and can promptly rely on - and, where necessary, update - this information without imposing undue or overly restrictive limitations on lawful content.

9.3.2.2 Human checks of all removed content

- Any content which is reported or flagged for removal is investigated by a human member of the content moderation team. The content moderation team will contact the content creator if there is any doubt

that the content is illegal or does not have the consent of performers. This helps prevent over-blocking as a dialogue is created with the uploader, giving them the chance to discuss the removal and provide anything required by our support team to allow the content to be re-published.

- Content creators may also appeal any decision through our internal complaints-handling mechanism. Aylo also duly cooperates with out-of-court dispute settlement bodies under Article 21 DSA.

9.3.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Severity score: 6**
	Scope - Affected users: **Small (2)** (no changes to inherent risk)
	Scale: Serious (3) (no changes to inherent risk)
	Remediability: **Remediable (1)** (no changes to inherent risk)
Likelihood The likelihood of the risk materializing	**Minor likelihood: 1**
	The mitigation measures we have in place significantly reduce the likelihood that over blocking takes place and that a risk materializes. Aylo's most recent DSA Transparency Report suggests that the vast majority of Aylo's content moderation decisions are upheld. Therefore, the moderation practices have proven effective. – **Minor likelihood (1)**
Overall assessment/ Salience Score	**Lowest – 7**

9.3.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

10 Actual or foreseeable negative effects in relation to gender-based violence, public health, minors, physical and mental well-being

10.1 Negative effects in relation to minors and Risk Review under Article 28 DSA and the Guidelines

By integrating the risk review under Article 28 DSA and Section 5 of the Guidelines into its risk assessment pursuant to Article 34 DSA, Aylo further reinforces its structured and comprehensive approach to ensuring a high level of protection for minors. Accordingly, this assessment is designed to reflect and operationalize the requirements set out in Articles 34 and 28 DSA, as further informed by the Guidelines.

Designed exclusively for adults, Pornhub operates as an age-restricted environment, as set out at the outset in the Terms of Service (https://pornhub.org/information/terms) which only allow adult users to access the platform. Aylo acknowledges that this contractual restriction does not, in itself, render the platform inaccessible to minors. Rather, it expresses Aylo's clear intention not to offer or make its services available to minors. In addition, Aylo deploys a robust set of measures to prevent – especially unintended – access by minors. Specifically, Aylo has implemented the RTA label and a self-declaration age-gating mechanism on Pornhub (and its other platforms).

As set out in detail **in section 4.1,** Aylo adopts a **holistic approach** for assessing and mitigating risks connected to Pornhub, recognizing that risks associated with adult content are not confined to a single platform but can affect the wider online ecosystem. This approach reflects the structure and objective of the DSA of ensuring a safe, predictable and trusted online environment. To meet the objectives of the DSA, systemic risks by their very nature must also take into account off-platform effects on the wider online ecosystem, such as cross-platform dissemination and user migration, as well as offline effects. These risk factors cannot be appropriately addressed through narrowly platform-focused mitigation measures, given that they do not materialize on the service itself. In consequence, Aylo assesses systemic risks by considering both their potential impact directly on Pornhub, as well as their potential consequences to the wider ecosystem beyond

the service. Correspondingly, Aylo also evaluates mitigation measures for their effectiveness and proportionality both on Pornhub and at the level of the wider ecosystem, ensuring that they are effective at meaningfully reducing overall systemic risks rather than merely displacing risks from Pornhub to other sites, or even aggravating overall risk levels by creating new risks outside of Pornhub.

Reflecting this **holistic approach**, Aylo is fully committed to supporting the development and implementation of mitigation measures that effectively protect minors from online exposure to adult and other age-restricted content. Aylo also prioritizes solutions that safeguard adult users from disproportionate interference with their privacy rights and unnecessary or repeated sharing of personal information. In this context, Aylo is closely monitoring the developments relating to the European Digital Identity (EUDI) Wallet and remains committed to its support of the European Commission in testing the EU age verification app and getting it ready for launch (also see **section 10.1.4**). Aylo appreciates the significant potential of these technologies becoming key components of an effective and ecosystem-wide approach to protecting minors. This requires their deployment as safe and trustworthy tools that gain sufficient user adoption and are implemented consistently by both end users and online platforms required to conduct age verification in the EU (and beyond).

10.1.1 Risk landscape for minors in relation to adult content online and Aylo's holistic approach

For the purpose of **identifying**, **assessing**, **and mitigating risks** for minors associated with the Pornhub service, it is critical to consider the broader context of the adult content online ecosystem as set out in **section 4.1**. This **holistic approach** is grounded in the objectives of the DSA to ensure a safe, predictable and trusted online environment, as well as in the Guidelines. Aylo maps and assesses the risks for minors arising in relation to the Pornhub service in accordance with the 5C typology developed by the OECD, as described in **section 4.2**. Throughout its risk assessment specifically for minors, Aylo is factoring in the unique dynamics of the way adult content online is disseminated and consumed. A review of the digital landscape shows that numerous non-compliant online platforms (and other websites) continue to operate without meaningful safeguards. In Aylo's longstanding industry experience and first-hand insights from several jurisdictions where Aylo has already introduced age verification, users seeking to access freely available adult content online will overwhelmingly bypass any age verification requirements they are confronted with and will either move on to other sites without such restrictions in place, or rely on circumvention methods such as VPNs to work around geographically specific access restrictions in place on an adult content site they are looking to access. These user dynamics are confirmed by Aylo's first-hand experiences with

age verification in several jurisdictions, including in France, Louisiana, and most recently the UK. In these jurisdictions, the verification process was avoided by the vast majority of users, leading to substantial and immediate losses of users. Confirming Aylo's experiences, scientific research, publicly available data, and reported incidents clearly show wherever age verification is required to be conducted at the website level for an adult content website, users choose to avoid age verification and instead immediately migrate to sites without access restrictions in place or access the site through a VPN where the age verification requirement only exists for individual geographies. Furthermore, such site-level age verification also comes with exponential privacy risks, given that users must share their personally identifiable information again and again across different websites and the different age verification mechanisms they employ.

Users are not protected by such mechanisms but are put at risk – of moving to less regulated and compliant sites, or of over-sharing their personal information for the sake of accessing adult content. The vast majority of users choose the former of those risks.

In the light of these realities, Aylo has to date chosen not to introduce age verification for users in the EU and instead has been relying on other safeguards. Pornhub can only be accessed after passing an age gate and Aylo has the RTA label implemented on Pornhub (and its other online platforms) to prevent minors from access. Together with Aylo's many other risk mitigation measures, these measures reflect the strongest commitment from anyone in the adult content industry to protect EU users, supporting lawful access for adults, and contributing to a safer overall digital environment.

At the same time, Aylo fully recognizes that the implemented mitigations are not immune to circumvention. Aylo constantly engages proactively with regulators, NGOs, law enforcement, tech firms and other organizations and stakeholders on developing even more effective measures to reduce the access of minors to adult content websites and working to secure the consensus needed for such efforts to be successful.

The most effective way to address the specific risks adult content online poses to minors would be the introduction of effective, secure, and privacy-preserving age verification - either to be implemented by all providers (a feat which is proven practically impossible to achieve and to enforce, given the tens of thousands of noncompliant sites accessible to EU users), or to be conducted at the device level. To date, no such solution is available in the EU, while the European Commission is working, with Aylo's ongoing support, on finalizing the EU age verification app.

In the light of these market realities and of the alternatives available to Aylo, Aylo has chosen the only path currently open to it for improving the protection of minors (and of its users) rather than increasing the systemic risks by pushing users to non-compliant sites. Aylo therefore considers the measures implemented on Pornhub to be compliant with Articles 34, 35 and 28 DSA, because they meaningfully enhance the protection of minors while avoiding an increase in risks associated with isolated introduction of age verification at site level. At the same time, Aylo remains fully committed to its cooperation with the European Commission on the development and readiness for the EU age verification app, recognising the importance of ensuring that it effectively protects minors.

10.1.2 Risks for minors associated with Pornhub

Separate to risks that can arise from exposure to adult content where minors choose to bypass the age gate and access Pornhub, risks to minors to which the existence of Pornhub may contribute can also materialize off-platform. The most significant risk factor in this context is CSAM. Despite Aylo's market-leading robust pre-upload measures, which are extremely effective in preventing CSAM from being uploaded to Pornhub, the mere existence of the platform could create incentives for malicious actors to produce CSAM with the intent of disseminating commercially exploiting such content via Pornhub.

In addition to this risk manifesting off platform, minors also face risks when accessing Pornhub. These fall into three main categories, two of which affect the whole ecosystem of adult content online, and one being specific to Pornhub.

Risks relevant for the whole ecosystem of adult content online:

- The first and central of these risks is that minors are exposed to adult content. Aylo recognizes, fully and unequivocally, the seriousness of negative effects that the exposure to adult content may have on minors. Content that is lawful and generally acceptable for adult audiences may still pose risks and lead to adverse consequences when accessed by minors. For that reason, Aylo operates Pornhub as a strictly adults-only environment.

- The second risk category includes risk deriving from minors being exposed to illegal and harmful content such as non-consensual, violent, or abusive content. Aylo prohibits the upload of all illegal and harmful content to Pornhub and takes substantial measures to mitigate the risks associated with such content.

Risk specific to Pornhub:

- Features that are specific to Pornhub may also pose risks to minors, for instance the (limited) communication features available only to registered users. Aylo considers these service- specific risks to be less relevant because of Pornhub's service structure as described in **section 5**. That said, Aylo has diligently assessed these risks and has implemented corresponding mitigation measures.

Finally, Aylo also considers risks for the broader ecosystem that may arise from the mitigation measures applied on Pornhub. As this dimension does not constitute a discrete risk category capable of being assessed in isolation, Aylo addresses these platform-transcending risks within the context of its evaluation of individual mitigation measures. Against this background, mitigation measures can only be reasonable, proportionate and effective when the effectiveness of the measure in mitigating an identified risk on Pornhub is weighed against the risk of all negative consequences of its implementation for users, society at large, and for the service provider. Taking to account the objectives of the DSA, Aylo evaluates measures as reasonable, proportionate and effective if they positively influence the overall levels of privacy, safety, and security of minors on Pornhub without at the same time resulting in negative consequences that outweigh the mitigation benefits manifesting on the Pornhub service.

10.1.2.1 Content risks: Age-inappropriate adult content

The level of the risk associated with minors accessing Pornhub and being exposed to legal content suitable for adults, depends on several factors. Importantly, risks related to exposure to adult content are not uniform: They vary significantly depending on individual circumstances, including age (younger versus older minors), gender, sexual orientation, and whether access to such content is unwanted or actively sought. At the same time, existing academic studies and datasets assessing risks for minors in connection with adult content are subject to notable limitations and caveats, underscoring the need for a nuanced and responsible approach.

To reflect these differentiated vulnerabilities in a structured and meaningful manner, Aylo assesses content-related risks to minors for the purposes of this risk assessment by distinguishing between two principal groups: Pre-adolescent minors, including pre-teens and early teens, and adolescent minors, covering mid-teens up to adulthood. This distinction allows for the required nuanced and proportionate evaluation of potential impacts which one and the same content can have on minors with different levels of maturity and sexual curiosity. While the assessment of the content itself remains stable – it is either lawful, or may be illegal or violating Aylo’s terms and policies – the assessment of the risk levels allocate to different age groups of minors is more nuanced.

10.1.2.1.1 Mental wellbeing: Distress

Distress refers to the immediate or short-term negative emotional and cognitive reaction a child or adolescent reports (or that observers can reasonably infer) after encountering pornographic content online. It typically manifests as feelings such as shock, disgust, fear, embarrassment, shame, anxiety, or confusion – often captured in surveys with statements like “very upset,” “bothered,” “disgusted,” or “made me feel bad.”

10.1.2.1.1.1 Inherent risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 9** **Adolescents: 9**
	Scope - Number of affected minors: The affected population comprises all minors in the European Union. Access to Pornhub is not allowed for any users below the legal age of majority in their respective jurisdiction, and at least 18 years of age, as is stated at the outset of our Terms of Service at https://www.pornhub.com/information/terms. Before accessing Pornhub, users must confirm that they have reached the required age. Aylo does not collect any mandatory age data on its users for Pornhub (nor for its other platforms), nor does the DSA (or any other regulation) require it to do so, see Article 28 (3) DSA. And in any case, minors deliberately accessing Pornhub despite the clear contractual limitation to adult users would, in line with their intentions, not state their real age anywhere on the site. The same is true for behavioural metrics: Unlike social media sites, Pornhub does not allow for individual user interactions beyond “liking” a piece of content. It is therefore impossible to draw any reliable conclusions on a given user’s age on the basis of their behaviour patterns.

Aylo also cannot rely on signals from advertising or analytics vendors to assess the age of users, such as Google Analytics, for several reasons. First of all, for users under 18, Google Analytics disables personalisation, resulting in those users being categorised as "unknown". Second, a high proportion of users access adult content sites only whilst taking measures to avoid or prevent tracking. This includes private browsing that suppresses or deletes Google Analytics cookies that are necessary to assess a user's age. This results in those users being displayed as "unknown".

Aylo is therefore not in a position to identify or develop reliable metrics quantifying – or even estimating – the number of minors accessing Pornhub. Moreover, any such abstract and aggregate figures would not permit conclusions regarding the hypothetical volume of access by minors in the absence of the mitigation measures which Aylo has put in place, given that there is no reliable way to measure the impact of those measures and then excluding it. Accordingly, when assessing the potential presence of minors on Pornhub under a hypothetical scenario without mitigations in place, Aylo must rely on general, sector-wide statistics on minors' access to adult content websites, and in particular those websites which do not have any access barriers in place.

These general statistics and research (e.g, scientific studies) on access to adult content sites by minors are by necessity highly imprecise. These limitations in mind, the following general trends can be observed across adult content (sharing) platforms:

- **Children before the age of adolescence**: Available research on minors' exposure to pornography indicates the following findings that inform this assessment:
    - Officially endorsed studies examining minors' exposure to pornographic content indicate that social media are the primary channel through which exposure occurs, rather than direct visits to adult content sites (*UK Children's Commissioner*, 2023, p. 21,

https://assets.childrenscommissioner.gov.uk/wpuploads/2023/02/cc-a-lot-of-it-is-actually-just-abuse-young-people-and-pornography-updated.pdf).

- Research further indicates that younger minors, in particular, tend to encounter pornographic content unintentionally rather than through deliberate access (*BBFC* (2020), p. 20, https://www.bbfc.co.uk/research).
- While there is no coherent picture on the exact numbers or proportions, it can be assumed that minors before the age of adolescence also access adult platforms to a certain extent (*Arcom*, 2023, p. 17, https://www.arcom.fr/en/find-out-more/studies-and-data/studies-reviews-and-reports/use-adult-websites-persons-under-18). The specific numbers provided for Pornhub need to be considered with caution (see Likeliness of inherent risk).
- Male minors are more likely to encounter adult content in all age cohorts (*Arcom*, 2023, p. 17, https://www.arcom.fr/en/find-out-more/studies-and-data/studies-reviews-and-reports/use-adult-websites-persons-under-18)

In applying a conservative over-inclusive approach biased towards a higher estimate of potential exposure, Aylo assumes, for the purposes of this risk assessment, that the proportion of pre-adolescent children who might, absent any mitigation measures, access Pornhub is limited to a small proportion. – **Small (2)**

Adolescents: It can be derived from the general surveys that with increasing age of adolescence, the visit of pornographic sites will rise as a considerable part of older adolescents, and in particular adolescent males, will proactively seek out pornographic content on the internet. Studies suggest (*Andrie et. al.*, 2021, p. 16 (https://pmc.ncbi.nlm.nih.gov/articles/PMC8534324/pdf/children-08-00925.pdf)) that a larger majority of the relevant population of adolescent minors could be impacted. – **Large (4)**

	Scale - Seriousness of the impacts: Distress as a negative emotional and cognitive reaction that may arise when minors are exposed to pornographic content is mainly a temporary state of discomfort. • Children before the age of adolescence are likely to feel more serious distress. – **Very Serious (4)** • Adolescence could feel rather moderate forms of distress. – **Serious (3)**
	Remediability: Studies suggest that sexual education in general can remedy potential negative effects of exposure to adult content on minors (*Pathmendra* et al., 2023, p. 17 (https://doi.org/10.2196/43116). Additionally, studies suggest that perceived realism is a key component for risks to materialize (*Quadara/El-Murr/Latham*, 2017, p. 51 (http://dx.doi.org/10.13140/RG.2.2.16152.11522). This also stresses the importance of sexual education. • **Children before the age of adolescence**: As a general assumption, Aylo considers that, for younger minors, the scope for effective remediation may be more limited than for adolescents, given the heightened vulnerability of this group. Accordingly, where pre-adolescent children were to access Pornhub and be exposed to adult content, remedy may return the minors to the same or equivalent position as before the impact. – **Possibly Remediable (3)** • **Adolescents**: The potential harm caused by exposure to adult content can be remedied by sexual education and open communication **– Likely Remediable (2)**
Likelihood The likelihood of the risk materializing	**Children before the age of adolescence: High Likelihood – 4** **Adolescents: Some Likelihood – 2**

	While distress is a potential negative effect of exposure, the empirical evidence shows this risk is neither universal nor static but is instead highly contingent on a minor's developmental stage. Drawing on large-scale data like the EU Kids Online 2020 report (EU Kids Online 2020, pp. 89-93, https://doi.org/10.21953/lse.47fdeqj01ofo), the risk of significant distress is most acute for younger minors (e.g., ages 9-11), who are far more likely to report feeling upset after an encounter with sexual content. However, this specific negative effect diminishes substantially for older adolescents (e.g., ages 15-16), who more frequently report neutral or even positive feelings as they develop the cognitive and emotional maturity to contextualise what they see. Additionally, the validity of "distress" as a uniform measure of harm is limited by the intentionality of the user. The research acknowledges that minors often intentionally seek out sexual content for normative developmental reasons, such as education, curiosity, or identity exploration, meaning the experience can be neutral, positive, or helpful (EU Kids Online 2020, pp. 89-93 (https://doi.org/10.21953/lse.47fdeqj01ofo)). In general, intentional access is conducted by adolescents. Therefore, the systemic risk of distress is concentrated in the youngest age cohorts, while recognizing that for older, post-pubescent minors, this particular risk recedes significantly. • Children before the age of adolescence**: High Likelihood – 4** • Adolescents**: Some Likelihood – 2**
Overall assessment/ Salience Score	**Children before the age of adolescence: Medium - 13** **Adolescents: Medium - 11**

10.1.2.1.1.2 Mitigation measures in place

10.1.2.1.1.2.1 Implementation of RTA Label

Aylo has voluntarily implemented the "Restricted to Adults (**RTA**)" label on Pornhub (and across our other adult content sites), which is a self-labeling initiative for adult content websites. Developed by the Association of Sites Advocating Child Protection (**ASACP**), the RTA label is designed to enable parental filtering as follows:

- Websites that carry the RTA label display an RTA tag in their HTML code. Operating systems, browsers, and parental filtering software recognize this tag and block access to the website for users under the specified age limit.
- Thus, parents can easily make use of parental control systems by using one of the many available options provided by operating systems or filtering software and manage them individually across all their children's devices.
- RTA labels work independently of the user's IP address or location, as they filter content based on categorization. Unlike ID-based age verification systems and facial age estimation, they cannot therefore be circumvented by using VPN-clients or by cheating the age estimation software with another person's likeness.
- The RTA labelling system also adheres to the GDPR principle of data minimization as it does not require any user data to be shared with anybody else, including with Pornhub or any third-party (age verification) agent.

- The RTA label is therefore fundamentally better suited for the protection of minors than strict ID-based age verification systems.
- More broadly, adult website filtering – a feature offered natively by all major operating systems –is the most effective way of preventing access by minors to adult content websites.

10.1.2.1.1.2.2 Age assurance by self-declaration age gate

- Aylo also applies a self-declaration age gate to ascertain every user's age before a user can access the content on Pornhub. The required statement confirms our users' adherence with the requirements of our Terms of Service, which require all users to be at least 18 years old, or the age of majority in their respective jurisdiction (where that

should be higher), see https://www.pornhub.com/information/terms. In addition, the age confirmation requirement also serves as a psychological deterrent, cautioning minors to act in a compliant manner and refrain from accessing Pornhub.

10.1.2.1.1.2.3 Sexual Wellness Center

- Our Sexual Wellness Center deals with many sexual health topics in an open, honest, and educational manner. It contains hundreds of articles from leading experts, written specifically for the Center. The Center's main contributor, Dr Laurie Betito, conducts multiple Q&As and hosts a podcast on a variety of sexual health subjects using questions posed by visitors to the site. Regarding protection of minors: the Sexual Wellness Center on the platform is thus a great possibility for minors interested in sexual education to inform and educate themselves without the necessity to consume pornographic content.

10.1.2.1.1.3 Residual risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 8** **Adolescents: 8**
	Scope - Number of affected minors: Taking into account the mitigation measures in place, Aylo considers the number of minors accessing Pornhub to be lower than described in the residual risk. This assessment is based on two principal findings: • First, the studies assessing the proportion of minors accessing Pornhub, do not specify the extent to which Aylo's access-prevention measures were considered in the study design. It strongly appears as if the presented numbers are based on every underage user who opens Pornhub in the browser without taking into account whether a parental control tool is active or whether the user misstated his / her age in the self-declaration age gate. Both

requirements would need to be fulfilled, however, to come to the conclusion that the respective underage user was actually exposed to pornographic content on Pornhub despite Aylo's measures for preventing access. Therefore, these studies need to be considered with caution.

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Aylo therefore considers for

- **Children before the age of adolescence:** Based on this, Aylo regards the number of minors accessing Pornhub before the age of adolescence in to be very small in relation to the relevant population. – **Smallest (1)**

- **Adolescents:** In applying a conservative approach favouring higher access numbers, Aylo regards the number of minors accessing Pornhub before the age of adolescence to be half of the relevant population. – **Medium (3)**

Scale - Seriousness of the impacts:

- Children before the age of adolescence: **Very Serious (4)** (no changes to inherent risk assessment)

	• Adolescence: **Serious (3)** (no changes to inherent risk assessment)
	Remediability: • Children before the age of adolescence: **Possibly Remediable (3)** (no changes to inherent risk assessment) • Adolescents: **– Likely Remediable (2)** (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Children before the age of adolescence**: **Some Likelihood - 2** **Adolescents**: **Some Likelihood - 2**
	As set out in the inherent risk **section 10.1.2.1.1.1,** one of the key factors for risks to the mental wellbeing of minors that can result from their exposure to adult content is the intentionality of access. The RTA label and the age gate are considered effective to prevent unintentional exposure of minors to content on Pornhub and therefore reduce the likelihood of the risk to materialize, especially for pre-adolescents. As set out above in the **scope** section, a proportion of visitors to Pornhub do not proceed beyond the age gate. This reflects the fact that minors who are inadvertently directed to Pornhub are prevented from accessing the platform once they are informed at the age gate that the content is intended exclusively for adults. Accordingly, minors who do access Pornhub must do so deliberately by actively passing the age gate and misrepresenting their age. Furthermore, the RTA label also prevents all minors from accessing Pornhub if parental controls are activated. If that

	is the case, then exposure of minors to adult content on Pornhub is not possible. Based on these considerations, Aylo assessed that for • Children before the age of adolescence**:** Given that pre-adolescents are generally less likely intentionally seeking adult content, the age-verification gate constitutes an effective measure in preventing this group from accessing Pornhub. Consequently, it is unlikely that the risk materializes. - **Some Likelihood (2)** • Adolescents**:** With respect to adolescents, the available research indicates that a significant proportion actively seeks access to adult content. On this basis, the baseline risk is already reduced, even before taking into account Aylo's mitigation measures. For those adolescents who do not intentionally seek out adult content, the likelihood of exposure is further reduced by the age gate and the RTA label, as accidental encounters are less likely. **- Some Likelihood (2)** (no changes to inherent risk)
Overall assessment/ Salience Score	**Children before the age of adolescence: Low - 10** **Adolescents: Low - 10**

10.1.2.1.2 Early sexual debut

Early sexual debut means the initiation of sexual intercourse before 16.

10.1.2.1.2.1 Inherent risks

Severity Score Assessment of scope, scale, and remediability.	**Children before the age of adolescence: 8** **Adolescents: 8**

Scope - Number of affected minors:

The scope is equivalent to that described in **section 10.1.2.1.1.1**, as the risk arises when minors access the service.

- Children before the age of adolescence: **Small (2)**
- Adolescents: **Large (4)**

Scale – Seriousness of the impacts: The notion that early sexual activity is intrinsically harmful requires careful scrutiny. The actual outcomes appear to be heavily determined by contextual factors such as cultural values, individual readiness, open dialogue with trusted peers and adults, and available protection, rather than by age alone. Although several authors contend that an early start is linked to “high-risk sexual activities, such as having multiple sex partners or having sex while being intoxicated” (*Vandenbosch/Eggermon*t, 2012, p. 622 (https://doi.org/10.1111/jora.12008) as well as with outcomes such as sexually transmitted infections, teenage pregnancy, and lower relationship satisfaction, it remains crucial to recognize that such associations are generated within the parameters of their respective studies (*Quadara/El-Murr/Latham*, 2017, p. 57 (http://dx.doi.org/10.13140/RG.2.2.16152.11522). This suggests that the studies may be influenced by moral bias and methodological limitations, particularly regarding sampling, which can result in associations being implicitly shaped rather than objectively assessed.

That said, in situations where (a) adolescent access to adult content does result in an earlier sexual debut, and (b) is accompanied by the adolescent feeling unprepared, this constellation has been found in several population studies to correlate with higher risk of sexually transmitted infection or pregnancy and emotional distress (*Pathmendra* et al., 2023, pp. 2 and 16 (https://doi.org/10.2196/43116).

- **Children before the age of adolescence**: Aylo believes that the impacts on pre-adolescents are

	more severe as the time of exposure is a relevant factor. – **Serious (3)** • **Adolescents**: Aylo therefore determines that exposure to pornography could be associated with adverse impacts. – **Moderately serious (2)**
	Remediability: The remediability of this risk is equivalent to that described in **section 10.1.2.1.1.1**. • Children before the age of adolescence: **Possibly remediable (3)** • Adolescents: **Likely remediable (2)**
Likelihood The likelihood of the risk materializing	**Children before the age of adolescence: Moderate likelihood - 3** **Adolescents: Moderate likelihood - 3**
	The risk does not materialise as an immediate and isolated consequence of a minor being exposed to adult content on Pornhub. Instead, the potential impact on minors is highly dependent on a range of external and individual factors, including gender, cultural values, access to open communication with trusted and responsible adults and peers, individual readiness, and available protection. Studies find a consistent but modest association between higher pornography use and earlier intercourse initiation with some gender differences and timing-of-first-exposure effects (*Peter/Valkenburg*, 2016, pp. 521 f. (https://doi.org/10.1080/00224499.2016.1143441). The association is generally modest and not universal. Taking these considerations into account, Aylo assesses the following likelihoods: • **Children before the age of adolescence**: Without any mitigation measures in place and given the uncertainty in scientific studies as to whether and with which likelihood a risk of an early sexual debut materialises,

	Aylo estimates that the likelihood of children before the age of adolescent entering Pornhub, mainly unintentionally, and leading to the risk of an early sexual debut to materialize is more probable than not. Those minors are – in tendency more vulnerable for the risk. – **Moderate Likelihood (3)** • **Adolescents**: Without any mitigation measures in place and given the uncertainty in scientific studies that the risk materializes, Aylo estimates that the likelihood of adolescents entering Pornhub and leading to the risk of an early sexual debut to materialize is more probable than not. – **Moderate Likelihood (3)**
Overall assessment/ Salience Score	**Children before the age of adolescence: Medium - 11** **Adolescents: Medium - 11**

10.1.2.1.2.2 Mitigation measures in place

Please refer to **section 10.1.2.1.1.2** for Aylo's mitigations.

10.1.2.1.2.3 Residual Risk

Severity Assessment of scope, scale, and remediability	**Children <u>before</u> the age of adolescence: 7** **Adolescents: 7**
	For the reasons set out in **section 10.1.2.1.1.3**, Aylo assesses that the scope for • **Children before the age of adolescence:** Aylo regards the number of minors accessing Pornhub before the age of adolescence to be very small. – **Smallest (1)**

	Adolescents: In applying a conservative approach favouring higher access numbers, Aylo regards the number of minors accessing Pornhub before the age of adolescence to be half of the relevant population. – **Medium (3)**
	Scale - Seriousness of the impacts: • Children before the age of adolescence: **Serious (3)** (no changes to inherent risk assessment) • Adolescents: **– Moderately Serious (2)** (no changes to inherent risk assessment)
	Remediability: • Children before the age of adolescence: **Possibly Remediable (3)** (no changes to inherent risk assessment) • Adolescents: **– Likely Remediable (2)** (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Children before the age of adolescence: Some Likelihood - 2** **Adolescents: Moderate Likelihood - 3**
	Likelihood: Aylo's mitigations primarily aim at preventing minors from accessing Pornhub in the first place. As set out in **section 10.1.2.1.1.3,** Aylo's mitigations can effectively prevent unintentional access by minors. Therefore, Aylo considers that • Children before the age of adolescence: Given that pre-adolescents are generally less likely to intentionally seek out adult content, the self-declaration age gate is an effective measure in preventing this group from accessing Pornhub. Consequently, it is unlikely that the risk materializes.

	Some Likelihood (2) • Adolescents: **Moderate Likelihood (3)** (no changes to inherent risk).
Overall assessment/ Salience Score	**Children before the age of adolescence: Low – 10** **Adolescents: Low – 10**

10.1.2.1.3 Distorted gender norms and sexual objectification

Distorted gender norms and sexual objectification mean the endorsement of stereotypical beliefs (e.g., male dominance, female submission) and treating bodies as objects.

10.1.2.1.3.1 Inherent Risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 8** **Adolescents: 8**
	Scope - Number of affected minors: The scope is equivalent to that described in **section 10.1.2.1.1.1**, as the risk arises when minors access the service. • Children before the age of adolescence: **Small (2)** • Adolescents: **Large (4)**
	Scale – Seriousness of the impacts: Distorted gender norms and sexual objectification can lead to a male focused sexuality. Overall, Aylo assesses that the risk is for

	• **Children before the age of adolescence**: Aylo believes that the impacts on pre-adolescents are more severe as the time of exposure is a relevant factor for gender norms to be established. – **Serious (3)** • **Adolescents**: Aylo assesses that, for adolescents, exposure to pornographic content could be associated with negative impacts, as gender norms are typically more established and the capacity to critically evaluate content increases with age. – **Moderately serious (2)**
	Remediability: The remediability of this risk is equivalent to that described in **section 10.1.2.1.1.1**. • Children before the age of adolescence: **Possibly remediable (3)** • Adolescents: **Likely remediable (2)**
Likelihood The likelihood of the risk materializing	**Children before the age of adolescence: Moderate Likelihood – 3** **Adolescents: Some Likelihood – 2**
	The risk does not materialise as an immediate and isolated consequence of a minor being exposed to adult content on Pornhub. Instead, the potential impact on minors is highly dependent reaction of the minor to the material (*To/Ngai/Kan*, 2012, p. 2159, https://doi.org/10.1016/j.childyouth.2012.07.019). Meta-analytic synthesis have shown that adolescents' pornography use is related to stronger gender-stereotypical sexual beliefs (*Peter/Valkenburg*, 2016, p. 520 (https://doi.org/10.1080/00224499.2016.1143441). However, a recent meta study notes that the evidence on

	whether pornography use predicts stereotypical gender beliefs is ambivalent, contradictory and gender-specific **(***Paulus* et al., 2023, pp. 654 f. (https://doi.org/10.1016/j.encep.2023.12.004). Especially the use of Internet pornography not only predicted stronger stereotypical beliefs over time but stereotypical beliefs also predicted a more frequent use of Internet pornography over time. This relation was significantly stronger for male than for female adolescents and was mediated by liking pornography (*Peter/Valkenburg*, 2016, pp. 520 and 524 (https://doi.org/10.1080/00224499.2016.1143441). That said, while the evidence suggests a correlation between adolescent pornography use and less progressive, gender-stereotypical sexual beliefs, according to the same researchers, the association must be interpreted with significant caution. Taking these considerations into account, Aylo assesses the following likelihoods: ○ **Children before the age of adolescence**: Without any mitigation measures in place and given the uncertainty in scientific studies as to whether and with which likelihood a risk of distorted gender norms and sexual objectification materialises, Aylo estimates that the likelihood of children before the age of adolescent entering Pornhub, mainly unintentionally, and leading to the risk to materialize is more probable than not. – **Moderate Likelihood (3)** ○ **Adolescents**: Without any mitigation measures in place and given the uncertainty in scientific studies that the risk materializes, Aylo estimates that the likelihood of adolescents entering Pornhub and leading to the risk of an early sexual debut to materialize is unlikely. – **Some Likelihood (2)**
Overall assessment/ Salience Score	**Children <u>before</u> the age of adolescence: Low – 11**

	Adolescents: Low – 10

10.1.2.1.3.2 Mitigation measures in place

Please refer to **section 10.1.2.1.1.2** for Aylo's mitigations.

10.1.2.1.3.3 Residual Risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 7** **Adolescents: 7**

Scope - Number of affected minors: For the reasons set out in **section 10.1.2.1.1.3**, Aylo assess that the scope for

- **Children before the age of adolescence:** Aylo regards the number of minors accessing Pornhub before the age of adolescence to be very small. – **Smallest (1)**
- **Adolescents:** In applying a conservative approach favouring higher access numbers, Aylo regards the number of minors accessing Pornhub before the age of adolescence to be half of the relevant population. – **Medium (3)**

Scale - Seriousness of the impacts:

- Children before the age of adolescence: **Serious (3)** (no changes to inherent risk assessment)
- For adolescents: **Moderately Serious (2)** (no changes to inherent risk assessment)

Remediability:

- Children before the age of adolescence: **Possibly Remediable (3)** (no changes to inherent risk assessment)

	• Adolescents: **– Likely Remediable (2)** (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Children <u>before</u> the age of adolescence**: **Some Likelihood - 2** **Adolescents**: **Some Likelihood - 2**
	Likelihood: Aylo's mitigations primarily aim at preventing minors from accessing Pornhub in the first place. As set out in **section 10.1.2.1.1.3,** Aylo's mitigations can effectively prevent <u>unintentional</u> access by minors. Therefore, Aylo considers that • Children before the age of adolescence: Given that pre-adolescents are generally less likely to intentionally seek out adult content, the self-declaration age gate is an effective measure in preventing this group from accessing Pornhub. Consequently, it is unlikely that the risk materializes. **Some Likelihood (2)** • Adolescents: **Some Likelihood (2)** (no changes to inherent risk).
Overall assessment/ Salience Score	**Children <u>before</u> the age of adolescence: Low – 9** **Adolescents: Low – 9**

10.1.2.1.4 Unrealistic expectations about sexual intercourse

Unrealistic expectations about sexual intercourse means distorted beliefs about what “normal” sex should look like, e.g. constant enthusiasm, rough or adventurous acts, instant performance, male-centered pleasure, the

assumption that real partners will mirror such scripts and possible feelings of dissatisfaction.

10.1.2.1.4.1 Inherent risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 8** **Adolescents: 8**
	Scope - Number of affected minors: The scope is equivalent to that described **in section 10.1.2.1.1.1**, as the risk arises when minors access the service. • Children before the age of adolescence: **Small (2)** • Adolescents: **Large (4)**
	Scale - Seriousness of the impacts: Unrealistic expectations about sexual intercourse can reduce intimacy and lead to rough or adventurous acts or performance pressure. • **Children before the age of adolescence**: Aylo believes that the impacts on pre-adolescents are more severe as the age of exposure is a relevant factor for establishing expectations on sexual intercourse. – **Serious (3)** • **Adolescents**: Aylo assesses that, for adolescents, exposure to pornographic content could be associated with adverse impacts, as expectations on sexual intercourse are typically more established and the capacity to critically evaluate content increases with age. – **Moderately serious (2)**
	Remediability: The remediability of this risk is equivalent to that described in **section 10.1.2.1.1.1**.

	• Children before the age of adolescence: **Possibly remediable (3)** • Adolescents: **Likely remediable (2)**
Likelihood The likelihood of the risk materializing	**Children before the age of adolescence: Moderate Likelihood – 3** **Adolescents: Some Likelihood – 2**
	Pornography could play a role in shaping young people's sexual behaviour, although there is still a lack of clarity as to how this manifests in real-world actions (*Quadara/El-Murr/Latham*, 2017, p. 52, http://dx.doi.org/10.13140/RG.2.2.16152.11522). Available research heavily relies on self-report and cross-sectional data and only a few studies map the full causal chain from viewing to expectations about sex to the following behaviour (*Peter/Valkenburg*, 2016, pp. 510 f. (https://doi.org/10.1080/00224499.2016.1143441)). Many studies consistently show that pornography does not uniformly warp adolescents' views of sex, but frequent exposure, especially when judged "realistic", can foster exaggerated, performance-driven expectations (*Milas/Wright/Štulhofer*, 2019, p. 11 (https://doi.org/10.1080/00224499.2019.1607817) and some LGBTQ and minority youth report educational or identity-affirming benefits, illustrating a nuanced risk/benefit profile (*Paulus* et al., 2024, pp. 657 f. (https://doi.org/10.1016/j.encep.2023.12.004)). Overall, Aylo considers that pornography could be associated with unrealistic expectations about sexual intercourse, impacting beliefs about performance and pleasure. This is not a uniform or direct effect, as most adolescents demonstrate a critical awareness that pornography is not realistic (BBFC, 2020, p. 44 (https://www.bbfc.co.uk/research)). The actual impact is highly contingent on mediating factors, including the individual's perceived realism of the content, the frequency

	and type of material consumed, and their motivation for viewing. In absences of any mitigation measures, Aylo assesses for • Children before the age of adolescence: Younger minors are likely to be more affected. - **Moderate Likelihood – 3** • Adolescents: Adolescents have a more critical awareness of the information they are exposed to. - **Some Likelihood – 2**
Overall assessment/ Salience Score	**Children before the age of adolescence: Medium – 11** **Adolescents: Low – 10**

10.1.2.1.4.2 Mitigation measures in place

Please refer to **section 10.1.2.1.1.2** for Aylo's mitigations.

10.1.2.1.4.3 Residual risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 7** **Adolescents: 7**
	Scope - Number of affected minors: For the reasons set out in **section 10.1.2.1.1.3**, Aylo assesses that the scope for • **Children before the age of adolescence:** Aylo regards the number of minors accessing Pornhub before the age of adolescence to be very small. – **Smallest (1)** • **Adolescents:** In applying a conservative approach favouring higher access numbers, Aylo

	regards the number of minors accessing Pornhub before the age of adolescence to be half of the relevant population. – **Medium (3)**
	Scale - Seriousness of the impacts: • Children before the age of adolescence: **Serious (3)** (no changes to inherent risk assessment) • For adolescents: **Moderately Serious (2)** (no changes to inherent risk assessment)
	Remediability: • Children before the age of adolescence: **Possibly Remediable (3)** (no changes to inherent risk assessment) • Adolescents: **– Likely Remediable (2)** (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Children before the age of adolescence: Some Likelihood - 2** **Adolescents: Some Likelihood - 2**
	Likelihood: Aylo's mitigations primarily aim at preventing minors from accessing Pornhub in the first place. As set out in **section 10.1.2.1.1.3,** Aylo's mitigations can effectively prevent unintentional access by minors. Therefore, Aylo considers that • Children before the age of adolescence: Given that pre-adolescents are generally less likely to intentionally seek out adult content, the self-declaration age gate is an effective measure in preventing this group from accessing Pornhub. Consequently, it is unlikely that the risk materializes.

	Some Likelihood (2) • Adolescents: **Some Likelihood (2)** (no changes to inherent risk).
Overall assessment/ Salience Score	**Children <u>before</u> the age of adolescence: Low – 9** **Adolescents: Low – 9**

10.1.2.1.5 Sexual aggression and acceptance of sexual aggression

Sexual aggression and acceptance of sexual aggression encompass sexual harassment and coercion, as well as sexual assault and abuse and acceptance thereof.

10.1.2.1.5.1 Inherent Risk

Severity Score Assessment of scope, scale, and remediability	**Children <u>before</u> the age of adolescence: 8** **Adolescents: 9**
	Scope - Number of affected minors: As set out in **section 10.1.2.1.1.1,** Aylo views that the scope of minors being exposed to adult content on Pornhub is • Children before the age of adolescence: **Small (2)** • Adolescents: **Large (4)** Sexual aggression and acceptance of sexual aggression, however, mostly originates from males. Pornography exposure does not independently cause sexual aggression for most males; its impact hinges on pre-existing risk factors such as hostility toward women, antisocial tendencies, and an interest in impersonal or domination-focused sex (*Saqib/Davidson*, 2023, p. 3 (https://doi.org/10.5964/sotrap.13005);

Wright/Tokunaga/Kraus, 2015, p. 19 (https://doi.org/10.1111/jcom.12201); *Quadara/El-Murr/Latham*, 2017, p. 59 (http://dx.doi.org/10.13140/RG.2.2.16152.11522)).

Adolescents who already exhibit these traits both consume (especially violent) pornography more often and are more influenced by its messages, making high-frequency use problematic mainly for this high-risk subgroup (*Malamuth/Huppin*, 2005, p. 316 (http://dx.doi.org/10.1016/j.admecli.2005.02.004)). When sexually violent depictions included a woman represented as aroused by the conditions of sexual violence, research participants reported believing that a higher percentage of women derived pleasure from sexual violence. This effect was particularly evident in men who had shown a predisposition towards sexual aggression, and not evident in men who had not shown such a predisposition. This, the authors concluded, evidences how violent pornography acts in the attitudes of men with sexually aggressive tendencies, which is to reinforce that sexual violence is acceptable and desirable, but does not have such an effect on all men (*Malamuth/Huppin*, 2005, p. 321 (http://dx.doi.org/10.1016/j.admecli.2005.02.004)).

In light of these findings, Aylo considers that for

- children before the age of adolescence only a slight proportion of the relevant population is potentially impacted as mainly boys are affected. – **Smallest (1)**

- adolescents, half or a slight majority of the relevant population is potentially impacted as mainly boys are affected. – **Medium (3)**

Scale - Seriousness of the impacts: Sexual aggression and acceptance of sexual aggression are very serious risk. - **Very Serious (4)**

Remediability:

The remediability of this risk is equivalent to that described in **section 10.1.2.1.1.1**.

	• Children before the age of adolescence: **Possibly remediable (3)** • Adolescents: **Likely remediable (2)**
Likelihood The likelihood of the risk materializing	**Children before the age of adolescence: High Likelihood – 4** **Adolescents: High Likelihood – 4**
	The relationship between pornography consumption and high-risk sexual behaviours like forced sex is empirically inconclusive, based on a limited body of predominantly cross-sectional research that yields contradictory findings. The critical variable appears to be the nature of the content. While a modest, though potentially biased, correlation has been noted between violent pornography and sexual aggression, this contrasts with findings associated nonviolent content with a reduction in such behaviours among older populations. This suggests that any potential association with sexually aggressive behaviour is specific to the consumption of violent material, not pornography as a whole (*Pathmendra* et al., 2023, p. 16, https://doi.org/10.2196/43116). Additionally, studies suggest that exposure to pornography does not independently cause sexual aggression for most males and that its impact hinges on pre-existing risk factors, such as hostility toward women, antisocial tendencies, and an interest in impersonal or domination-focused sex (*Saqib/Davidson*, 2023, p. 4, https://doi.org/10.5964/sotrap.13005; *Wright/Tokunaga/Kraus*, 2015, p. 19, https://doi.org/10.1111/jcom.12201; *Quadara/El-Murr/Latham*, 2017, p. 59, http://dx.doi.org/10.13140/RG.2.2.16152.11522). Based on these considerations, Aylo applies a conservative approach and assesses the likelihood to be high where violent content is accessible.

	• Children before the age of adolescence: **High Likelihood – 4** • Adolescents: **High Likelihood – 4**
Overall assessment/ Salience Score	**Children before the age of adolescence: Medium - 12** **Adolescents: Medium - 13**

10.1.2.1.5.2 Mitigation measures in place

Please refer to **section 10.1.2.1.1.2** for Aylo's mitigations. Additionally, Aylo's strong pre-upload procedures prevent illegal or harmful content to appear on Pornhub as set out in **sections 7.5.2**, **7.6.2** and **7.7.2**.

10.1.2.1.5.3 Residual risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 8** **Adolescents: 8**
	Scope - Number of affected minors: • Children before the age of adolescence: **Smallest (1)** (no changes to inherent risk assessment) • Adolescents: Because Aylo's mitigation measures reduce the number of minors entering Pornhub as described in **section 10.1.2.1.1.3 - Small (2)**
	Scale - Seriousness of the impacts: **Very Serious (4)** (no changes to inherent risk assessment)
	Remediability:

	• Children before the age of adolescence: **Possibly Remediable (3)** (no changes to inherent risk assessment) • Adolescents: **Likely Remediable (2)** (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Children <u>before</u> the age of adolescence**: **Minor Likelihood - 1** **Adolescents**: **Minor Likelihood - 1**
	The likelihood reduced due to Aylo's mitigation measures. As studies indicate that violent content is likely to contribute to the materialisation of this risk (see scale in **section 10.1.2.1.5.1**), Aylo's robust measures to prevent the upload of content that violates its policies on bodily harm and violent content mitigate the risk (see **section 7.5.3, 7.6.3 and 7.7.3**). Minors are therefore unlikely to be confronted with especially harmful violent content. For non-violent content, the likelihood of the risk to materialize is low. Additionally, as set out in **section 10.1.2.1.1.3**, Aylo's mitigations effectively prevent unintentional access by minors. As the materialization of the risk also mainly depends on the intentionality of access, Aylo considers the likelihood of materialization of the risk to be reduced. Based on this findings, Aylo assesses that • Children before the age of adolescence: **Minor Likelihood (1)** • Adolescents: **Minor Likelihood (1)**
Overall assessment/ Salience Score	**Children <u>before</u> the age of adolescence: Low – 9**

	Adolescents: Low – 9

10.1.2.1.6 Self-esteem and body image distortion

Self-esteem and body image distortion address the impact of an internalisation of porn-derived appearance ideals – e.g. large breasts, minimal body-fat, muscular build, "perfect" genitals and the resulting self-objectification.

10.1.2.1.6.1 Inherent risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 8** **Adolescents: 8**
	Scope - Number of affected minors: The scope is equivalent to that described in **section 10.1.2.1.1.1**, as the risk arises when minors access the service. • Children before the age of adolescence: **Small (2)** • Adolescents: **Large (4)**
	Scale - Seriousness of the impacts: Reduced self-esteem and body image distortion can impact the lives of minors. • **Children before the age of adolescence**: Aylo believes that the impacts on pre-adolescents are more severe as the age of exposure is a relevant factor for establishing self-esteem. – **Serious (3)** • **Adolescents**: Aylo assesses that, for adolescents, exposure to pornographic content could be associated with adverse impacts, as self-esteem is typically more established and the capacity to critically evaluate content increases with age. – **Moderately serious (2)**

	Remediability: The remediability of this risk is equivalent to that described in **section 10.1.2.1.1.1**. • Children before the age of adolescence: **Possibly remediable (3)** • Adolescents: **Likely remediable (2)**
Likelihood The likelihood of the risk materializing	**Children before the age of adolescence: Moderate Likelihood – 3** **Adolescents: Moderate Likelihood – 3**
	The studies on the impacts of pornography on self-esteem and body image distortion are predominantly observational. Pornography is not the sole driver of adolescent body-image distress, yet regular viewing, especially when judged "realistic", adds a layer of self-objectification and dissatisfaction, with boys and girls fixating on different porn-mediated ideals (*Quadara/El-Murr/Latham*, 2017, p. 53 (http://dx.doi.org/10.13140/RG.2.2.16152.11522);*Peter/Valkenburg*, 2016, p. 521 (https://doi.org/10.1080/00224499.2016.1143441)). Therefore, Aylo assess that for • Children before the age of adolescence: **Moderate Likelihood (3)** • Adolescents: **Moderate Likelihood (3)**
Overall assessment/ Salience Score	**Children before the age of adolescence: Medium - 11** **Adolescents: Medium - 11**

10.1.2.1.6.2 Mitigation measures in place

Please refer to **section 10.1.2.1.1.2** for Aylo's mitigations

10.1.2.1.6.3 Residual risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 7** **Adolescents: 7**
	For the reasons set out in **section 10.1.2.1.1.3**, Aylo assesses that the scope for • Children before the age of adolescence: Aylo regards the number of minors accessing Pornhub before the age of adolescence to be very small. – **Smallest (1)** • Adolescents: In applying a conservative approach favouring higher access numbers, Aylo regards the number of minors accessing Pornhub before the age of adolescence to be half of the relevant population. – **Medium (3)**
	Scale - Seriousness of the impacts: • **Children before the age of adolescence**: **Serious (3)** (no changes to inherent risk assessment) • **Adolescents**: **Moderately serious (2)** (no changes to inherent risk assessment)
	Remediability: • Children before the age of adolescence: **Possibly Remediable (3)** (no changes to inherent risk assessment) • Adolescents: **– Likely Remediable (2)** (no changes to inherent risk assessment)

Likelihood The likelihood of the risk materializing	**Children before the age of adolescence**: **Some Likelihood - 2** **Adolescents**: **Moderate Likelihood – 3**
	Likelihood: Aylo's mitigations primarily aim at preventing minors from accessing Pornhub in the first place. As set out in **section 10.1.2.1.1.3,** Aylo's mitigations can effectively prevent unintentional access by minors. Therefore, Aylo considers that • Children before the age of adolescence: Given that pre-adolescents are generally less likely to intentionally seek out adult content, the self-declaration age gate is an effective measure in preventing this group from accessing Pornhub. Consequently, it is unlikely that the risk materializes. **Some Likelihood (2)** Adolescents: **Moderate Likelihood (3)** (no changes to inherent risk).
Overall assessment/ Salience Score	**Children before the age of adolescence: Low – 9** **Adolescents: Low – 10**

10.1.2.1.7 Further mental health harms: Anxiety / depression

Further mental health harms includes clinical or sub-clinical symptoms of anxiety (e.g., persistent worry, performance-related stress, shame) and depression (e.g., lasting sadness, feelings of inadequacy, and loss of interest in social activities).

10.1.2.1.7.1 Inherent risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 10** **Adolescents: 12**
	Scope - Number of affected minors: Studies mainly find that it is not that typical use of pornography causes these conditions, but rather that minors – especially boys - with pre-existing mental health challenges are at a higher risk of developing problematic usage patterns that could, in turn, exacerbate their condition (*Doornwaard* et al., 2015, pp. 79 f., https://doi.org/10.1007/s10964-015-0326-9). Based on this and by taking into consideration the scope described in **section 10.1.2.1.1.1**, Aylo assesses for • Children before the age of adolescence: **Smallest (1)** • Adolescents: **Medium (3)**
	Scale - Seriousness of the impacts: Depression and anxiety are very severe risks. – **Most serious (5)**
	Remediability: If minors actually suffer from anxiety or depression, it is rarely possible to return those affected to the same or equivalent condition, for both children before the age of adolescence and for adolescence. – **Rarely remediable (4)**
Likelihood The likelihood of the risk materializing	**Children before the age of adolescence: Minor Likelihood – 1** **Adolescents: Minor Likelihood – 1**
	A direct causal link from pornography consumption to the onset of anxiety or depression in the general adolescent

	population is not supported by the evidence. Instead, the research indicates that the causal relationship often operates in the reverse: pre-existing vulnerabilities, such as depressive symptoms or low self-esteem, are significant predictors for the development of compulsive consumption patterns, as some adolescents may turn to pornography as a coping mechanism for negative emotional states (*Doornwaard* et al., 2015, pp. 79 f. (https://doi.org/10.1007/s10964-015-0326-9); *Happ/Harpenau/Wiewiorra*, 2024, p. 33 (https://www.wik.org/en/publications/publication/working-paper-nr-9-oekonomie-und-regulierung-von-pornografischen-online-inhalten)). Based on this, it is unlikely that minors access Pornhub and as a result suffer from mental health harms. • Children before the age of adolescence**: Minor Likelihood (1)** • Adolescents**: Minor Likelihood (1)**
Overall assessment/ Salience Score	**Children before the age of adolescence: Medium – 11** **Adolescents: Medium – 13**

10.1.2.1.7.2 Mitigation measures in place

Please refer to **section 10.1.2.1.1.2** for Aylo's mitigations

10.1.2.1.7.3 Residual risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 10** **Adolescents: 12**
	Scope - Number of affected minors:

	• Children before the age of adolescence**: Smallest (1)** (no changes to inherent risk) • Adolescents**: Medium (3)** (no changes to inherent risk)
	Scale - Seriousness of the impacts: **Most serious (5)** (no changes to inherent risk assessment)
	Remediability: Rarely remediable (4) (no changes to inherent risk).
Likelihood The likelihood of the risk materializing	**Children <u>before</u> the age of adolescence**: **Minor Likelihood - 1** **Adolescents**: **Minor Likelihood - 1**
	As Aylo's mitigations, additionally prevent minors from accessing Pornhub. This would further reduce the likelihood; however, as the likelihood is already minor, it is equivalent to the inherent risk. • Children <u>before</u> the age of adolescence**: Minor Likelihood (1)** (no changes to inherent risk assessment) • Adolescents**: Minor Likelihood (1)** (no changes to inherent risk assessment)
Overall assessment/ Salience Score	**Children <u>before</u> the age of adolescence: Medium - 11** **Adolescents: Medium - 13**

10.1.2.2 Content risk: Exposure to illegal or harmful content (not including CSAM)

As minors are more vulnerable when it comes to risks deriving from display of illegal or other harmful content, Aylo assesses this risk additionally to the risks identified above. The central risks here are violent content, terrorist content and AI-generated content representing illegal acts.

10.1.2.2.1 Inherent risk

Severity Assessment of scope, scale, and remediability	**Children before the age of adolescence: 10** **Adolescents: 12**
	Scope - Affected minors: The scope is equivalent to that described in **section 10.1.2.1.1.1**, as the risk arises when minors access the service. • Children before the age of adolescence: **Small (2)** • Adolescents: **Large (4)**
	Scale - Affected minors: Illegal content including content that includes terrorist propaganda or violence can have very adverse impacts on minors. The effects can be mental health harms. **– Very Serious (4)**
	Remediability: Removal can remedy but will not remove the negative impact on those who saw it. – **Rarely Remediable (4)**
Likelihood The likelihood of the risk materializing	**High Likelihood - 4**
	Given that malicious actors routinely seek opportunities to misuse online services for the dissemination of illegal content, it cannot be excluded that – in absence of any mitigation measures in place on Pornhub - such actors may also attempt to exploit Pornhub for sharing or distributing illegal content and risks for minors materialize. – **High Likelihood (4)**
Overall assessment/ Salience Score	**Children before the age of adolescence: Medium - 14**

	Adolescents: Medium - high - 16

10.1.2.2.2 Mitigation measures in place

Aylo's leading industry safeguards are described in **section 7.1.2**.

10.1.2.2.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Children before the age of adolescence: 10** **Adolescents: 12**
	Scope - Affected minors: • Children before the age of adolescence: **Small (2)** • Adolescents: **Large (4)** (no changes to inherent risk)
	Scale - Affected minors: Very Serious (4) (no changes to inherent risk)
	Remediability: **Rarely Remediable (4)** (no changes to inherent risk)
Likelihood The likelihood of the risk materializing	**Minor Likelihood - 1**
	The risk is low due to the mitigation measures in place. As described **in sections 7.5.3, 7.6** and **7.7.3** such content is very unlikely to appear on Pornhub. – **Minor Likelihood (1)**
Overall assessment/ Salience Score	**Children before the age of adolescence: Low - 11** **Adolescents: Medium - 13**

10.1.2.3 Off-platform and content risk: CSAM

The risks from CSAM can manifest twofold: First, the mere availability of Pornhub may create conditions that could incentivize malicious actors to produce CSAM in the first place, including potential financial motivations linked to the platform's existence. Second, there is a risk that minors may be exposed to CSAM on Pornhub.

10.1.2.3.1 Inherent risks

Severity Score Assessment of scope, scale, and remediability	**Affected viewers:** • **Children before the age of adolescence: 10** • **Adolescents: 12** **Affected victims: 12**
	Scope – Number of affected viewers: The scope is equivalent to that described in **section 10.1.2.1.1.1**, as the risk arises when minors access the service. • Children before the age of adolescence: **Small (2)** • Adolescents: **Large (4)**
	Scope - Number of affected victims: The affected population comprises all minors within the European Union. As to the nature of such material there are no hard statistics on the number of affected minors. The National Conter for Missing & Exploited Children (**NCMEC**) states that more than 30.000 victims were identified by law enforcement and submitted to NCMEC. Interpol has identified 42,300 victims worldwide. At the same time, the total number of reports of CSAM issued to NCMEC added up to 19,854,300. This gap suggests, that the numbers are not accurate and not fully reliable. It goes without saying that the display of minors should never occur and must be treated as a matter of utmost seriousness. While fully acknowledging that even a single instance is unacceptable, the available data indicates that, from a global perspective, only a comparatively small number of minors appear to be affected. – **Small (2)**

	Scale – Seriousness of the impacts for viewers: Exposure to CSAM can have very adverse impacts on minors. The effects can be mental health harms. **– Very Serious (4)**
	Scale – Seriousness of the impacts for affected victims: The impacts for the victims are - **Most serious (5)**
	Remediability for viewers: Removal can remedy but will not remove the negative impact on those who saw it. – **Rarely Remediable (4)**
	Remediability for victims: Many studies suggest that the effects on minors if displayed in CSAM are severe and long-lasting (SURVIVORS' SURVEY, Canadian Centre for Child Protection, 2017). – **Not Remediable (5)**
Likelihood The likelihood of the risk materializing	**Affected viewers: High likelihood - 4** **Affected victims: Certain - 5**
	Given that malicious actors routinely seek opportunities to misuse online services for the dissemination of illegal content, it cannot be excluded that – in absence of any mitigation measures in place on Pornhub - such actors may also attempt to exploit Pornhub for sharing or distributing CSAM. • The risks for victims are very likely to occur as a result. – **Certain (5)** • For viewers, the risk is likely to occur**. – High likelihood (4)**
Overall assessment/ Salience Score	**Affected viewers:** • **Children before the age of adolescence: Medium-high – 14** • **Adolescents: Medium – high: 16**

	Affected victims: High – 17

10.1.2.3.2 Mitigation measures in place

Aylo's leading industry safeguards are described in **section 7.1.2**.

10.1.2.3.3 Residual risk

Severity Score Assessment of scope, scale, and remediability	**Affected viewers:** • **Children before the age of adolescence: 10** • **Adolescents: 12** **Affected victims: 12**
	Scope – Number of affected viewers: • Children before the age of adolescence: **Small (2)** • Adolescents: **Large (4)** (no changes to inherent risk assessment)
	Scope - Number of affected victims: **Small (2)** (no changes to inherent risk assessment)
	Scale – Seriousness of the impacts for viewers: **Very serious (4)** (no changes to inherent risk assessment)
	Scale – Seriousness of the impacts for victims: **Most Serious (5)** (no changes to inherent risk assessment)
	Remediability for viewers: Rarely Remediable (4) (no changes to inherent risk assessment)
	Remediability: Not Remediable (5) (no changes to inherent risk assessment)

Likelihood The likelihood of the risk materializing	**Minor Likelihood - 1**

It is highly unlikely that CSAM will be uploaded and disseminated on Pornhub due to the numerous mitigation measures in place. In consequence, it is very unlikely that the risk materializes.

Aylo's most recent transparency report shows that only a very small share of uploads contain CSAM and an even smaller share of those uploads were caught after publication; the vast majority was caught pre-publication:

"Of the videos uploaded and reported as potential CSAM in the second half of 2025, which represents 0.11% of videos uploaded during that period, 89.06% were removed before being viewed."

"Videos uploaded in the last six months of 2025 and removed for violating our CSAM policy accounted for 0.002% of total views of all videos uploaded in that period."

Also note in the "IWF Annual Report 2024.pdf" (https://www.iwf.org.uk/annual-data-insights-report-2024/) IWF found 291,273 URLs on the web confirmed to contain CSAM. In contrast, **not a single piece of CSAM was found on Pornhub – or indeed on any other of Aylo's platforms since the year 2021.**

The NCMEC reports regarding notifications sent by NCMEC to Responsive Service Providers (2021, 2022, 2023, 2024), demonstrates a leading position of Pornhub, with merely 1-3 notifications per year between 2021 and 2023 and no notification in 2024. Compare this to the volumes of notifications sent to other global hosting services and online platforms – which unlike Aylo are not even specifically focused on pornographic content: [redacted]

	[redacted] The number of notifications received from NCMEC is low as a positive result of our ever-evolving trust & safety measures and our intensified collaboration with NGOs over the years. In addition, the mitigation measures in place remove incentives for the upload of CSAM to Pornhub and significantly reduce the likelihood of onward distribution, not least because downloading content from the platform is not enabled. – **Minor likelihood (1)**
Overall assessment/ Salience Score	**Affected viewers:** • **Children before the age of adolescence: Medium - 11** • **Adolescents: Medium - 13** **Affected victims: Medium - 13**

10.1.2.3.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards. Emerging developments, particularly in the areas of AI and user-generated CSAM, will inform and strengthen Aylo's future mitigation strategy.

10.1.2.4 Conduct risk

The primary conduct risk that may arise on Pornhub concerns the possibility that minor users, where they hold user accounts, engage in interactions with other minor users by sending messages or posting comments that contain offensive, abusive, or otherwise harmful content. On Pornhub, this risk can only arise in connection with the creation and use of user accounts, as all communication functionalities are linked to registered accounts and users without an account are unable to send messages on the platform.

10.1.2.4.1 Inherent risk

Severity Score Assessment of scope, scale, and remediability	**Severity Score: 7**
	Scope - Number of affected minors: Affected minors would be all minors who own an account on Pornhub. However, this cannot be conclusively verified. Most users however use Pornhub anonymously, without account, profile or registration. Aylo considers it unlikely that minors hold user accounts on Pornhub and therefore assesses that only a slight proportion of the relevant population could be impacted. – **Smallest (1)**
	Scale - Seriousness of the impacts: In general, messaging functionalities may expose minors to serious conduct-related harms, including cyberbullying, harassment, coercive interactions, and other exploitative behaviors. – **Serious (3)**
	Remediability: The consequences are assessed as only partially remediable, since available interventions may reduce harm, but the evidence suggests that the effects, especially of cyberbullying, on minors can be severe, prolonged, and at times long-term but several measures, including open family communication, can mitigate the consequences (e.g. *Mohedo*, 2026, p. 16 https://www.mdpi.com/2227-9067/13/3/367). – **Possibly remediable (3)**
Likelihood The likelihood of the risk materializing	**High Likelihood - 4**
	In absence of any mitigation measures it cannot be excluded that minors would create accounts on Pornhub

	and initiate behavior resulting in conduct risks – **High Likelihood (4)**
Overall assessment/ Salience Score	**Medium – 11**

10.1.2.4.2 Mitigation measures in place

Aylos mitigation measures regarding user communication are described in **sections 7.1.2.19** and **7.1.2.11**.

10.1.2.4.3 Residual Risk

Severity Score Assessment of scope, scale, and remediability	**Severity Score: 7**
	Scope - Number of affected minors: **Smallest (1)** (no changes to inherent risk assessment)
	Scale - Seriousness of the impacts: **Serious (3)** (no changes to inherent risk assessment)
	Remediability: Possibly remediable (3) (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Minor Likelihood - 1**

	On Pornhub, users cannot use their accounts to message other users generally or to upload content. For creating an account, users must first of all access Pornhub by bypassing the age gate. Creators must verify their account as described in **section 7.1.2.2.** Messaging is limited to content creators who have completed verification of both their identity and age. As a result, the relevant communication functionality is restricted to interactions with verified account holders, which materially reduces the risk of engagement in unlawful or otherwise harmful activity. In addition, users cannot send photos or videos of any kind. Text-based communications are subject to filtering based on a banned-word list, which blocks the use of designated terms. Finally, the chat functionality includes reporting tools that enable users to report conversations directly. Overall, Aylo considers that it is highly unlikely that the risk materializes – **Minor Likelihood (1)**
Overall assessment/ Salience Score	**Low - 8**

10.1.2.5 Contact risks

The principal contact risk that may potentially arise on Pornhub is the risk that a minor is contacted by a malicious actor. On Pornhub, this risk can only arise in connection with the creation and use of user accounts, as all communication functionalities are linked to registered accounts and users without an account are unable to send messages on the platform.

10.1.2.5.1 Inherent risk

Severity Score Assessment of scope, scale, and remediability	**Severity Score: 6**

	Scope - Number of affected minors: Affected minors would be all minors that own an account on Pornhub. However, this cannot be conclusively verified. Most users however use Pornhub anonymously, without account, profile or registration. Aylo considers it unlikely that minors hold user accounts on Pornhub and therefore assesses that only a slight proportion of the relevant population could be impacted. – **Smallest (1)**
	Scale - Seriousness of the impacts: In general, messaging functionalities may expose minors to serious contact-related harms, including grooming and harassment. – **Serious (3)**
	Remediability: The consequences are assessed as only partially remediable. Available interventions, especially professional counselling, may reduce harm and support to minimize the negative impact (*Whittle*, 2013 (ujp.2013.010206-libre.pdf). – **Likely remediable (2)**
Likelihood The likelihood of the risk materializing	**High Likelihood - 4**
	In absence of any mitigation measures it cannot be excluded that minors would create accounts on Pornhub and be exposed to behavior resulting in contact risks – **High Likelihood (4)**
Overall assessment/ Salience Score	**Low – 10**

10.1.2.5.2 Mitigation measures in place

Aylos mitigation measures regarding user communication are described in **sections 7.1.2.19.**

10.1.2.5.3 Residual risk

Severity Score Assessment of scope, scale, and remediability	**Severity Score: 6**
	Scope - Number of affected minors: **Smallest (1)** (no changes to inherent risk assessment)
	Scale - Seriousness of the impacts: **Serious (3)** (no changes to inherent risk assessment)
	Remediability: Likely remediable (2) (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Minor Likelihood - 1**
	On Pornhub, users cannot use their accounts to message other users generally or to upload content. Messaging is limited to content creators who have completed verification of both their identity and age. As a result, the relevant communication functionality is restricted to interactions with verified account holders, which materially reduces the risk of engagement in unlawful or otherwise harmful activity. In addition, users cannot send photos or videos of any kind. Text-based communications are subject to filtering based on a banned-word list, which blocks the use of designated terms. Finally, the chat functionality includes reporting tools that enable users to report conversations directly. Overall, Aylo considers that it is highly unlikely that the risk materializes – **Minor Likelihood (1)**

Overall assessment/ Salience Score	**Lowest - 7**

10.1.2.6 Consumer risks

Consumer risks on Pornhub arise primarily from advertising displayed on the service, commercial communications by content creators, and, potentially, commercial offers made through chat functionalities. However, users are not able to conclude contracts directly with other users on Pornhub. Any risks associated with the features assessed in this category should therefore be understood primarily in conjunction with the broader risks previously identified in relation to illegal or harmful content. Accordingly, in this section Aylo focusses on the commercial risks for minors that result from the specific features.

10.1.2.6.1 Inherent risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 7** **Adolescents: 9**
	Scope - Number of affected minors: The scope is equivalent to that described in **section 10.1.2.1.1.1**, as the risk arises when minors access the service. • Children before the age of adolescence: **Small (2)** • Adolescents: **Large (4)**
	Scale - Seriousness of the impacts: The seriousness of the potential impacts depends on the content that is displayed in ads, commercial communication or content that minors could be exposed to in chats. Such exposure may

	create or reinforce an interest in accessing or acquiring certain content or services. As the potentially relevant commercial features are not directed at minors and do not enable purchases directly on Pornhub, Aylo takes the view that the features could be associated with adverse impacts for minors. – **Serious (3)**
	Remediability: The negative effects can be remediated by deleting the content or suspend accounts associated with the content. As the potential transactions do not take place on Pornhub, Aylo is not involved in any measures that could include renumeration and could remedy the negative impacts completely. However, such possibilities exist and therefore Aylo considers that remedy is likely to return those affected to the same or equivalent position as before. Aylo considers that remedy is likely to return those affected to the same or equivalent position as before. – **Likely remediable (2)**
Likelihood The likelihood of the risk materializing	**Some likelihood - 2**
	While it cannot be fully excluded that malicious actors would somehow target users, including minors with content that could potentially result in the materialization of consumer risks, Aylo considers the chances of occurrence to be minor. – **Some likelihood (2)**
Overall assessment/ Salience Score	**Children before the age of adolescence: Low - 9** **Adolescents: Medium - 11**

10.1.2.6.2 Mitigation measures in place

Ads are subject to the same controls as content (as described in **section 11.1.2**). Commercial communication is subject to the same controls as commercial communication is content.

10.1.2.6.3 Residual risk

Severity Score Assessment of scope, scale, and remediability	**Children before the age of adolescence: 7** **Adolescents: 9**
	Scope - Number of affected minors: • Children before the age of adolescence: **Small (2)** (no changes to inherent risk assessment • Adolescents: **Large (4)** (no changes to inherent risk assessment
	Scale - Seriousness of the impacts: – **Serious (3)** (no changes to inherent risk assessment)
	Remediability: Likely remediable (2) (no changes to inherent risk assessment)
Likelihood The likelihood of the risk materializing	**Minor likelihood - 1**
	Aylo is not aware of any circumstances giving rise to risk associated with commercial risks for minors. In light of Aylo's strong mitigation measures Aylo believes it is highly unlikely that the risk materializes. – **Minor likelihood (1)**
	Children before the age of adolescence: Lowest - 8 **Adolescents: Low – 10**

Overall assessment/ Salience Score	

10.1.2.7 Cross-cutting risks

Cross-cutting risks could potentially include privacy risks, risks deriving from AI and technologies and other risks for physical and mental health. Aylo does believe that there are no further specific risks deriving from Pornhub that would fall into this category and that are not assessed elsewhere in this assessment.

10.1.2.8 Specific impact on minors of overarching Article 34(2) DSA risks

Aylo believes that there are no minor specific risks deriving from the overarching risks listed in Article 34(2) DSA.

10.1.2.8.1 Recommender systems

The risk associated with Aylo's recommender systems are assessed in **section 11.2.** As of Aylo's strong measures to prevent illegal content from being shared on Pornhub and Aylo's limited personalisation, the risk is limited.

10.1.2.8.2 Content moderation systems

Aylo’s content moderation systems make a very substantial contribution to offering a safe online environment for all Pornhub users as described in several sections for example in **sections 7.1.3** and **7.2.3**.

10.1.2.8.3 Applicable terms and conditions and their enforcement

Aylo is enforcing the terms and conditions with the age gate in place and the RTA label. As set out in **section 10.1.3.2** the enforcement is not immune to circumvention.

10.1.2.8.4 Systems for selecting and presenting ads

The risks associated with Aylos's ad delivery systems are described in **section 11.1.** Aylo has Aylo also has a wide range of moderation measures in place for advertisements that filter out illegal content, including a manual review of all advertising campaigns.

10.1.2.8.5 Data related practices

As set out in **section 8.3** data related practices pose low risks to users.

10.1.2.8.6 Intentional manipulation of the service

Due to Aylo's strong verification process for uploading users and performers as described in **section 7.1.2.2**, the risk manipulation is low on Pornhub.

10.1.2.8.7 Amplification and potentially rapid dissemination of illegal content and of information that is incompatible with the terms and conditions

For Pornhub, the risk that the service facilitates the amplification or rapid dissemination of illegal content, or of information incompatible with Pornhub's Terms and Conditions, is limited. Unlike social media services, Pornhub is not designed around features that promote virality or wide-scale dissemination, such as "trending" or similar mechanisms for rapid content amplification. In addition, content is subject to Aylo's robust upload controls as set out in **section 7.1.2.5**, and uploaders are required to undergo account verification, as set out in **section 7.1.2.2**. Taken together, these features materially reduce the likelihood that the service can be used for such purposes and, accordingly, that the relevant risk materialises.

10.1.2.9 Identification of additional measures

Aylo's mitigation framework is designed to promote a safe, trusted, and responsible online environment for users. Where minors may circumvent access restrictions in isolated cases, these safeguards are intended to minimize the likelihood of exposure to more harmful material that may be available on less controlled services and therefore improve the security of minors. Also, Aylo's mitigation measures effectively prevent that any incentive is resulting from the provision of Pornhub to create and share CSAM. Viewed within the broader ecosystem of adult content platforms, the risk to minors is therefore assessed as falling within the lowest risk cohort.

The risks associated with minors accessing adult content cannot be mitigated only by looking at Pornhub without considering the context of the entire and broader online ecosystem. Aylo has implemented measures its views as reasonable, proportionate and effective, given the current ecosystem and available technology. To mitigate the specific risks deriving from Pornhub, and especially for pre-adolescents, Aylo has introduced the RTA label and put an age gate in place. These measures are designed to be effective for pre-adolescents, in particular by preventing unintended access to Pornhub. For adolescents, by contrast, risks of intentionally accessing age-restricted content do exist. These potential remaining risks associated with intentional access by minors could be effectively mitigated by introducing strict age verification. Introducing this additional measure is subject to it being

reasonable, proportionate and effective to ensure a high level of privacy, safety, and security of minors which is assessed in the **section 10.1.3** below.

10.1.3 Reasonable, proportionate and effective mitigation measures

Aylo determines whether measures adopted or considered in response to the identified minor-related risks are appropriate and proportionate within the meaning of Arts. 28 and 35 DSA, as further informed by Section 5 of the Guidelines.

In line with the objectives of the DSA and the Guidelines, Aylo approaches proportionality and appropriateness through a holistic systemic risk lens by taking into consideration the ecosystem-specific realities of the dissemination and consumption of adult content online, beyond Pornhub, as set out in detail in **section 4.1**. This means that our analysis does not stop at consequences that can manifest directly on the platform. It also considers foreseeable downstream and indirect consequences that may occur beyond the platform and are plausibly connected to Pornhub.

10.1.3.1 Strict age verification on Pornhub is neither reasonable, proportionate, nor effective to date, and therefore not lawfully owed under Article 35 DSA

On the basis of its holistic assessment of all relevant rights and legitimate interests under the DSA and grounded in Aylo's long-standing industry expertise, and in particular its many first-hand experiences with the introduction of age verification measures across multiple jurisdictions and in different nuances, Aylo concludes that it is neither reasonable, proportionate, nor effective to implement strict age verification measures, such as ID-based systems, on Pornhub at the point in time where this risk assessment is due.

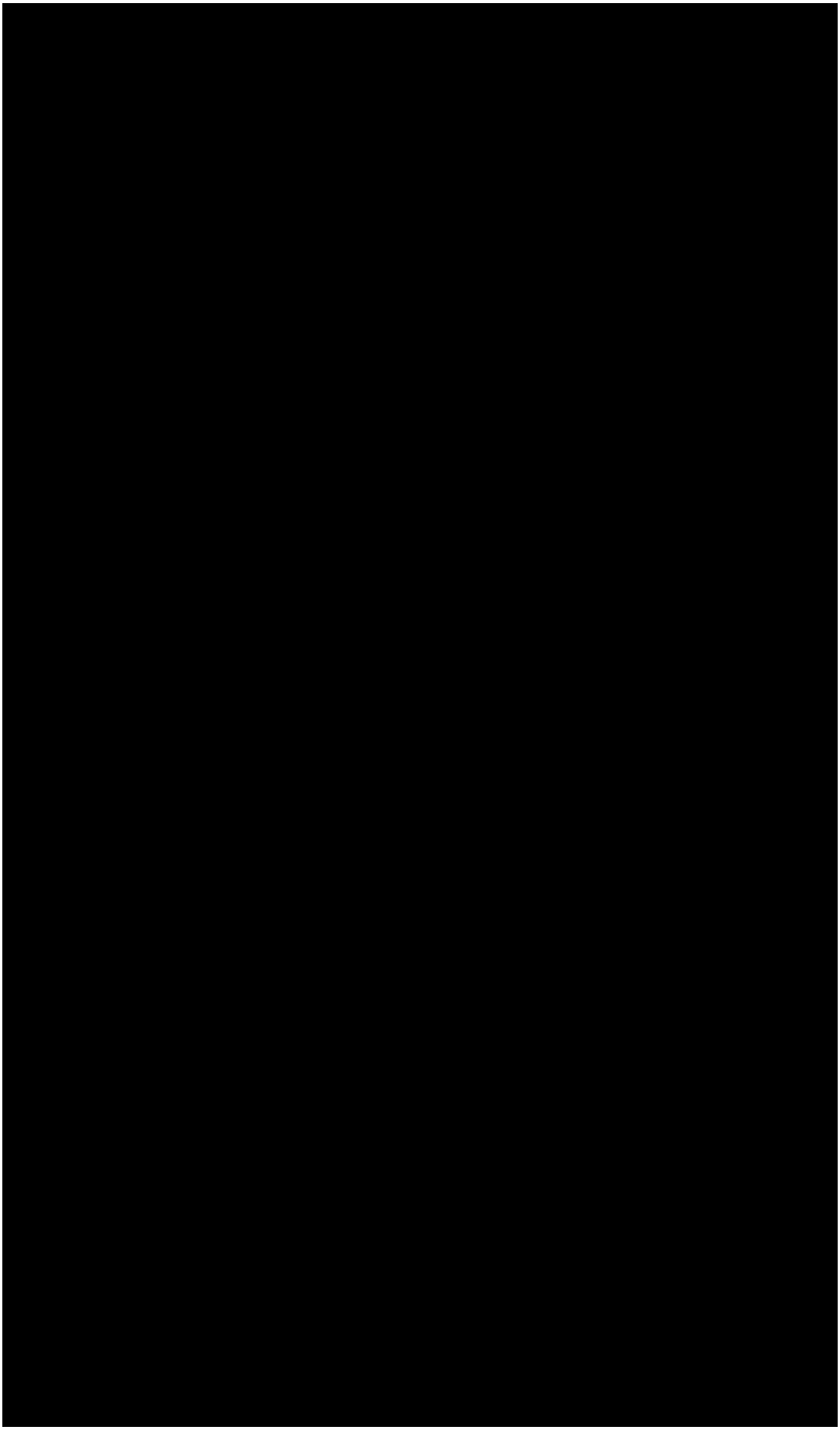
Mitigation measures can only be proportionate if (a) they are genuinely effective in achieving their protective objective and (b) these positive effects outweigh their negative consequences.

On this basis, Aylo concludes that the implementation of strict ID-based age verification on Pornhub would be **ineffective**, especially given the extreme adverse impacts directly resulting from implementing this mitigation measure. In essence, strict age verification is – at the point in time and in the overall regulatory and enforcement context of this risk assessment – fundamentally incapable of meaningfully reducing the overall exposure of minors to pornographic content and carries a very real and grave risk of driving minors, as well as adult Pornhub users, to the countless unrestricted, less compliant and less safe sites that disseminate adult content to EU users and globally.

Moreover, introducing age verification would also be **disproportionate**: Based on Aylo's firsthand experiences with introducing age verification on Pornhub, the certain result would be a near-total loss of Pornhub's EU user-base. Age verification, if introduced under the regulatory and enforcement realities existing today, would effectively eliminate Aylo's business in Europe.

This most extreme – because of expropriating effect – restriction of Aylo's freedom to provide services in the EU could only be justified by overriding benefits to EU users. Such benefits do not exist. On the contrary: The introduction of age verification on those adult content platforms that are readily compliant has been proven every single time to simply drive users to less and non-compliant sites where users can consume adult content without limitations. The consequence is a steep decline in the levels of protection both for minors and for adult users.

If Aylo were to implement age verification, the overall consumption of pornographic content and its potential access by minors, is unlikely to be meaningfully reduced. Equally, the exposure of minors to pornographic content will not be reduced. The demand for pornographic content is fundamental, persisting, and strong; and is met by hundreds of thousands if websites making it freely available. Consuming pornographic content online is a mainstream interest that is distributed broadly across all demographics; confirming that sexual curiosity drives user behavior as a powerful and constant force. At the same time, users are expecting high standards of privacy protections, as they treat their adult content consumption habits as highly private and sensitive. Therefore, any measures that require the constant and repeated sharing of personal identifiable information are met not just with reluctance, but with immediate and pronounced avoidance. In a market where content is easily replicable and interchangeable and where users are not prevented by any network effects (which create strong user retention for all social networks) to move from one platform to the other, users can, and will, easily and swiftly migrate to one of the many available services without any access restrictions and minors protections in place. [redacted]



The latest scientific statements and studies on the impacts of implementing age verification raise comparable concerns (see, for instance, the Joint statement of security and privacy scientists and researchers on Age Assurance, 2026, which has been signed by 438 persons and organisations, https://csa-scientist-open-letter.org/ageverif-Feb2026). The raised concerns are mainly that age verification systems can be easily circumvented using methods like VPNs, proxy websites or by using another person's identity credentials. The solution to solve these limitations would be the development of an internet-wide trust infrastructure that is capable of effectively preventing circumvention techniques. The European Commission's Age Verification App, the development of which Aylo has been supporting from the start, and the upcoming EU Digital Wallet, are set to create such an infrastructure – once they will have been adopted with a sufficient coverage threshold across the EU (and beyond). Also see **section 10.1.4** for further details on Aylo's support of the European Commission's Age Verification App.

Additionally, as observed both by scientists (see, for instance, *Spencer*, 2025, p. 6, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=5165280) and by Aylo's own repeated experience, user traffic would instantly and easily shift away from Pornhub as soon as age verification is implemented, and users will seamlessly move to other sites offering adult content, but without any access restrictions in place, and typically also lacking a robust compliance framework, consumer protection, and content moderation (*Lang*, 2026, p. 12, https://journals.sagepub.com/doi/10.1177/2755323X251415424).

These known dynamics of the adult content online industry would therefore significantly reduce the level of protection of minors (as well as that of adult users) as soon as age verification is introduced only by the few compliant platforms, including Pornhub. They would promptly be replaced by the thousands of noncompliant platforms that outnumber the compliant providers at a vast scale.

Recognizing the unique realities of the adult content online industry and the inability of any single provider to solve these challenges for the entire ecosystem of adult content sites, Aylo has consistently advocated that robust, effective, proportionate and privacy preserving age verification can only be achieved through a comprehensive, legally mandated framework that applies to all stakeholders, is applied at the device level, and is consistently enforced. This position is manifested in Aylo's ongoing

exchanges with numerous regulators across many jurisdictions, in which Aylo has consistently identified the market dynamics that render isolated, unilateral actions ineffective. Aylo has on multiple occasions submitted concrete, actionable proposals to regulators, including the European Commission, outlining how an effective, interoperable, and privacy-preserving age verification framework could be practically achieved. To that end, Aylo has also been working with the European Commission from the start to support its technical development and deployment of the EU Age Verification App as precursor to the upcoming EU Digital Wallet. This history of intense and consisteint engagement underscores Aylo's long-standing objective of implementing even more effective mitigation measures as soon as the corresponding regulatory and enforcement landscape required to render these measures effective will be in place.

10.1.3.2 Self-declaration age gate is a reasonable, proportionate and effective mitigation measure

Self-declaration age gating is a reasonable, proportionate and effective measure where it is directed to those minors who unintentionally land on the Pornhub landing page. For this group of minors - who often are also the particularly vulnerable younger age group - the disruption effected by the age gate, combined with the clear statement in the age gate banner that the website may only be accessed by adults, and the requirement to confirm being of legal age is an effective measure to prevent such unintentional access.

An unintentional underage visitor will with high likelihood refrain from falsely declaring themselves to be of legal age to enter a website with pornographic content which they had no intention of accessing in the first place. This conclusion is also supported by Aylo’s internal platform data on users declaring they were under 18 at the age gate as explained above **in section 10.1.2.1.1.3**.

Aylo's position that the age gate is effective in preventing unintended access is backed by scientific studies. *Happ/Harpenau/Wiewiorra* (2024, page 36, https://www.wik.org/en/publications/publication/working-paper-nr-9-oekonomie-und-regulierung-von-pornografischen-online-inhalten) state that "*all of these methods* (including self-declaration) *would at least provide protection for minors unintentionally accessing pornographic content*".

Since the research findings presented above **in section 10.1.2.1** demonstrate that the potential harm is typically higher the younger the underage person, this measure is of disproportionately high value for protecting those minors from harm who benefit the most from such

protection - both because they do not wish to be exposed to adult content, and because their younger age makes them more vulnerable.

For minors that are willing to bypass the age gate, self-declaration is not immune to circumvention (just as strict age verification is not immune). Those minors are typically associated with the group of minors that would simply move to other, unrestricted, adult content sites or use technical means (VPN, Tor Browser, etc.) to bypass age assurance, including hard age verification. The risks associated with this group of minors accessing adult content is lower though.

Aylo also acknowledges that enforcement of the minimum age requirement of 18 years, as set out in its Terms and Conditions, cannot be ensured seamlessly as the age gate is not immune to circumvention. Aylo therefore agrees that more effective mitigation measures which, from a holistic perspective, aim to reduce risks to minors across the wider ecosystem as well as on Pornhub in an effective, proportionate, and reasonable manner, are possible and must be implemented.

10.1.3.3 The RTA label is a reasonable, proportionate and effective mitigation measure

While Aylo recognises that the overall level of effectiveness of the RTA label and generally, of the enabling of parental control and/or website filtering features depends on parental intervention the RTA label is a very strong form of protection if this parental tool is activated. When filtering software is enabled that blocks RTA-labeled websites, the entire Pornhub platform – including its landing page and all subpages – is completely blocked. It provides another layer of effective incremental protection in the overall context of Aylo's measures aimed at protecting minors. Implementing the RTA label affects Pornhub's appearance in search results and enables blocking of access to Pornhub on devices for which parental control settings are activated.

Aylo is not in a position to identify or estimate the number of unsuccessful attempts to access Pornhub that have been prevented by parental control measures, because in these instances, the user is blocked before any access request can reach Aylo's servers - meaning that Aylo is unable to count such attempts to access the website. But there is a basis in scientific literature that justifies the conclusion that the RTA label makes a valuable contribution. Several studies suggest that parents are aware of forms of protecting children online by technical means and actively use tools (https://www.ofcom.org.uk/media-use-and-attitudes/media-habits-children/children-and-parents-media-use-and-attitudes-report-2024;

https://www.internetmatters.org/hub/news-blogs/research-tracker-awareness-usage-parental-controls/; https://fundacionorange.es/infancia_y_adolescencia_entornos_digitales/Infancia y Adolescencia en Entornos Digitales.pdf). Therefore, Aylo believes that the RTA label is an additional effective layer of incremental protection in the overall context of Aylo's measures aimed at protecting minors.

10.1.4 Future measures to increase the protection of minors

Aylo welcomes the European Commission's Preliminary Findings as a valuable opportunity to reinforce the measures currently implemented by Pornhub to protect minors, including the age gate and the RTA label. This thorough reassessment is designed to further strengthen Aylo's existing mitigation framework and to ensure the continued deployment of effective, proportionate, and reasonable safeguards that uphold the protection of minors on Pornhub and across the broader online ecosystem.

Aylo is fully committed to supporting the development of, and implementing, all mitigation measures that can effectively protect minors from online exposures to adult and other age restricted content, whilst protecting adult users from undue interference with their privacy rights and from being compelled to access adult content on unrestricted and typically unprotected sites.

Accordingly, Aylo is the **first platform stakeholder participating in the European Commission's pilot scheme for the development and launch of the EU age verification app.** By operating independently of device- or operating-system-level configurations, the EU age verification application enables users to confirm age eligibility through an anonymous 18+ token without transferring identifiable personal data to the platform. This design materially reduces exposure to systemic risks, including data breaches, unauthorized profiling practices, and identity-related fraud.

Fundamentally, we believe that the real solution for protecting minors and adults alike is to **verify users' ages once on their devices**, at the point of access to the internet, and to deny or permit access to all and any age-restricted materials and websites based on that **single, privacy-preserving verification**. Such device-based age verification refers to any approach where the personal information that is used to verify the user's age is either shared in-person at an authorized retailer upon purchase of a new device, inputted locally into the user's device, or stored on a network controlled by the device manufacturer or the supplier of the device's operating system. Whether through pre-installed content blocking and filtering software, the disabling of web-browsing permissions, or other means, the user will then be prevented

from accessing age-restricted content of any kind over the internet unless they are age-verified.

This device-level approach would effectively represent the backbone to protect minors from age-restricted content across the entire internet while at the same time minimizing the transmission of personal data. It by necessity requires the cooperation of device manufacturers and operating system providers.

Aylo supports device-level age verification because it would control the severe risks inherent in making every single individual site with age restricted content responsible for implementing and maintaining its own age verification systems, and requiring consumers to repeatedly present their ID or undergo biometric processing.

The technology to accomplish this exists today.

(1) Upon initial activation of a device, or through mandatory software update, the device's operating system shall automatically enable parental control features including restriction to access adult content websites.

- In March 2026, Apple deployed this for UK-based mobile and tablet devices.

(2) Each device shall allow users to undergo age assurance to determine the user's age. Based on the determined age or age range of the user, it shall appropriate disable parental controls.

- We may propose here, that the EUDI Wallet be used to facilitate this age determination process.

(3) Each device shall provide websites, applications, search engines, and online services with a signal or token indicating the user's age or age range.

- Both Apple and Google support functionality that allows for the sharing of age signals with applications. It must be extended to websites.
- Additionally, the EUDI Wallet could be used to provide this signal.

(4) Until age assurance has been conducted or completed, the device shall set the user's age category to under thirteen years and enable the corresponding parental controls automatically.

(5) Any website, application, search engine, or online service that offers any content or services that may not be suitable for all users, must request, recognize and allow for the receipt of the age signal, treat the signal as the primary indicator of a user's age, and make available only content that is appropriate for that age range.

Applications using Apple age signals through Apple's declared range API, are already doing this

Apple introduced age verification into their services in the autumn of 2023 in the U.S. According to Apple's announcement at the time, "businesses will be able to accept IDs in Apple Wallet — no additional hardware needed. This will streamline their ability to securely check a customer's age in person for things like alcohol purchases or to verify a customer's identity at checkout for car rentals, and more."

Aylo supports the "opt-out" approach by which **age-based blocks on inappropriate content would be turned on by default and would require a verified adult to turn the filter off**. This solution would be far more effective than the current "opt-in" patchwork approach in which only a fraction of sites hosting age-restricted content have any kind of age-gating or content-blocking options available to help parents effectively block their children from accessing. Notably, on 25 March, 2026, Apple announced their deployment of this functionality for all UK Apple account holders: https://support.apple.com/en-gb/126788.

This device-level solution is a 360-degree solution that stops access to age-restricted content at source and protects the privacy of users by not requiring them to provide their personally identifiable information across multiple websites.

Importantly:

- It prevents access to all adult content websites at once, globally.
- Adult website filtering cannot be circumvented by VPN usage.
- It requires one single point of age verification per user.
- It does not promote the perpetual and repeated sharing of personal data and thus is consistent with data minimization principles.

It allows websites and platforms with mixed age rating content or features, such as social media platforms, to provide age-appropriate content or feature visibility only, based on the device user's age range.

In sum, age verification at device level provides the strongest possible protection preventing minors from accessing inappropriate sites, protects users' privacy rights, and can be easily, fairly, and consistently applied to and enforced across, all platforms disseminating age restricted content of any kind, and including adult content.

10.1.5 Conclusion of Aylo's assessment of negative risks in relation to minors

Considering the above, Aylo takes the view that under the regulatory and enforcement realities existing today and within the context of the ecosystem, Pornhub has taken reasonable, proportionate and effective mitigation measures to mitigate the risk related to Pornhub to the extend reasonably possible. As outlined above, Aylo is continuing its ongoing engagement with the goal to support designing effective risk mitigation, which Aylo could never achieve on their own with any unilateral measure that Aylo may implement for Pornhub.

10.2 Porn addiction

Porn addiction is often described as a problematic pattern of compulsive and uncontrolled consumption of pornographic material. This risk is only applicable to a subset of users and should not be assumed as a general or inherent outcome of exposure.

However, “porn addiction” is not a scientifically established or formally qualified medical condition. European clinical frameworks, including those of the World Health Organization, do not recognise it as a distinct disorder, and there is no clear clinical consensus that it meets the criteria of an addiction in the same way as substances or gambling. While some individuals may experience problematic or compulsive patterns of use, these are typically considered under broader categories—rather than as a standalone, validated diagnosis—meaning the term “porn addiction” remains a contested and non-standard label in scientific and medical literature.

There is, correspondingly, limited agreement within the psychological field that “porn addiction” constitutes a distinct, treatable condition. A number of studies suggest that problematic porn use may instead reflect underlying issues such as compulsive behaviour, anxiety, depression, or relational difficulties, rather than a primary addiction.

For example, research discussed in Psychology Today – Is Porn Addiction Really a Disorder? notes:

“The problematic porn or self-described ‘porn addiction’ use can be viewed more as a symptom of deeper psychiatric issues and/or relational conflicts the person has with others.”

Similarly, Psychology Today – Science Stopped Believing in Porn Addiction. You Should, Too highlights that perceived addiction is often linked to moral or cultural conflict rather than clinical dysfunction:

“*Having moral conflict over your porn use (PPMI) does turn out to be bad for you. But that's not because of the porn. Instead, higher levels of moral conflict over porn use predict higher levels of stress, anxiety, depression, and diminished sexual well-being, as well as religious and spiritual struggle*”

Additional academic work supports this framing. For instance, research on Problematic Pornography Use Model (PPMI) (e.g. Grubbs et al.) finds that self-perceived addiction is strongly associated with moral incongruence rather than behavioural dysregulation alone:

- Grubbs et al. (2019) – Moral incongruence and perceived addiction

- WHO ICD-11 – Compulsive Sexual Behaviour Disorder

Taken together, the current scientific evidence indicates that while some individuals may experience problematic patterns of use, “porn addiction” itself is not a formally recognised disorder and is better understood as a contested, non-standard label that may reflect broader psychological or contextual factors.

10.2.1 Inherent risk

Severity Assessment of scope, scale, and remediability	**Severity score: 7**
	Scope - Affected users: Affected could potentially every person accessing Pornhub. Not every user is at risk of developing symptoms that could be associated with porn addiction though. – **Medium (3)**
	Scale: Porn addiction could create moral conflicts. – **Moderately serious (2)**
	Remediability: Cessation of porn use can help remedy and restore the prior situation. – **Likely Remediable (2)**
Likelihood The likelihood of the risk materializing	**Likelihood: 2**
	The effects and intensity of a possible porn addiction vary. This and the conflicting opinions of experts aggravate measurement. There is little agreement by those in the psychology field, that porn addiction is a treatable problem. In fact, many studies suggest that porn addiction is a symptom of a deeper problem (https://www.psychologytoday.com/us/blog/sex-esteem/202101/is-porn-addiction-really-a-disorder, https://www.psychologytoday.com/us/blog/women-who-stray/201808/science-stopped-believing-in-porn-addiction-you-should-too).

	The risk of a person becoming addicted to pornography appears to be based upon multiple external factors, not least their moral objection to pornography. – **Some Likelihood (2)**
Overall assessment/ Salience Score	**Low - 9**

10.2.2 Mitigation measures in place

10.2.2.1 Sexual Wellness Center

- Our Sexual Wellness Center deals with many sexual health topics in an open, honest, and educational manner, as set out in **section 7.7.2.9**
- Regarding addiction the center contains:
    - Podcast: Is Porn Addiction Real? In this episode of the podcast, Dr. Laurie discusses the question, “Is Porn Addiction Real?
    - Podcast: Sex Addiction Is On The Rise In this podcast episode, Dr. Laurie discusses how sex addiction is on the rise with guest David Essel.
    - Understanding Sex Addiction This video challenges the use of the words “sex addict” and explains why sex addiction, at least as a mental health definition, does not exist as well as how it stigmatizes any sex that is deemed “wrong” by our culture. Instead, I talk about sexual behavior that feels out of control, what to do about it, and how to get support from a professional who will not shame diverse sexual practices.
    - Q&A With Dr. Laurie: When Does It Go Too Far?

10.2.3 Residual risk

Severity	

Assessment of scope, scale, and remediability	**Severity score: 7**
	Scope - Affected users: **Medium (3)** (no changes to inherent risk)
	Scale: Moderately serious (2) (no changes to inherent risk)
	Remediability: **Likely Remediable (2)** (no changes to inherent risk)
Likelihood The likelihood of the risk materializing	**Likelihood: 2**
	Some Likelihood (2) (no changes to inherent risk)
Overall assessment/ Salience Score	**Low - 9**

10.2.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

10.3 Negative effects on relationships

Pornography usage in relationships can present positive and negative effects and a key factor appears to be an individuals moral opinions on pornography. This risk is only applicable for users.

How Porn Affects Relationships | Psychology Today – “In the end, it appears that *whether porn viewing helps or hurts intimate relationships depends instead on the attitudes the partners have about it. If you already believe porn to be evil, you’ll likely suffer guilt and remorse over your own use, as well as feelings of anger and*

betrayal over finding your partner using it. But if you have open and healthy attitudes about your own and your partner's sexuality, then you're likely to use porn in ways that enhance your relationship with your significant other.

How Porn Affects Relationships | Psychology Today – *"The most important finding to come out of the data analysis was the fact that porn use was completely unrelated to relationship satisfaction. In other words, there* was *no evidence that porn viewing led to decreases in how happy people are with their partners, nor did they seem to be using porn as a way of making up for deficiencies in their relationships".*

10.3.1 Inherent risk

Severity Assessment of scope, scale, and remediability	**Severity score: 7**
	Scope - Affected users: Affected could be any user accessing Pornhub. – **Large (4)**
	Scale: The number of factors influencing relationships are manyfold. We are not aware that the use of Pornhub has a notable impact on relationships. – **Least serious (1)**
	Remediability: Cessation of porn use can help remedy and restore the prior situation. – **Likely Remediable (2)**
Likelihood The likelihood of the risk materializing	**Likelihood: 2**
	The risk of a person's relationships being affected by their pornography usage appears to be based upon multiple external factors, not least their moral objection to pornography. – **Some Likelihood (2)**
Overall assessment/ Salience Score	**Low - 9**

10.3.2 Mitigation measures in place

10.3.2.1 Sexual Wellness Center

- Our Sexual Wellness Center deals with many sexual health topics in an open, honest, and educational manner, as set out in **section 7.7.2.9**
- Regarding relationships the center contains:
    - Is Porn Cheating? Watching porn can be great and even fun if you view it as a movie, and if everyone in the relationship is okay with it. However, if you notice your partner sneaking around to view porn, it would be good to discuss “is porn cheating?” instead of accusing him/her of cheating. Remember that communication in the relationship is the most important thing, and don’t be afraid to ask for professional help if you think it is necessary**.**

10.3.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Severity score: 7**
	Scope - Affected users: **Large (4)** (no changes to inherent risk)
	Scale: Least serious (1) (no changes to inherent risk)
	Remediability: **Likely Remediable (2)** (no changes to inherent risk)
Likelihood The likelihood of the risk materializing	**Likelihood: 2**
	Some Likelihood (2) (no changes to inherent risk)
Overall assessment/ Salience Score	

	Low - 9 The risk of pornography use affecting relationships is not something which can be fully mitigated as it stems from other problems in a person's life.

10.3.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

10.4 Frustration due to unrealistic expectations

Frustration due to unrealistic expectations encompasses consequences of unrealistic expectations about sexual relations. This risk is only applicable for users.

When acted out by consenting adults in safe environments and adhering to our Terms of Service, desires, fetishes and fantasies are welcomed and supported on our platform. Pornography does not always represent sexual interactions and behaviours typical of everyday life and can depict diverse fantasies and role-play by consenting amateurs and professionals.

Learn more about our Core Values.

10.4.1 Inherent risk

Severity Assessment of scope, scale, and remediability	**Severity score: 7**
	Scope - Affected users: Affected could be any user accessing Pornhub. – **Large (4)**
	Scale: The impact on users that may left frustrated due to their unrealistic expectations of sex based upon pornography usage is unclear. We are not aware that the use of Pornhub has a notable impact on frustration due to unrealistic expectations. – **Least serious (1)**

	Remediability: There will be some remedy of potential damage if a user ceases to watch the pornography that they believe is frustrating them. – **Likely Remediable (2)**
Likelihood The likelihood of the risk materializing	**Likelihood: 2**
	The risk of a person gaining unrealistic expectations based upon pornography viewing is unknown and differ individually. – **Some Likelihood (2)**
Overall assessment/ Salience Score	**Low - 9**

10.4.2 Mitigation measures in place

10.4.2.1 Freedom of Sexual Expression

- Freedom of sexual expression is one of our core values, and we make clear that pornography does not always represent sexual interactions and behaviours typical of everyday life.
- It is important for content creators to be permitted to post content within the bounds of our terms of service to allow freedom of sexual expression.
- In mainstream media, depictions of realistic illegal acts are permitted under the form of entertainment, e.g. violent murders within multiple Hollywood movies and TV shows. Our platform does not feature any illegal acts but are presented with the understanding that a viewer should treat the content as a fantasy, not reality.

10.4.2.2 Sexual Wellness Center

- Our Sexual Wellness Center deals with many sexual health topics in an open, honest, and educational manner, as set out in **section 7.7.2.9**
- Regarding unrealistic expectations the Center contains:

- Q&A With Dr. Laurie: Expectation Vs Reality (pornhub.com)
- Q&A With Dr. Laurie: Fantasy Vs. Reality (pornhub.com)

10.4.2.3 Generative Artificial Intelligence (GenAI) content

See **section 7.2.2.15** for Aylo's mitigation measures regarding AI-generated content.

10.4.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Severity Score: 7**
	Scope - Affected users: **Large (4)** (no changes to inherent risk)
	Scale: Least serious (1) (no changes to inherent risk)
	Remediability: **Likely Remediable (2)** (no changes to inherent risk)
Likelihood The likelihood of the risk materializing	**Likelihood: 2**
	Some Likelihood (2) (no changes to inherent risk)
Overall assessment/ Salience Score	**Low – 9** The risk of pornography use leading to unrealistic expectations cannot be fully mitigated. Pornography is legal and should allow freedom of sexual expression.

10.4.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

11 Overarching factors

11.1 Illegal advertising

Our advertising is subject to the same controls as our content, i.e. a plethora of moderation tools and human moderation before adverts can be offered on the platform. This risk is only applicable for users.

We permit advertising from NGOs who provide services to help change problematic user behaviour (e.g. those looking for CSAM or NCC), which is displayed across our platforms in multiple geos.

11.1.1 Inherent risk

Severity Assessment of scope, scale, and remediability	**Severity score: 9**
	Scope: Affected could be any user accessing Pornhub. – **Large (4)**
	Scale: If ads including illegal or harmful content were spread around the service, this could – depending on the content – have serious impacts on the user who see the ads. – **Serious (3)**
	Remediability: The situation can be largely reversed if the adverts are removed from the platform in time. – **Likely Remediable (2)**
Likelihood The likelihood of the risk materializing	**Likelihood: 2**
	Aylo is not aware of any circumstances giving rise to ad delivery risks. While it cannot be fully excluded that malicious actors would misuse the ad delivery systems for

	spreading illegal or harmful content, Aylo considers the chances of occurrence to be minor. – **Some Likelihood (2)**
Overall assessment/ Salience Score	**Medium - 11**

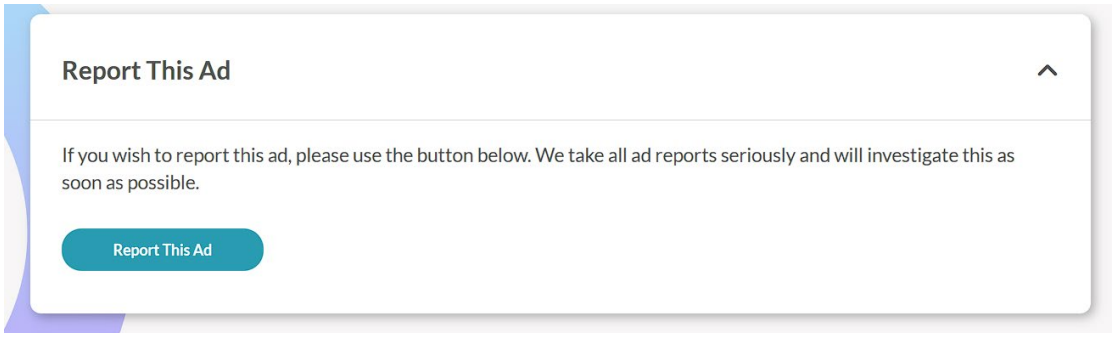
11.1.2 Mitigation measures in place

11.1.2.1 Preventing harmful material

- All our advertising is subject to moderation prior to being published on the platform.
- Please see our robust mitigation measures already in place per our risk assessments on dissemination of illegal harms (see **section 7.1.2**).

11.1.2.2 Reporting

- All users (logged in or not) can report adverts that they believe contain illegal, inappropriate or copyright material. This is achieved by clicking on the “Ads” portion of the advert in the top right corner and then choosing Report this Ad.



11.1.3 Residual risk

Severity	**Severity score: 9**

Assessment of scope, scale, and remediability	
	Scope - Affected users: **Large (4)** (no changes to inherent risk)
	Scale: Serious (3) (no changes to inherent risk)
	Remediability: **Likely Remediable (2)** (no changes to inherent risk)
Likelihood The likelihood of the risk materializing	**Likelihood: 1**
	Aylo is not aware of any circumstances giving rise to risk associated risks. In light of Aylo's strong mitigation measures Aylo believes it is highly unlikely that the risk materializes. – **Minor likelihood (1)**
Overall assessment/ Salience Score	**Low - 10**

11.1.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.

11.2 Recommender Systems spreading illegal content

Theoretically, a risk regarding recommender systems can be to amplify the visibility of illegal and/or harmful material. This risk is only applicable for users.

The content on our platform is carefully moderated using a plethora of tools and human moderation.

Our recommender systems cannot push people towards illegal, harmful material due to the robust moderation tools we have in place. The likelihood of such content existing on our platforms is very low, contrary to what may occur on social media platforms. Additionally, recommendations based on personalization are very limited, because recommendations are based on very limited data points.

11.2.1 Inherent risk

Severity Assessment of scope, scale, and remediability	**Severity score**: **11**
	Scope: Affected could be any user accessing Pornhub. – **Large (4)**
	Scale: If harmful content was amplified by the recommender systems – depending on the content (e.g. CSAM) – have serious impacts on the user who see the content. – **Very serious (4)**
	Remediability: The situation can be largely reversed if the content is removed from the platform in time or by an affected user turning off the recommender system. – **Possibly Remediable (3)**
Likelihood The likelihood of the risk materializing	**Likelihood: 2**
	It cannot be fully excluded that malicious actors would misuse Pornhub for spreading illegal or harmful content, which could be amplified by the recommender systems causing risks to materialize. – **Moderate Likelihood (2)**
Overall assessment/ Salience Score	**Medium - 13**

11.2.2 Mitigation measures in place

11.2.2.1 Preventing harmful material

- Please see our robust mitigation measures already in place per our risk assessments on dissemination of illegal harms, many of which far exceed those used on social media platforms harms (see **section 7.1.2**). Two important aspects to note are:
    - Our banned words service which proactively blocks searches for illegal material, despite our platform having a very low change of offering such content in the first place.
    - Deterrence messaging, which is returned against a large list of banned words associated with certain types of illegal material, so that users are educated on the illegality and can seek help from one of our NGO partners to change their behaviour.

11.2.2.2 Ability to turn off recommender systems

- As detailed in our guidelines, a user can turn off personal recommendations by selecting the option in the hamburger menu on the platform. (See Recommender System Guidelines (pornhub.com))

11.2.3 Residual risk

Severity Assessment of scope, scale, and remediability	**Severity score**: **11**
	Scope - Affected users: **Large (4)** (no changes to inherent risk)
	Scale: Very serious (4) (no changes to inherent risk)
	Remediability: **Possibly Remediable (3)** (no changes to inherent risk)
Likelihood The likelihood of the risk materializing	**Likelihood: 1**

	Due to the mitigation measures we have in place and the inherent nature of our platform (not a social media platform), the probability of risks associated with our recommender system low. – **Minor Likelihood (1)**
Overall assessment/ Salience Score	**Medium - 12**

11.2.4 Identification of additional measures

Aylo considers its current suite of mitigation measures to be robust and proportionate. At the same time, Aylo continuously monitors the evolving risk landscape and proactively evaluates the need for additional safeguards.