

Exhibit 131

[AC/Priv] Underage Reporting and Enforcement - XI/CSI

A/C PRIV - REFLECTS ADVICE OF COUNSEL, ATTORNEY-CLIENT COMMUNICATIONS, AND IS WORK PRODUCT DONE AT THE DIRECTION OF COUNSEL

Jointly drafted by Central Social Impact Age Assurance and XI Actor

Updated Operating Model (10/2)

TL;DR The CSI team has been building context and expertise around Human Review flows and is on a good path to self sufficiency, including currently running an audit of the flows. We are going to adjust our RACI and associated investment approach and move allocated XI Eng capacity (1 IC6 PID) to XI:Authenticity to support S.1 (Enforcement).

- CSI will formally take accountability/responsibility for human review (measurement, workflows, capacity management). This reflects how the team is already operating today and will minimise dependencies between Orgs.
- XI:Authenticity will continue to be responsible for the appeal and verification experience.

These changes are reflected in the RACI below.

ALIGNED: Operating Model Clarity: Underage Enforcement: 3/6, 145pm PT

Attendees: [REDACTED], [REDACTED], Miki Rothschild

TLDR: XI own enforcement when someone is reported, CSI will own proactive detection, ensuring consistent experiences and coverage across apps, identification of new appeal methods.

1. XI will own:
 - a. When someone is sent for review, XI ensures the review is high quality, and there is infrastructure to support new methods as needed.
 - i. XI will liaise with Kate Gotimer's team on ops capacity
2. CSI will own:
 - a. Proactive detection strategic approach + building of any requirements to enforce on proactive detection (e.g. heuristics)
 - b. Identification of gaps across apps - ensuring consistent experiences and coverage
 - c. Will identify new methods for verification and will build those methods
 - d. Will triage any SEVs to the appropriate team, as needed

Detailed RACI:

Reviewed and aligned by: [REDACTED] Miki Rothschild [REDACTED] [REDACTED] [REDACTED] [REDACTED]

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Commented [1]: I feel like we are currently doing this? 1 total reaction

[REDACTED] reacted with 🧐 at 2024-09-30 08:43 AM

Commented [2]: +1, we (CSI) have been driving all the measurement and human review flow work 1 total reaction

[REDACTED] reacted with 🧐 at 2024-10-02 01:39 AM

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Deleted: Updated Operating Model (10/21)
UPDATE (09/26/24) [REDACTED] The CSI team has been building context and expertise around Human Review flows and until today has not relied on any support from the XI:Actor team. They are on a way to self sufficiency here. We are going to adjust our RACI and associated investment approach and move allocated Eng capacity (1 IC6 PID) to XI:Authenticity to support S.1.

Subworkstreams	Responsibilities
3. Propagations	
E2E Monitoring	E2E Monitoring with identified FB and IG team with v-team approach
SEV Management	The triage and reconciliation of SEVs as they arise.
Strategy - long term underage enforcement strategy	Proactive and Reactive short and long term underage enforcement strategy, including identifying and mitigating gaps across FOA / WA and RL.

With any decision the following would not shift:

1. Integrity Ops support across the board for both FoA and RL
2. RL Trust and VR Integrity ownership:
 - a. VR Reporting Web Form,
 - b. Twilight Reporting Experience,
 - c. Headset Reporting Experience
 - d. Salsa checkpoint experiences
 - e. UFAC owns enforcement experience
 - f. Authenticity owns ID appeal jobs
3. WA enforcement remains status quo.
4. SPACE (Signal Propagation and Consistent Enforcement aka Family Experiences Propagation) maintains ownership of propagation of signals.
5. Authenticity ownership of UFAC and AVS

1A. XI Misrep Staffing

People Misrep team, owning the Underage E2E reporting and enforcement flow, focuses on [impersonation problems](#), where age plays a relatively minor factor, resulting in an overall lower priority and understaffed on the Underage domain.

The Underage reporting and enforcement pipeline had been put to [Maintenance Mode the past 1.5yr](#), with the team only conducting bug/Sev fixes and monitoring. Since then, the majority of eng and XFN with context have departed.

The current task force contains: <0.25 Eng, <0.25 DE, 0 PM and other XFN

1B. Historical SEVs

Included all SEVs from 2023 related to the discussed domain.

Sev Number	Severity	Created Month	Start -> Mitigate	Affected App	Description / Impact	Critic	If happens under proposed RACI, Which team is the owner?
S395677	Sev 3	February 2024	Unclear on start date Create to mitigate 4d in February	IG	IG automated policy to ignore above age users has 70-75% precision (comparing to 95%+ goal), resulting in ~30% reports incorrectly ignored. Solved short term by turned off this automation policy.	Detected by DS manual audit Goal was not clearly documented until DS manual audit and investigate. No monitoring or alerting were set-up.	CSI