Exhibit 43

various African countries exploring the same; and in Korea where such legislation already exists they are exploring mechanisms for verifying parental consent.

Specific Bills:

- US: FTC to update COPPA rules (expected in 2020)
- UK: Age Appropriate Design Code (likely implemented in H1 2021 subject to Parliamentary approval), Online Harms Bill
- Ireland: Child Safety and Media Regulation
- Australia: eSafety Commissioner's Safety by Design principles, amendments to the Online Safety Act
- Brazil: Internet Steering Committee ("CGI") focused on ads for minors and use of minors data (e.g. Bill 1746/2015)
- Germany: Federal and Interstate Youth Law (likely to come into effect in H2 2020; proposes browser-level age verification for German citizens)
- South Africa: Protection of Personal Information Act 4 of 2013 (July 1, 2021)
- Philippines: Safer Internet Bill (parental consent for U18s)
- India: Personal Data Protection Bill, 2019 (requires age verification and parental consent)
- SSA: Zimbabwe's Cyber crimes bill (parental consent and robust age verification), South Africa Films and classification amendment act 2020 (registration, self classification, age verification for pornographic sites), Kenya Data Protection Act 2019 (age verification for under 18's on social media platforms)
- Indonesia and Philippines: Draft bills w/r/t age-verification to ensure minors not exposed to "inappropriate/immoral content"
- South Korea and Japan: Proposals requiring we verify age through mobile phone numbers
- Colombia/Peru/Paraguay/CENAM: routine bills on mandating blocking content for kids (video games, social media, educational, etc)

Where we think we are most vulnerable and need to step up our efforts.

Immediate Product Vulnerabilities

- We lack a U13 classifier, insufficient means to detect and remove u13s at scale
- We also have deprioritized u13 enforcement because COPPA compliance is at risk when we sit on knowledge of u13, incentivizes not knowing
- Age prediction models are not that accurate, reducing the efficacy of classifiers like the grooming classifier and requiring more reliance on human review
- Age prediction models are not globally operational; as a result, integrity measures that leverage age are inconsistent and unreliable, including child safety protections
- Age prediction models are not globally resilient, they tend to perform better in Western markets and worse in emerging markets
- Age models do not work as well on IG; as a result, we have no ability to more granularly gate minors out from age-related experiences on Instagram.
- As a result of all of the above, are age-gating doesn't work as well as it should yet we offer age-gated products like Watch Together, FB Dating,... and we have minors who appear as young as 12 years old.
- Lack of u18 checkpoint: Risk having u18 users on 18+ products like FB Dating, Marketplace, Mentorship, or as under-age parents on Messenger Kids
- Age verification: We remain reactive on age verification, pushing for a device side solution, when we're getting increasing policymaker pressure to be proactive while our competitors improve their approaches

Areas of Improvement

The development of a device-side system for age verification to block U13s from our services will go a long way to addressing the concerns of child safety stakeholders, but we should fast track that effort. We also should improve our age identifying classifiers and expand "age appropriate" protections and experiences. Below are specific suggestions:

- **U13 enforcement:**
  - Prioritize cross-enforcement of u13s on IG who have hard-linked FB accounts.
  - Clear current u13 backlog (~700K job backlog) which is currently not resourced.
- **U18 enforcement:**
  - Create an u18 checkpoint to effectively manage gating u18s from 18+ products
- **Age verification:**
  - Use age prediction in combination with age verification checkpoints to gate based on age-gated product or content.
- **Age Model improvements:**
  - Expand best available age models to more markets
  - Improve age model accuracy in emerging markets
  - Improve age models on IG, we currently only have stated age for ~67% of IG users and age models don't work as well, need IG leadership to consider collecting age for the remaining users for whom we have no stated age.
- **Age Audit:**
  - Review our default settings and gating for minors, pressure test them identify improvements (e.g. GYSJ and PYMK restrictions), and implement them
- **Safety by Design:**
  - Develop a "safety by design" process or product safety review similar to privacy review
- **Education:**
  - In product U18 specific user education on safety and privacy tools (e.g., unique user education at sign up)
- **Age appropriate experiences:**
  - Develop 13-16 yo, 16-18 yo and 18+ experiences

Extent to which there is work ongoing to address the 'areas for improvement' and opportunities flagged.

Internal Readiness/State of Play

Overall we are quite vulnerable when it comes to age management on our apps. To some degree that is because leadership has decided to live with certain risks at least in the near term. For example in March, we decided we would not build a classifier to detect minors under 13 years old. Identity Integrity identified a PM who will own age verification but we will only prioritize this work when we face clear legal obligations to do so. Instead, we will push industry partners for device/OS level age verification and management solutions as they are best placed to do this well. At the same time, leadership did not rule out improving our age classifiers and we are building age specific experiences, but that work is not advancing with the same speed as external pressures on this subject.

	A	B	C	D	E	F
1	**Area**	**Additional notes**				
2	**Ready; work is complete / ongoing and on track**					
3	Preventing unconnected adults from initiating messages with FB minors	Using a combination of stated age, age prediction models, and hard-matched or high-confidence soft matching, product work is ongoing and on track to prevent unconnected IG adults from initiating messaging with FB minors in cross-app communications.				

4	Parental Controls	Work is ongoing to bring parental controls to Oculus -- the only gaming platform that doesn't have parental controls. Unification across the company and account linking puts Oculus on notice of users' ages. But as a platform that will largely pull from FB data to predict age, backend protections for minors on Oculus will also rely upon improving our age models.
5	**Somewhat ready; work is ongoing but more resources are needed**	
6	IG Age Affinity Models	Core Dimensions is building out age affinity models to drive the appropriate usage of age on IG through better onboarding, usability and enforcement. However, age models do not work as well on IG because IG only started to collect age data for new sign ups in December 2019. Thus, we currently only have age for ~65% of IG global Monthly Active Users using stated age (using either an IG stated or FB hard match). Age collection on IG has previously been criticized as being for the purpose of targeting ads, and intrusive to users who do not necessarily need to bring their authenticated selves to the platform. Relying on stated age on similar apps in the industry also have also resulted in age lying and misrepresentations, and fines for collecting children's personal information. While IG leadership has been periodically engaged with Core Dimensions, we'd recommend accelerating progress on these improvements and have strong leadership backing to prioritise age model maturity on IG.
7	U13 enforcement	Ongoing: Recently, Identity Integrity did agree to enable cross-enforcement of u13s on IG who have hard-linked FB accounts since basic COPPA compliance is at risk when product does not prioritize checkpointing and disabling u13s. There is a chance, however, that this fails to get resourced because of engineering constraints on that team. However, there's also a current u13 backlog (~450K job backlog) that must be addressed via workload allocation and automation (i.e. auto-accept all other age change requests, which is a combo of people going from 13-18 > 18 and people going from >18 to 13-18). This backlog is currently not resourced and has been escalated to Ops Resources. In the current state, we would not be able to reduce the backlog to zero for another year. The cross-enforcement of u13s may also be at risk if the 2020 elections need more investment.
8	Global use of age models	The best performing age model is not yet globally operational, which leads to a patchwork of integrity measures across the company that leverage age, including our Child Safety models that provide protections for minors on our platform. We need more (a) review resources to establish ground truth data on age in priority markets, which takes headcount and capital, as well as (b) more engineering resources to invest in model improvements where accuracy is poor (e.g., India). We could start by engaging with Core Dimensions (the product team who owns the age models) on what markets we've identified and stack ranked as a Policy org to prioritize with their available H2 resources.
9	Accounts You May Follow (Instagram)	Unlike Facebook's People You May Know model, which prevents unconnected adults from discovering or initiating conversations with minors, Instagram has no similar logic for Accounts You May Follow, largely in part because we historically did not have age-related data for IG accounts. We're in the process of deep-diving into true positive prevalence labels to determine the most common surfaces where violators find their victims, so we can measure the impact of our efforts to reduce minor discoverability on selected surfaces (e.g. search, suggested accounts).
10	**Not ready; work has not been prioritised and more resources are needed**	
11	Age data on IG	Age models do not work as well on IG because IG only started to collect age data in December 2019. In addition, Adam Mosseri will not support upselling age collection for existing users because he sees it as intrusive data collection. Thus, we currently only have stated age for ~67% of IG users. We recommend engaging with IG leadership on collecting age for the remaning ~33% and prioritizing age model maturity on IG.
12	Addressing virality on Instagram	Minors who go viral on Instagram will likely experience increased interactions with unknown people. As their content and by extension their account becomes surfaced to more unconnected people, they would benefit from additional protections that they can turn on, like limiting who can send them private DMs or follow requests. However, with a lack of age data, we cannot effectively develop solutions at scale that address virality of minors on Instagram without also generating a large number of false positives / false negatives.
13	Inability to automate groomer disables	Our biggest enforcement gap in relation to age for child safety is currently our inability to automate decisions accurately to enforce against groomers. The Adult Classifier – while it is our best available age model to determine whether someone is a teen or non-teen -- cannot determine age gaps at a granular level which hampers our ability to action our policies, which rely on making specific age determinations, i.e. if the victim is 14 years old or younger and the offender is 18, disable and escalate but if the victim is 15 and the offender is 18, checkpoint the offender. However, single-year granularity is really difficult to achieve with machine learning models. Thus, we'd also need additional human reviewer investment to get better at this.
14	U18 checkpoint	We do not yet have product support or resources for an u18 checkpoint where we can efficiently manage u18 users who are reported or detected on 18+ products like FB Dating, Marketplace, Mentorship, or as under-age parents on Messenger Kids. Identity Integrity, which owns underage checkpoints, has no plans to invest in age management in H2 and will instead prioritize impersonation work. Central Privacy has decided to stand up a small team on youth privacy but they have not yet hired a PM and have offered to prioritize a few low business cost/high policy impact projects for H2. If Identity Integrity cannot prioritize age because of U.S. GE 2020, our best opportunity might be with Central Privacy's willingness to help and we could push for immediate hire of a PM to make some progress on this work in H2.
15	Age verification pressures	We will likely continue to face external pressure to verify age. YouTube announced this week that they will ask European users to provide proof that they're above 18 if they seek to access age-restricted videos. The goal is to help YouTube comply with the EU's audiovisual media services directive, which requires platforms to protect minors against harmful material. We could take a similar approach where we use age prediction to put people into additional age verification checkpoints based on whether a piece of content or product feature is age-gated. We could also treat all users as u18 for any of these age-gated features or content until our age models generate a prediction that they're over 18. The challenge is getting our age models globally operational and justifying such an approach to product growth teams.

How we might kick start conversations on this work.

Recommendation

Our overarching recommendation is the same as mentioned above, create an independent child safety vertical, and include this issue as a priority within that vertical to ensure it the proper focus and resources . Again, if that is too big a lift, to deal with the most immediate vulnerabilities w/r/t to age assurance, management and appropriate design policy leadership could:

1. provide HC for a child safety policy SME who focuses solely on driving a child safety strategy
2. sign off to conduct an expert audit of our default settings and protections for minors, identify improvements (e.g. GYSJ and PYMK restrictions), and implement them.
3. ensure product and CO have the resources need to act on knowledge we already have, i.e. clear our backlogs, disable verified u13s, build an u18 checkpoint to review minors who have been reported on 18+ products like FB Dating, etc..
4. establish as basic company principle that if we're using predicted age for business purposes, we should do the same for enforcing on age/safety
5. support improving our age classifiers and operationalizing them based on a stack ranking of our most sensitive policy markets
6. prioritize rapid improvement of IG age models given younger demographic
7. urge Central Privacy to fast track hiring of a youth privacy PM and to prioritize a few low business cost/high policy impact projects for H2

SSI

Policy Landscape

While SSI experts support our existing policies and our commitment to ongoing review of our policies, the need to explain the ever increasing rate of death by suicide and concerns about the impact of social media on youth well-being more broadly keep us under heightened scrutiny in this area – most notably in the UK. Specifically, this translates into concern among some policymakers and stakeholders that almost any exposure to this content for minors "normalizes" it and puts them at risk, and these concerns which help fuel online harms legislation to ensure we behave responsibly. At the same time, some policymakers, most notably the IDPC, and health policy experts are raising privacy related questions w/r/t our work in this area, creating a tension between those who push for increased scanning and those who want us to take a more privacy sensitive approach. This tension begs for a forward leaning approach involving both sets of stakeholder to come to agreed upon norms.

Legislative/Regulatory Action

- UK: Coroner's report from inquest into the death by suicide of British teenager Molly Russell due (pre-inquest review hearing September 25); Online Harms Act;-UK Samaritans guidance for industry released 9/10 recommending a single PoC, clearer policies to prohibit "normalizing" SSI and no encryption* to ensure can scan for this content in messaging
- Ireland/IDPC/EU: IDPC has continuing privacy concerns around processing of mental health data when running our SSI classifiers, as a result we are taking a far more limited approach in the EU which means we are susceptible