

## **I. Introduction**

Meta Platforms, Inc. (formerly Facebook, Inc.) thanks the Office of the High Commissioner for Human Rights (OHCHR) for the opportunity to address the practical application of the UN Guiding Principles on Business and Human Rights (UNGPs) to the activities of technology companies.

Meta's mission is to give people the power to build community and bring the world closer together. Our mission is inherently, closely associated with the values and rights framed in the Universal Declaration of Human Rights. Since 2013, Meta has been a member of the multistakeholder [Global Network Initiative](#) (GNI), and has committed to implement the GNI Principles and Implementation Guidelines. Meta joined the UN Global Compact in September 2021, confirming support for the Compact's Ten Principles, including on human rights. Our [Corporate Human Rights Policy](#), adopted in March 2021, serves as the foundation of our human rights commitments. Grounded in the UNGPs, our obligations as a member of GNI, and key international human rights principles, the Policy guides our work to respect human rights across the Company. The core elements of our policy are to (1) apply human rights policies across the company, (2) conduct human rights due diligence and disclosure, (3) provide access to remedy, (4) maintain oversight, governance, and accountability, and (5) protect human rights defenders.

Meta also continues to participate in OHCHR's B Tech Project working with the OHCHR and other technology companies to develop authoritative guidance and resources for implementing the UNGPs in the technology space.

We know that we will be judged based on our actions, not our words. We have sought to build transparency into every pillar of our program to help ensure that

rightsholders, human rights defenders, journalists, researchers, and users globally can safely benefit from our products. As part of this commitment to transparency, we (1) share policies in our [Transparency Center](#), (2) publish due diligence ([here](#), [here](#), [here](#)), and going forward, will provide an Annual Human Rights Disclosure Report, (3) publicize diverse grievance pathways, and the [decisions of the Oversight Board](#), (4) publicly describe our approach to governance over our salient risks related to maintaining a safe online environment in countries at risk. Under our fifth pillar, we have announced a [Human Rights Defender Fund and Journalist Safety Initiative for Asia Pacific](#). We are grateful for this additional opportunity for transparency, sharing with the OHCHR our activities ahead of the March 7-8 [consultation](#) and subsequent thematic report to the Human Rights Council.

## **II. Addressing human rights risks in business models**

Meta has embedded its commitment to respect human rights from “the top of the business enterprise through all its functions.” UNGP 16 Cmt. To fully embed human rights risks into Meta’s business model, Meta’s [Corporate Human Rights Policy](#) applies to all Meta entities. The underlying principles of equality, safety, privacy, and expression inform all of Meta’s core policies, including our corporate [Code of Conduct](#), Facebook’s [Community Standards](#) for users, Instagram’s [Community Guidelines](#), [WhatsApp](#) policies, our [Responsible Supply Chain](#) program, our [Privacy Principles](#), our [Law Enforcement Guidelines](#), our [Data Policy](#), and our [Diversity and Inclusion](#) practices, among others. Meta’s Board of Directors’ Audit and Risk Committee’s charter provides for the committee’s oversight of human rights risks.

As a GNI member, Meta commits to respect freedom of expression and privacy, aligned with the standards contained in the International Covenant on Civil and Political Rights (ICCPR). Our GNI commitments give us a framework for making responsible decisions when we face government restrictions on freedom of expression and privacy rights. GNI also serves as an important forum for learning, bringing together industry, investors, civil society, and academics. We are regularly and independently assessed on our implementation of our GNI commitments; for more details, see the latest GNI Public Assessment Report.

We have watched the use of our technology to illuminate underrepresented voices and important issues. Yet, we know, that this technology can also be gravely misused by third parties, to heighten existing social tensions and suppress people's fundamental rights.

For example, coordinated inauthentic behavior (coordinated efforts to manipulate public debate for a strategic goal where fake accounts are central to the operation) on Meta's platforms could lead to salient human rights risks including the coordinated posting of content that attacks people on the basis of their opinion, beliefs, or protected characteristics, content that is connected to harm, content that depicts violence, content to that is intended to bully, harass users, or encourage self-injury, misinformation or disinformation that is intended to bully or harass users, or content that exacerbates conflict, corruption, and instability in conflict affected and high risk areas. These risks could impact human rights such as the rights to expression, opinion, life, liberty, and the security of person, equality and non-discrimination, and mental integrity and protection against psychological harm. Meta performs ongoing diligence to review, assess, and remove, deceptive campaigns around the world. When we find domestic, nongovernment campaigns that include groups of accounts

and Pages seeking to mislead people about who they are and what they are doing while relying on fake accounts, we remove both the inauthentic and authentic accounts, Pages, and Groups directly involved in this activity. This work requires continuous monitoring and enforcement. Using both automated and manual detection, Meta is continuously removing accounts and Pages connected to networks that we took down in the past.

Informed by the UNGPs, and our GNI commitments, this work does not happen in a vacuum; it must be informed by stakeholders and performed with transparency. Since 2018, we've reported on over 150 influence operations, along with details on each network takedown so that people know about the threats we see—whether they come from nation states, commercial firms or unattributed groups. Information sharing has enabled our teams, and investigative journalists, government officials and industry peers to better understand and expose internet-wide security risks, including ahead of critical elections. In 2021 alone, [we removed 52 networks](#) that originated in over 30 countries, and reported publicly on all of them. In December 2021, we began expanding [our beta research platform](#)—with about 100 data sets—to more researchers worldwide studying influence operations. With this platform, we now provide access to raw data where researchers can visualize and assess harmful operations both quantitatively and qualitatively, in addition to sharing our own internal research and analysis.

These are just some of the efforts that Meta has taken to include human rights considerations in our operations. We're committed to understanding the role our platforms play offline and how Facebook's products and policies can evolve to create better outcomes. In recent months, we have also conducted a months-long investigation, and took action against seven different surveillance-for-hire entities, and shut down the Face Recognition

system on Facebook as part of a company-wide move to limit the use of facial recognition in our products. We will continue to strive to keep people safe and their information secure.

### **III. Human rights due diligence and end-use**

Meta's Corporate Human Rights Policy and our GNI commitments emphasize the importance of human rights due diligence and disclosure. Human rights due diligence includes several components: assessing potential negative impacts, instituting mitigating measures, evaluating the effectiveness of those measures, and reporting on those three steps. We identify and prioritize the most salient human rights issues according to UNGP criteria, which include factors such as scope, scale, remediability, and likelihood. We seek to identify vulnerable or marginalized groups and engage, meaningfully, to hear concerns and create solutions. As part of our "show, not tell" ethos, we have made a substantial commitment to transparency in our diligence exercises, something that remains rare in our industry.

We use a range of due diligence methodologies countenanced by the OHCHR, including human rights impact assessments (HRIA). A HRIA is a detailed form of human rights due diligence that allows Meta to identify its human rights risks and impacts, while strengthening positive impacts and mitigating negative risks. This work is in line with our commitments as members of the GNI, and our responsibility under UNGP Art. 18. Our formal due diligence work has focused on countries, vulnerable groups, specific issues, program components, products and product changes. Meta identifies where due diligence exercises should be conducted according to risk levels. The diligence exercises focus on engagement with stakeholders, including rightsholders. When the diligence exercises are completed, Meta creates an action plan that identifies owners based on implementation for those recommendations that are accepted, and monitors follow-up on the recommendations.

Meta has also conducted due diligence exercises beyond HRIAs. HRIAs reflect risks and impacts at a snapshot in time; yet, they can take many months, and sometimes years, to complete. They are an important tool for transparency and involving rightsholders in the global human rights community. At the same time, Meta seeks to leverage technology to create effective, rapid and even real-time assessments and risk indicators. We have generated a variety of due diligence offerings, including content escalation protocols, ongoing on-demand support and counseling for product teams to provide real-time feedback, and developing prioritization frameworks. Examples of our varied diligence work includes:

- We published [An Update on Facebook’s Human Rights Work in Asia and Around the World](#), and published three independent human rights impact assessments we commissioned in 2018:
  - [Indonesia Human Rights Impact Assessment](#) and [Facebook’s Response to Indonesia HRIA](#)
  - [Sri Lanka Human Rights Impact Assessment](#) and [Facebook’s Response to Sri Lanka HRIA](#)
  - [Cambodia Human Rights Impact Assessment](#) and [Facebook’s Response to Cambodia HRIA](#)
- We published [An Independent Assessment of Meta’s Human Rights Impact in the Philippines](#) and published the [Article One Philippines HRIA Executive Summary](#) and the [Meta Response Philippines Human Rights Impact Assessment](#).
- We developed a [prioritization framework](#) to address how to govern a safe online environment in countries at risk. The Program is a critical step in risk-tiering the company’s efforts to combat offline and coordinated harms.
- We conducted rapid diligence in Ethiopia and responded with product and policy changes to match the human rights risks identified. We published this information: [An Update on Our Longstanding Work to Protect People in Ethiopia | Meta \(fb.com\)](#)

### **(3) Accountability and remedy**

Access to remedy is a central tenet of Meta’s Corporate [Human Rights Policy](#). In designing our grievance pathways, we have sought to be transparent and diversified. Meta maintains multiple grievance pathways, which are identified in the Code of Conduct, [on the](#)

[website](#), and on platforms and apps. Reporting pathways include phone numbers, webpages, and through mechanisms on platforms and apps. Anonymous reporting is available through the [Whistleblower and Complaint Policy](#).

When concerns about content are raised, review is performed by trained personnel. Tens of thousands of content moderators perform work for the company. Content is assessed against [Community Standards](#), and there are expert teams that evaluate particularly challenging or high-profile content. Content moderators receive at least 80 hours of live training and hands-on learning, are based around the world, and have language skills and cultural competency backgrounds that allow them to evaluate content within the context in which it originates. Likewise, our fact-checking program has expanded to include more than 80 organizations working in more than 60 languages globally. The focus of the program is to address viral misinformation – provably false claims, particularly those that have the potential to mislead or harm. Fact-checkers are independent of the company and certified through International Fact-Checking Network.

The company employs a variety of transparent remediation approaches, as addressed in the [Community Standards Enforcement Report](#). These include removing and restoring content, restricting or disabling accounts, blocking tools, friction for sharing problematic content and other steps through a [remove, reduce and inform](#) approach. There is also a content rating approach with labels to evaluate and distinguish content. In addition, decisions regarding discipline, and the means through which accounts and profiles can be removed—including under a “strike” system. In all, the pathways and processes for considering and remediating grievances (and the policies against which grievances are

assessed) are designed to be consistent with the effectiveness criteria for operational grievance mechanisms as outlined in UNGP 31.

There also is a robust content appeals process, including to an independent [Oversight Board](#) (“OB”) that issues advisory opinions as well as decisions that have to be implemented by the company. The OB’s appeals processes are clear and transparent, and the OB itself was mapped against UNGP 31 before it was launched. When the OB decisions are issued, their perspectives are integrated into company processes for evaluation and action. The grievance pathways have been informed by stakeholder engagement, and continue to improve based on learnings.

Transparency remains the bellwether for the health of our program, with routine publication of policies with human rights implications, information related to how content determinations can be appealed, and decisions of, and responses to, the OB. When content is removed, we notify users and clearly identify pathways for content removal decisions to be appealed. Data regarding removal decisions and other aspects of policy enforcement is published through the Transparency Center, and numerous risks are disclosed to relevant stakeholders.

#### **IV. Conclusion**

From rapid crisis response to major human rights impact assessments, we aim to act with transparency, respect, and humility. Meta learns from every human rights due diligence exercise we undertake, and these insights are critical to changing how we operate to better support communities around the world. We have a long road ahead, but sharing some of the progress we have made is part of our commitment to demonstrating action and accountability. The projects discussed here represent the beginning of our work, not the end.

AC PRIV

We appreciate the opportunity to share our experiences and look forward to hearing further insights from the OHCHR and other stakeholders on these critical topics.