

Malt Transparency Report - 2025

Introduction

At Malt, we are aware of our responsibility to promote a safe and respectful online environment.

In accordance with the requirements of Regulation (EU) 2022/2065 (the EU Digital Services Act or DSA), Malt provides the following report on content moderation activities engaged during the period of **January 1 - December 31, 2025**.

Our goal is to make this report more comprehensive and well-documented each year.

Summary

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1. Government Orders from Member States

DSA Article 15(1)(a):

- **The number of orders received from Member States' authorities to act against illegal content provided by recipients of the service, categorized by the type of illegal content concerned and the Member State issuing the order.**

During the relevant period, Malt received zero orders from EU Member States' authorities to act against illegal content provided by recipients of the service.

- **The number of orders received from Member States' authorities to provide specific information about one or more individual recipients of the service in the context of illegal content-related incidents, categorized by the type of illegal content concerned and the Member State issuing the order.**

During the relevant period, Malt received zero orders from EU Member States' authorities requesting specific information about individual recipients of the service.

- **The time needed to inform the authority issuing the order, or any other authority specified in the order, of its receipt, and to give effect to the order.**

Not applicable

2. Content flagged by Users & Trusted Flaggers

DSA Article 15(1)(b):

- **The number of notices submitted in accordance with Article 16, categorised by the type of alleged illegal content concerned.**

| Type of alleged illegal content | Numbers | Measures taken |
|---------------------------------------|---------|---------------------------------------|
| Inappropriate behavior | 1 | Client's account suspended |
| Unfair bad review following a project | 1 | Mediation procedure between the users |

- **The number of notices submitted by trusted flaggers.**

During the relevant period, Malt received zero notices submitted by a trusted flagger.

- **Any action taken pursuant to the notices by differentiating whether the action was taken on the basis of the law or the terms and conditions of the provider.**

Following notices received at the dedicated address, the Customer Experience team analyzed the situation and took one of the following actions:

- Suspension: Suspended the user who violated the Terms and conditions that require respectful communication between users.
- Mediation: Offered to facilitate communication between the parties to understand the reasons behind the client's unsatisfactory feedback following the project.

This demonstrates Malt's commitment to maintaining a professional and respectful environment on the platform.

- **The number of notices processed by using automated means.**

To date, no notice received at the dedicated address is handled by using automated means. Each notice is analyzed on a case-by-case basis by the Customer Experience team, and no action is taken without the user concerned being notified of the sanctions that may be potentially applied depending on the situation.

In general after having received a request addressed to the Customer Experience team, the median time needed for taking the action is 4 hours.

3. Malt's own-Initiative Content Moderation

DSA Article 15(1)(c):

- **Meaningful and comprehensible information about the content moderation engaged in at the provider's own initiative, including the use of automated tools, and the measures taken to provide training and assistance to persons in charge of content moderation.**

This section describes activities Malt undertakes to detect and address illegal content or information in violation of Malt's terms and conditions.

Automated content detection

Malt employs a multi-layered moderation system to ensure a safe and professional environment for all users, ie. both freelancers and clients.

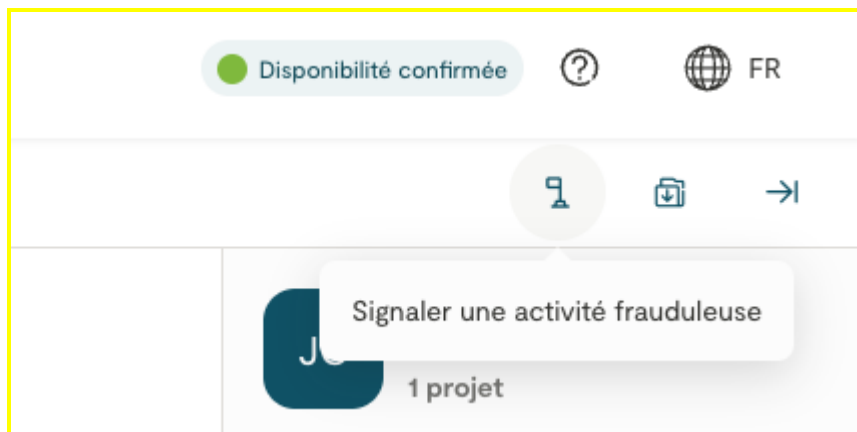
This includes a rule engine system that scans for blacklisted words and other criteria to identify potentially unsuitable or non-compliant content. Additionally, Malt uses automated systems to monitor user activity and flag potentially problematic behavior, such as exceeding contact limits or using inappropriate language; and for project proposals, particularly those submitted by new clients via the AI Search, Malt ensures proposals meet quality standards and adhere to guidelines.

Where applicable, a human-led review is performed within forty-eight (48) hours; and in addition, users can report inappropriate behavior or missions at transparency@malt.com or support@malt.com, triggering a review internally by an analyst.

These moderation methods allow for swift action to maintain platform integrity. This comprehensive approach to moderation helps to uphold Malt's commitment to quality and professionalism, fostering a trustworthy platform for all users.

Reports from Freelancers

Freelancers on Malt have the ability to report a project or any inappropriate behavior directly from the conversation with the client within Malt's integrated messaging system. To do this, they can use the "report" button which generates a report on Malt's internal system. This action sends a notification to Malt's team, who will then review the reported content or behavior. The appropriate action is taken, which may include removing the project, issuing a warning to the client, or other measures to ensure the safety and professionalism of the Malt platform.



Internal policies

We have formalized internal policies outlining the circumstances under which Malt may take moderation measures on a user profile, as well as the procedure to follow in the event of a challenge to such a measure.

In February 2023, we published a dedicated "*Transparency at Malt*" page to provide detailed information about our referencing and moderation procedures ([link](#)).

In addition, we have created a dedicated email address (transparency@malt.com) to allow our users to ask any questions they may have and report any content.

Training and assistance

The Customer Experience team and Operation team, in charge of the moderation, have been trained by the Legal team on this new European regulation, Malt's obligations, and the procedures to follow when receiving and processing reports from our users, trusted flaggers, and authorities.

- **The number and type of measures taken that affect the availability, visibility, and accessibility of information provided by the recipients of the service, categorized by the type of illegal content or violation of the terms and conditions, by detection method and by the type of restriction applied.**

| Types of violation | Freelancers | Clients |
|--|-------------|---------|
| Suspensions imposed for no respect of T&Cs | 16 | 1299 |
| Suspensions imposed for bypass | 3 | 141 |
| Suspensions imposed for | 10 | 344 |

| | | |
|---------------------------------------|----|-----|
| inappropriate behavior | | |
| Account suspensions for scams | 3 | 525 |
| Inappropriate posts reported by users | 46 | 947 |

**Post means project description and messages exchanges on Malt internal messagerie.*

4. Appeals

- Number of complaints received through the internal complaint handling system provided for recipients of the service to lodge complaints against decisions whether or not to remove or disable access to information provided by a recipient of the service, restrict visibility of information provided by a recipient of the service, suspend or terminate the provision of the service, in whole or in part, suspend or terminate a recipient's account, or restrict a recipient's ability to monetize information provided.**

During the relevant period, Malt received zero appeals of the types of decisions described above.

5. Automated content moderation

Malt has implemented automated moderation rules, via an in-house rule engine system that analyzes every project description, and the owner of the project.

These rules are triggered when a project description contains an inappropriate word from a regularly updated blacklist, in case of spamming freelancers, or when bypassing is suspected. This automated moderation generates an alert for the teams to review.

Once flagged, Malt's team will investigate the situation and take appropriate action, which may include lifting the moderation, suspending the account, providing a warning, or offering guidance on platform best practices.

This a priori moderation helps maintain the quality of projects offered on the platform, protects freelancers from potentially unsuitable or unprofessional projects and maintains a safe and respectful environment for both freelancers and clients.

6. Information on monthly active users

Less than 45 millions - last update published in the Terms and Conditions online in March 2026.