REDBUBBLE LIMITED

Australian Code of Practice on Disinformation and Misinformation

Initial Report

21 May 2021

Executive summary

Redbubble is an artist marketplace dedicated to giving independent artists a meaningful way to sell their creations. Redbubble recognises the harm that misinformation/disinformation can cause to the general public.

The Redbubble Community and Content Guidelines prohibit participants in the marketplace from uploading this type of content and our dedicated Controversial Content team actively monitors for designs that violate our standards. Redbubble has signed up to the obligations under the Disinformation Code as part of its commitment to stopping the spread of misinformation and disinformation. This report details the measures that Redbubble takes in this area.

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Background

Business and Content Context

Founded in 2006, the Redbubble Limited (ASX:RBL) owns and operates the leading global online marketplace, Redbubble.com, powered by independent artists. The Redbubble marketplace is driven by the user-generated content of contributing artists. The Redbubble community of passionate artists sell their designs on high-quality, everyday products such as apparel, stationery, housewares, bags, wall art and facemasks. Through the Redbubble marketplace, these independent artists are able to profit from their creativity and reach a new universe of adoring fans. For customers of the marketplace, it is the ultimate in self-expression. A simple but meaningful way to show the world who they are and what they care about.

Approach to Disinformation and Misinformation

Whilst artistic freedom and inclusivity is a cornerstone of Redbubble's mission, Redbubble recognises the harm that arises from the spread of Misinformation and Disinformation.   Redbubble strives to balance its fostering of artistic freedom with the need to prevent the spread of Misinformation and Disinformation. Under the Redbubble Community and Content Guidelines published in the Redbubble website, Redbubble prohibits its users from uploading Misinformation or Disinformation within the images that they upload to the Redbubble website.   The Redbubble Content Management Team applies the Community and Content Guidelines in an unbiased and consistent manner.

Approach to monitoring performance:

The Redbubble Controversial Content team makes use of credible and trusted sources in determining the boundaries of Disinformation and Misinformation, including review of independent, non-partisan fact checking sites, including:

- _Medical Misinformation:_ Redbubble consults reports from a range of leading global authorities that are guided by scientific research to advise on everything from 'Plandemic' misinformation to false claims about Hydroxychloroquine. Sources include:
  - US Food & Drug Administration (FDA): https://www.fda.gov
  - Centers for Disease Control & Prevention: (CDC): https://www.cdc.gov
  - World Health Organization (WHO): https://www.who.int

- _Political Misinformation:_ Redbubble consults non-partisan research centers and independent nonprofits run by professional researchers to guide decisions on political messaging that may cause real world harm. Sources include:
  - FactCheck.org
  - Snopes: https://www.snopes.com
  - Sunlight Foundation: https://sunlightfoundation.com

Data about trends:

Redbubble has witnessed an increasing upward trend in the upload of content relation to anti-vaccination in Australia in recent times, evidenced by the following data:
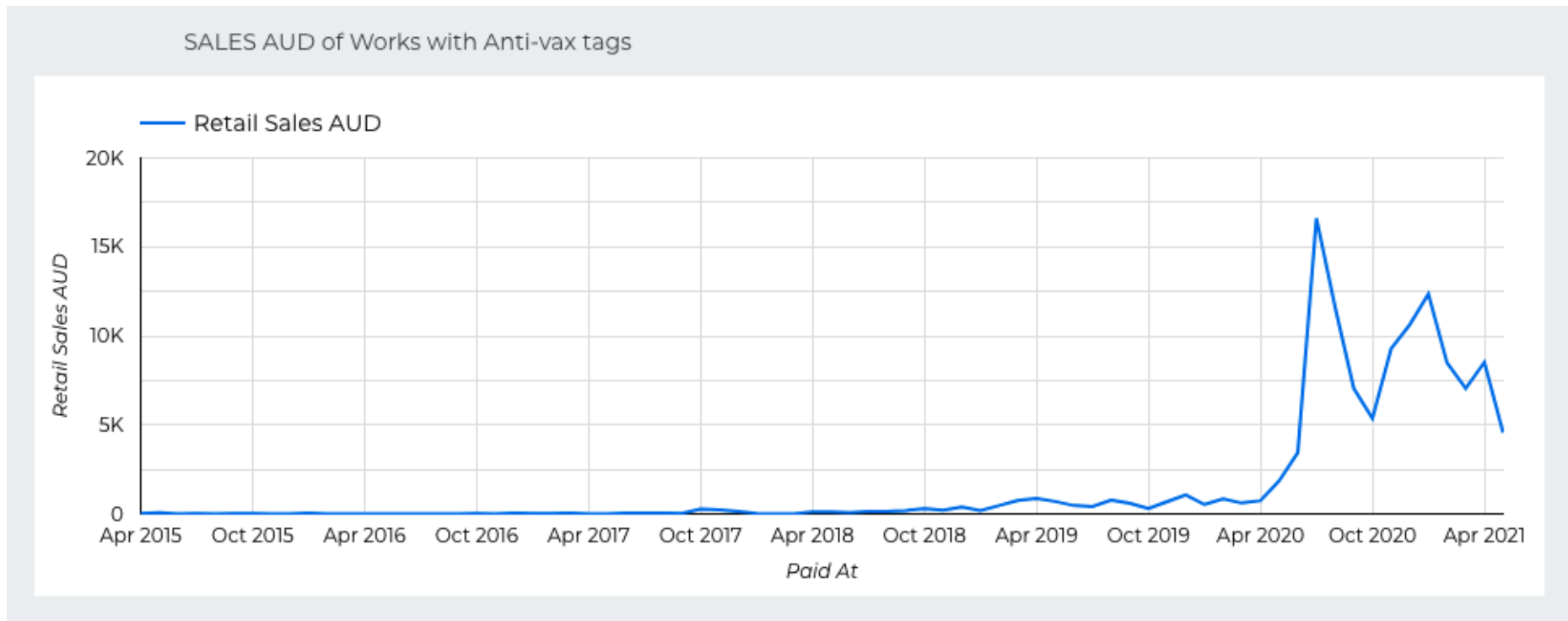
![RB REDBUBBLE]

Whilst an uploader's use of the anti-vaccination related tags does not necessarily mean the content will constitute Misinformation or Disinformation, the vast majority of content removed for breach of the Redbubble Community and Content Guidelines in Australia falls within this category.

Number of works Moderated for Harmful Misinformation agreements over the past two years (Partner Portal) since 2020. Country determined by Residential address

	Country of Uploader	Count of Works Moderated ▼
1.	Australia	81

Harmful Misinformation Tags used in works moderated since 2020

	tag	Number of Times Tag appears ▼
1.	Plandemic	19
2.	Anti vaccine	16
3.	Anti-vaccine	13
4.	Anti-vax	10
5.	Anti vaccination	9
6.	Antivax	6
7.	Anti vax	6
8.	Scamdemic	6
9.	Unmask America	5
10.	Anti-vaccination	5
11.	Anti vaxxer	4
12.	Anti Face Mask	3
13.	new world order	3
14.	Anti-vaxxers	3
15.	Icke	3
16.	David Icke	3
17.	mandatory vaccine	3
18.	forced vaccination	2
19.	adrenochrome	2
20.	Anti Masker	2
21.	covid 1984	2
22.	radio quebec	1
23.	Anti-vaxx	1
24.	no vaccine	1
25.	This Mask Is Useless	1

Future Initiatives

Redbubble's future initiatives in this area include:

- investigating potential improvements in Redbubble's data and analytics capability in relation to content management, with the objective of enabling deeper monitoring of Redbubble's performance in managing Misinformation and Disinformation and tracking trends in this area;
- expansion of the Redbubble Help Center online resources for both artists and buyers, potentially including FAQs in relation to Misinformation and Disinformation: what it is, how to report it and how to avoid spreading it;
- expanding the range of topics included in Redbubble's daily proactive review; and
- continuing to build Redbubble's content detection capabilities.

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Objective 1: Safeguards against Disinformation and Misinformation

Outcome 1a: Signatories contribute to reducing the risk of Harms that may arise from the propagation of Disinformation and Misinformation on digital platforms by adopting a range of scalable measures.

As stated above, Redbubble prohibits the uploading of Misinformation or Disinformation to the Redbubble marketplace platform, by application of the [Community and Content Guidelines](#).

Examples of Misinformation and Disinformation that the Controversial Content team proactively screens for includes:

- *Medical Misinformation:*
  - Anti-vaccine propaganda: Measurably hurts public health by encouraging the spread of communicable disease;
  - Covid-specific Conspiracy Theories: theories that seek to de-legitimise scientifically factual information put forth by trustworthy sources such as the WHO and the CDC - and pose a threat to public health;

- *Denials of real-world catastrophes:*
  - Such as the Holocaust, 9/11 or the Sandy Hook shooting (and perpetrators and symbols of such content) which Redbubble considers causes further distress to victims and can be an incitement to violence

- *Political Misinformation:*
  - Harmful political conspiracy theories/movements linked to real-world harm
  - Platforms that perpetuate the spread of false misinformation: for example 'Parler' and 'Gab'.

As noted above, the Redbubble Controversial Content team makes use of credible and trusted sources in determining the boundaries of Disinformation and Misinformation, including review of independent fact checking sites. The Controversial Content team compiles reference content to create review guidelines and gathers examples of borderline or grey area works.

The Controversial Content team provides Redbubble's Content Operations team with the review guidelines and additional training as appropriate to enable review of historical and incoming works for detection of potential Disinformation and/or Misinformation.

The Redbubble policies and decision-making processes are subject to regular review to ensure their ongoing efficiency and effectiveness.

Developing and executing the Community and Content Guidelines is a cross-functional effort within Redbubble. The internal Redbubble Content Management Policy Team creates and manages the Policy, and Redbubble's Content Operations team executes the Policy. This structure has set Redbubble up to scale, leveraging expertise within Redbubble's operational and legal teams.

POLICY ⟶ CONTENT OPS

Sets and manages marketplace policies, while continuously interpreting them against the backdrop of a constantly changing societal and cultural landscape.
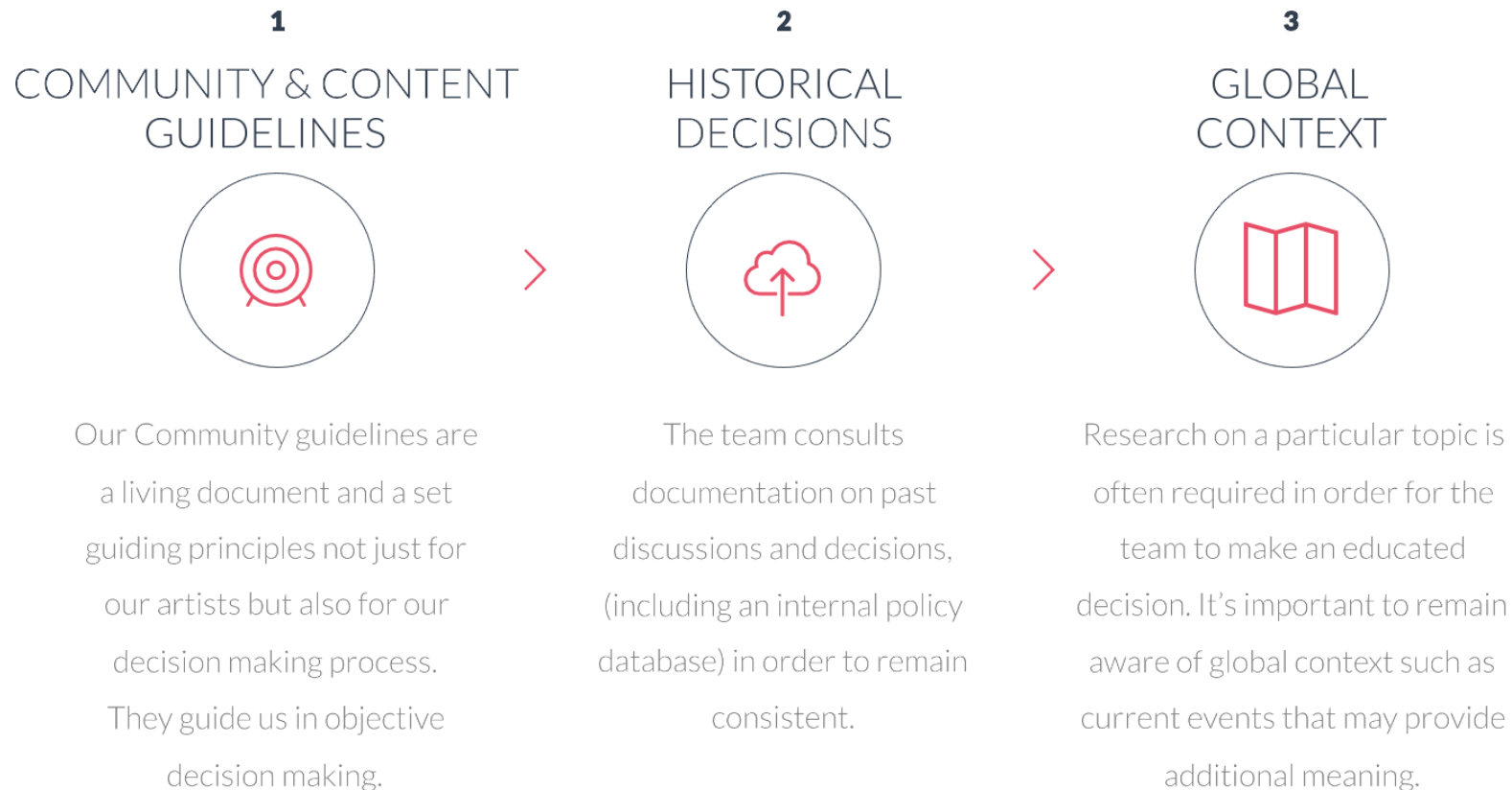
Establishes practices and procedures to manage the execution of content policy on the marketplace, working closely with internal stakeholders.

REDBUBBLE

When the Controversial Content Team makes decisions relating to content that potentially includes Misinformation or Disinformation, the team seeks to weigh the following factors and strike the appropriate balance, both at the individual work level and at the larger topic level. The Controversial Content team's framework for content review is built on a robust repeatable process.

1

COMMUNITY & CONTENT GUIDELINES

Our Community guidelines are a living document and a set guiding principles not just for our artists but also for our decision making process. They guide us in objective decision making.

2

HISTORICAL DECISIONS

The team consults documentation on past discussions and decisions, (including an internal policy database) in order to remain consistent.

3

GLOBAL CONTEXT

Research on a particular topic is often required in order for the team to make an educated decision. It's important to remain aware of global context such as current events that may provide additional meaning.

Outcome 1b: Users will be informed about the types of behaviours and types of content that will be prohibited and/or managed by Signatories under this Code.

The Community and Content Guidelines are published on the Redbubble.com website at **https://help.redbubble.com/hc/en-us/articles/202270929**.

The relevant prohibition under the Community and Content Guidelines defines "Harmful Misinformation" in the following terms:

Harmful misinformation is not permitted. We define this as any misleading or false information that harms or significantly threatens public safety. For example, content that expresses anti-vaccination sentiment is not allowed because it presents misleading and/or factually inaccurate information that negatively impacts public health. Redbubble consults reports from a range of leading global authorities, such as the World Health Organization or the Centers for Disease Control, to aid in this decision-making process.

Redbubble is currently working to generalise the prohibition further to be more inclusive of different types of misinformation and disinformation. In the interim, Redbubble's practice is to remove Misinformation and Disinformation as defined in the Code, upon detection of such content uploaded to the website by users.

Outcome 1c: Users can report content or behaviours to Signatories that violate their policies under section 5.10 through publicly available and accessible reporting tools.

Redbubble's users report can report works they consider fall outside of Redbubble's content guidelines, including works that they consider contain Disinformation and/or Misinformation. A prominent "Report Content" link is provided adjacent to each user-generated image that is published on the Redbubble website:

⚠ Report Content / Copyright infringement

The 'Report Content' link leads the user to the following online form where they can report the relevant content and provide information as to why they consider the content to be or include misinformation or disinformation (or otherwise objectionable):

Inappropriate Content

Note: **Your information will *not* be relayed to the author**, you will remain anonymous.

If you'd like to report ["image name"] by ["artist name"] as inappropriate, please complete this form and we'll make sure the review team takes a look.

Why are you reporting this content as inappropriate?

Please Select...

If the content does not meet these guidelines, please provide any additional comments or information and click "send".

SEND

How does this work?

When you report a concern a notification is sent to the Redbubble objections team. We review the content and follow up in cases where the content falls outside Redbubble's guidelines. Due to the volume of emails the team receives, we cannot respond to every query regarding these reports but please rest assured we do check every single report carefully and we'll be in touch if we need any further information. If you would like more insight into the guidelines we apply, further information is available in our community guidelines. Thanks again!

The introduction in Redbubble's [Community and Content Guidelines](#) encourages users to flag objectionable content in the following terms:

Community and Content Guidelines

Redbubble is a respectful, supportive, and encouraging community that is deeply passionate about art and creativity. We welcome artists of all experience levels and walks of life. Redbubble asks that you do not seek or engage with the content you don't agree with (no need for troublemaking). And if you see behavior or content that goes against our guidelines, please flag it through one of the reporting functions on our site. Above all, we urge you to make the most of your time here by offering support to artists. Contribute positively to the community, and you'll find that Redbubble can be a fun and rewarding place. (Yay.)

The Redbubble Content Management Team also proactively screens the website on a daily basis and removes content that it considers to include disinformation or misinformation related to known topics and issues.   The Controversial Content team determines screening keywords to enable live reviews, and queues existing works that match the search criteria.   Proactive screening measures include 'blacklisting' of problematic terms and phrases that extends beyond the Redbubble website to all marketing platforms that promote products available on the Redbubble marketplace.

Outcome 1d: Users will be able to access general information about Signatories' actions in response to reports made under 5.11.

Redbubble has opted out of Objective 1d at this stage. Redbubble's current policy is that reporting is made on an anonymous basis. We are currently investigating possibilities for providing general information on Mis/Disinformation reports.

Objective 2: Disrupt advertising and monetisation incentives for Disinformation.

Outcome 2: Advertising and/or monetisation incentives for Disinformation are reduced.

No third party advertising is permitted to be published on Redbubble. Redbubble does not sell media space to any third party businesses or organisations. Redbubble is a marketplace designed specifically for the artists who upload their artwork and designs to the website and Redbubble considers that to allow third party advertising or other media placements would compromise its mission and purpose and be detrimental to the relationship between Redbubble and the artist community.

Redbubble reduced monetisation incentives from artist sales of products on the Redbubble marketplace by promptly removing any content that contains Disinformation and/or Misinformation, using the proactive and reactive processes described above.

In addition, Redbubble has introduced "Suspend for Review" functionality to further diminish monetisation incentives. Designs that are identified as potentially Disinformation and/or Misinformation by Redbubble's review systems are automatically suspended and not released for sale until the Redbubble Content reviews the relevant content. This prevents any monetisation in the time period between the time of upload of the design and review by the Controversial Content team.

If a Redbubble user is found to be purposefully breaching the Community and Content Guidelines in the spread of Misinformation and/or Disinformation, then Redbubble will delete that user account (and any linked accounts of the user in breach):

Account deletion for policy violations

If an account is found to be in violation of any of our content or account policies, including the User Agreement, Community & Content Guidelines, and IP/Publicity Rights Policy or is otherwise being used for purposes Redbubble was not designed for, it will be immediately and permanently disabled.

If the account is found to be linked to an existing account, the consequences for policy violations will be applied to all of the artist's accounts.

Examples of policy violations that may warrant account deletion include but are not limited to the following:

- User uploads content that defames or vilifies a person, people, races, religion, or religious group and/or is obscene, pornographic, indecent, harassing, threatening, harmful, invasive of privacy or publicity rights, abusive, inflammatory, or otherwise objectionable

- User has repeatedly reuploaded content that was previously removed for violating our Community & Content guidelines

Redbubble also applies restrictions on products sold by artists over the marketplace in relation to images that are considered borderline problematic:

- Because not all Redbubble content is suitable for the entire range of products offered by artists on the marketplace, the Controversial Content team proactively monitors certain content in order to restrict product availability. The Controversial Content Policy team determines what products are allowed/restricted for topics that may contain product-sensitive imagery.
- Messages about the media, the constitutionality of masks, freedom, censorship, mind control, etc. don't necessarily violate our misinformation guidelines as they aren't exactly providing scientifically incorrect information. However, the availability of these otherwise ambiguous designs on masks adds an additional layer of meaning that isn't appropriate on them due to the serious nature of both the product and the surrounding circumstances of the pandemic. Thus, these designs violate the Mask Content Guidelines and products are restricted accordingly.

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Objective 3: Work to ensure the integrity and security of services and products delivered by digital platforms.

Outcome 3: The risk that Inauthentic User Behaviours undermine the integrity and security of services and products is reduced

Redbubble uses third party fraud detection software called "Sift Science" that combines a global network of data and machine learning to automatically block risky users. Data points used by Sift Science are customised to Redbubble's needs and allow room for adjustments based on emergent trends.

While Sift Science is mainly used as a fraud detection tool, it has been instrumental in maintaining content integrity on Redbubble and blocking risky users who tend to upload trending content that perpetuates Disinformation and/or Misinformation.

Sift Science helps Redbubble catch "content optimizers": i.e. users uploading low quality, mass produced content for the sole purpose of sales. These

users tend to hop on topics that are trending in American media such as the anti-mask movement or 'Stop the Steal'. The software has proactively suspended 320 users in the past 4 months who have had designs moderated for uploading Misinformation

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Objective 4: Empower consumers to make better informed choices of digital content.

Outcome 4: Users are enabled to make more informed choices about the source of news and factual content accessed via digital platforms and are better equipped to identify Misinformation.

Redbubble has opted out of objective 4. The Redbubble marketplace is designed as a platform for independent artists to sell their artwork and designs. There is no part of the Redbubble website that provides a channel for news or factual content.

Objective 5: Improve public awareness of the source of political advertising carried on digital platforms.

Outcome 5: Users are better informed about the source of Political Advertising.

Redbubble has opted-out of Objective 5, because it does not apply to the Redbubble business. No third party advertising is permitted to be published on Redbubble, including advertising from any political party or body. Redbubble does not sell media space to any third party businesses or organisations. Redbubble is a marketplace designed specifically for the artists who upload their artwork and designs to the website and Redbubble considers that to allow third party advertising or other media placements would compromise its mission and purpose and be detrimental to the relationship between Redbubble and the artist community.

Objective 6: Strengthen public understanding of Disinformation and Misinformation through support of strategic research.

Outcome 6: Signatories support the efforts of independent researchers to improve public understanding of Disinformation and Misinformation.

In principle Redbubble is open to supporting independent research that has the purpose of improving public understanding of Disinformation and Misinformation. Redbubble will explore relevant research initiatives before committing resources in this area.

Objective 7: Signatories will publicise the measures they take to combat Disinformation.

Outcome 7: The public can access information about the measures Signatories have taken to combat Disinformation and Misinformation.

This report will be made available on Redbubble's corporate website at shareholders.redbubble.com.

The report will also be accessible on the DIGI website at digi.org.au/disinformation