

April 12, 2024

John Shehan
Senior Vice President, Exploited Children Division
& International Engagement
National Center for Missing & Exploited Children
333 John Carlyle Street
Alexandria, VA 22039

Re: <u>Attestation Report Issued Upon Completion of Concentrix' Audit of NCMEC's Hash List</u>

Dear Mr. Shehan:

I am writing to provide this Attestation Report to memorialize the results of Concentrix' audit of unique images of child sexual abuse material that comprise the Child Sexual Abuse Material Hash List (hashes of CSAM that the National Center for Missing & Exploited Children (NCMEC) created, manages, and shares with technology companies that voluntarily choose to proactively detect, report, and remove CSAM content on their platforms).

BACKGROUND

Concentrix is a customer experience solutions and technology company with 15 years of experience in content moderation, including 10 years of experience moderating CSAM content for Fortune 500 companies. Concentrix has more than 15,000 content and social moderators globally and conducts 2.25 billion content reviews annually.

On April 4, 2023, NCMEC invited Concentrix to participate in a Request for Proposal (RFP) process to conduct an audit of NCMEC's CSAM Hash List. After the completion of a competitive interview and review process, NCMEC notified Concentrix that it had been selected to conduct the audit. On July 13, 2023, NCMEC and Concentrix entered into a contract for Concentrix to conduct an independent audit of 325,885 unique videos and 213,037 unique images, a total of 538,922 unique images and videos, on NCMEC's CSAM Hash List. The parameters of the audit, the first of its kind of any CSAM hash list, required Concentrix, to review each unique image and video on NCMEC's CSAM Hash List and to agree or disagree with NCMEC's assessment that the content meet the federal definition of Child Pornography under 18 U.S.C. § 2256(8).



METHODOLOGY

Concentrix hired and trained 9 content moderators and vetted each moderator to ensure they met the qualifications and skills to perform the audit. The moderators were supervised by a Concentrix operations manager, a Concentrix site director, and a certified wellness coordinator, all with experience reviewing CSAM. All Concentrix staff were required to pass both Concentrix' employee background check, including a sex offender and global sanctions search and NCMEC's fingerprint-based background check and screening before they began work.

Prior to the audit, NCMEC provided Concentrix moderators with training relating to the technology, access/review systems, and audit functions that the moderators would use to conduct the audit at NCMEC's secure facility in Rochester, New York. Once the audit began, there was no intervention or direction from NCMEC. The Concentrix moderators adhered to industry best practices and standards for review of CSAM throughout the audit process.

Concentrix moderators reviewed content for approximately 40-65% of their five-day work week, with wellness breaks inserted at regular intervals to ensure the wellbeing of the moderators and to avoid staleness in their review process. Under Concentrix' protocol, each image and video on NCMEC's CSAM Hash List was subjected to two separate and independent reviews by Concentrix moderators against the federal Child Pornography definition. The Concentrix audit began on October 16, 2023, and concluded on December 8, 2023.

KEY FINDINGS

David J. Slavinsky, Concentrix' primary site director during the audit made the following conclusions upon completion of the Concentrix audit:

- 1. Concentrix moderators completed two independent reviews of each of the 538,922 images and videos on NCMEC's CSAM Hash List.
- 2. Concentrix's audit concluded that 99.99% of the images and videos met the federal definition of Child Pornography under 18 U.S.C. § 2256(8).
- 3. Concentrix moderators identified 59 exceptions during their audit as follows:
 - a. 50 images and/or videos were deemed not to meet the federal definition of Child Pornography.
 - b. 5 images and/or videos were classified as a cartoon/anime depicting sexually exploitative content involving a child, but not meeting the federal definition of Child Pornography.
 - c. 2 videos were damaged and could not be played.
 - d. 2 images and/or videos contained sexual content, but the Concentrix moderators could not distinguish whether a child or an adult was depicted in the imagery.



RESPONSE

Concentrix notified NCMEC of its findings and was notified by NCMEC that in less than 5 business days, NCMEC removed the 59 exceptions identified by Concentrix from NCMEC's CSAM Hash List.

CONCLUSION

This Attestation Report is a true and accurate representation of Concentrix' findings based on its completion of the audit of NCMEC's CSAM Hash List and its review of the audit findings.

Thank you for the opportunity to complete this first-of-its-kind audit of NCMEC's CSAM Hash List and to support this effort to combat online child sexual exploitation.

Sincerely,

David J. Slavinsky Site Director

Concentrix + Webhelp

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