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Chair of the Women and Equalities Committee
Rt Hon Caroline Nokes MP
House of Commons
Palace of Westminster
London
SW1A 0AA

11 April 2024

Subject: Adobe - response to Women and Equalities letter on tackling non-consensual intimate image abuse

Dear Rt Hon Caroline Nokes MP,

I am writing in response to your 28 March 2024 letter regarding the work of StopNCII.org to tackle non-consensual intimate image abuse. **Adobe wholeheartedly shares the Committee's** desire to tackle the misuse of creative technologies and welcomes this opportunity to inform your work on this issue.

We would like to clarify that Adobe does not operate a significant social platform like Facebook, Instagram, TikTok or Reddit that were mentioned in your letter and who have signed up as partners of StopNCII.org. Instead, our business offers a suite of creative and marketing tools used by creatives and businesses around the world. This includes areas where third-party content is present, such as Behance, a professional networking tool, and Adobe Stock, a moderated stock content library.

Since Adobe's founding in 1982, we have been pioneering cutting-edge technologies with positive societal impact. From launching the desktop publishing revolution to leading the field in generative AI, our products have given voice and means of expression to the many, promoting the representation and inclusion of diverse perspectives. Harnessing the power of AI greatly reinforces the potential for these positive outcomes. However, as we have seen, bad actors can misuse this technology to harm others. This is why Adobe is committed to holding itself to a higher standard of not just innovation, but responsible innovation.

Regarding the specific point of third-party content, Adobe dedicates significant resources to preventing the distribution of non-consensual intimate imagery. For example, for our professional stock content library, Adobe Stock, submissions are moderated by an expert team



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and model releases are required for any recognizable person in the content. Across our products, including Behance and Stock, we provide users with multiple methods of reporting possibly problematic content to us. We treat these reports with the utmost seriousness; they are reviewed by the Trust & Safety and other specialized teams and actioned within strict and short timeframes. We also leverage hash matching technologies, such as PhotoDNA, to detect and report any material that exploits children to the [National Center for Missing and Exploited Children \(NCMEC\)](#). To date, we have not received any complaints about Adobe having non-consensual intimate images in any of our products or services.

There is of course, the wider question of the generation of NCII. In the field of content creation, generative AI will usher in a new era. New creative voices will be able to express themselves through easy-to-use tools. As generative AI becomes more powerful and prevalent, it is increasingly important to put safeguards around the creation process and for people to have a way to tell how a piece of content was created.

Our AI Ethics team, the Trust and Safety team, and the product teams are focused on mitigating the risk that our AI-powered solutions could generate NCII. There are feedback mechanisms built into our generative AI tools so that users can easily report if a feature produces a result they perceive as harmful, biased, or inaccurate. We also monitor this feedback data to identify any undesirable outcomes so that our product and engineering teams can address them. This constant feedback loop with our user community is one important way to help ensure our tools minimize harm and uphold our values as a company.

Adobe engages with Ofcom through our trade body techUK, and directly. We support the approach laid out in the Online Safety Act that considers different types of services, functionalities, and levels of risks to avoid a one-size-fits-all regulatory framework. We are reviewing our existing systems and processes and considering any necessary changes under the Act.

We would like to thank you for bringing the work of StopNCII.org to our attention. As we understand it, the focus of their work is stopping the proliferation of this material on social platforms. Nevertheless, we are happy to talk to them to find out whether there are opportunities to support their work as a non-platform provider.

Adobe appreciates the ongoing work of the Women and Equalities Committee to help protect victims of NCII. We remain committed to working with policymakers, regulators, and officials, to



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address the risks of unsafe content. We would be happy to meet and discuss our policies and practices in more detail should you consider this helpful.

Best regards,

Stefanie Valdés-Scott

Stefanie Valdés-Scott

Head of Policy and Government Relations Europe, Middle East and Africa