

Dear Mr. Durov,

We are writing from Human Rights Watch and ARTICLE 19 to inquire about Telegram's operations related to the 2023 Turkish elections. Human Rights Watch is a global, independent non-governmental organization that monitors violations of human rights by state and non-state actors in more than 100 countries around the world, including Turkey. ARTICLE 19 is an independent human rights organization promoting and protecting the right to freedom of expression globally, including in Turkey.

We anticipate releasing our new publication about Turkey's online environment in the run-up to the elections, including efforts by social media platforms and messaging apps, like Telegram, to prepare for the elections.

In the interest of thorough and objective reporting, we want to give you the opportunity to respond to the following questions by **5pm EST on May 4, 2023** so that we can incorporate Telegram's response and perspectives.

1. Does Telegram have any policies in place to address threats to human rights in the context of Turkey's upcoming elections, for example to combat electoral disinformation or harassment of users through its messaging platform? If so, can you please share them?
2. Does Telegram have mechanisms for users to report abuse? And if so, are reporting mechanisms available in Turkish – and other languages spoken widely by minorities in Turkey?
3. Did Telegram conduct a human rights impact assessment ahead of the elections? If so, we would like to request a copy of this assessment or, in the alternative, a summary of its substantive findings.
4. How many Turkish speaking content moderators does Telegram employ or contract to support user safety in Turkey and how does it ensure their political independence?
5. Is Telegram in touch with independent election monitoring groups like Oy ve Otesi (Vote and Beyond)?
6. Telegram does not appear to have a publicly available policy regarding inauthentic or manipulative use of its service. Please confirm whether this is correct. Is Telegram taking any specific steps to address inauthentic or manipulative use of its service during this election period?
7. Has Telegram complied with the October 2022 requirement to establish a Turkish company and obtain a license from BTK?
8. Has Telegram received any notification from BTK regarding its liabilities under the October 2022 law?
9. Do you have a contingency plan in the event of throttling during the election period?
10. How will Telegram respond and what measures does Telegram have in place should it be required under the October 2022 law to comply with court orders to listen to, record, store, intercept or track communications?
11. Could you provide any additional measures that Telegram has taken regarding platform policy decisions on content moderation?

Thanks in advance for your attention to our questions and feel free to provide any other information you deem relevant.

Sincerely,

Barbora Bukovská, Senior Director for Law and Policy, ARTICLE 19 and
Frederike Kaltheuner, Director for Technology and Human Rights, Human Rights Watch