

Wolt DSA Transparency Report

This report provides information on Wolt's content moderation practices during Feb 17, 2024 - Feb 17, 2025 ("**Reporting Period**") in accordance with the transparency reporting requirements under Articles 15 and 24 of the EU's Digital Services Act (Regulation (EU 2022/2065) ("**DSA**").

Background

Wolt is a Helsinki-based technology company with a mission to bring joy, simplicity and earnings to the neighborhoods of the world. Wolt develops a local commerce platform that connects people looking to order food, groceries, and other goods with people interested in selling and delivering them. Wolt was founded in 2014 and joined forces with DoorDash (NASDAQ: DASH) in 2022. Together, we operate in more than 30 countries today. Our aim is to build the best possible platform to serve merchants, consumers, and couriers in our existing and future markets. At the time of this report, Wolt operates in 19 EU countries. DoorDash does not operate in any EU country, so this report therefore only covers the content moderation practices on the Wolt platform in EU countries. More information is available through www.wolt.com.

Overview of Content Moderation at Wolt

Wolt is a technology company that provides an online platform for consumers, merchants and couriers. It connects people looking to order food and other goods with people interested in selling and delivering them.

Content hosted on the Wolt platform mainly consists of merchant provided content, such as menu information, product descriptions, product images, pricing and merchant profile information. Such content is provided by Merchants and is subject to Wolt's content guidelines, applicable regulations and contractual obligations.

Consumers and couriers do not have the ability to upload or share content to be disseminated on the platform. This means that Wolt does not host or moderate typical user-generated content, such as public reviews, posts, or comments that would be publicly visible to other users of the platform.

Due to the reasons outlined above, the content model adopted significantly reduces the risk of illegal or harmful content being disseminated through the platform, and our moderation practices reflect this operating environment.

Notices Received from Wolt Users, Trusted Flaggers and Member States' Authorities

Wolt has mechanisms in place to allow anyone visiting the Wolt platform to notify Wolt of any content that they consider to be potentially illegal or content that may infringe Wolt's terms and conditions. Our reporting functionality under the DSA article 16 is placed near relevant content on the Wolt platform and allows users to report various types of potential violations, including but not limited to:

- Intellectual property infringement,
- Incorrect or incomplete information, and
- Inappropriate content

Users are requested to provide additional information in free text form in order for Wolt to assess the notice. Currently, Wolt manually reviews the notices received through the notice form and takes appropriate action as required.

During the Reporting Period Wolt received 16 notices through the notice form available through the Wolt platform.

- 4 of the notices were about alleged intellectual property rights infringement.
- 11 of the notices were about allegedly illegal products.
- 1 notice was about allegedly inappropriate content.

Based on Wolt's manual review of the above notices, the content reported was removed from the Wolt platform in 6 of the cases. All of the removed content concerned illegal products.

While all notices were manually reviewed and addressed by our relevant teams in a timely manner, the exact time from receipt to action was not recorded during the Reporting Period in a standardized format. Wolt is currently implementing process improvements and technical updates to its reporting functionality in order to report the median time to take action in its next annual report.

In addition to the 16 notices, Wolt received several submissions via the notice form that were meant for customer support. These were related to specific order issues, such as late deliveries or missing items and not to platform content. Such submissions were handled primarily through Wolt's customer support channel.

During the Reporting Period, Wolt received 0 orders from Member States' authorities and 0 notices from Trusted Flaggers.

Wolt's Own Initiative Content Moderation and Automated Means for Content Moderation

The Wolt platform primarily enables consumers to order goods and services from third-party merchants and, in certain markets, various Wolt group companies sell goods directly to consumers via Wolt's own grocery brand Wolt Market. Content moderation on Wolt operates differently depending on the type of the product offer.

Merchants have access to tools to provide and manage the content on their venue page on the Wolt platform. Subject to Wolt's requirements for the content, merchants are themselves generally able to publish content on the Wolt platform via the tools provided by Wolt.

Where Wolt Market is the seller, the Wolt's own category managers select the products and content managers ensure that the product information is accurately structured and aligned with internal content standards.

In order to become a merchant on the Wolt platform, merchants are required to agree on a comprehensive partner contract, and associated policies and guidelines, such as [Guidelines for Wolt Partners](#). These require merchants to (i) comply with applicable regulations, and guidelines provided by Wolt, (ii) provide all necessary and required information to consumers (iii) warrant that they own or have all the rights or licenses required to provide the content to Wolt, and the content does not violate, infringe, or misappropriate any third party rights.

Wolt may terminate the contract or suspend performance if the merchant does not comply with Wolt's guidelines and contractual obligations. In such a case, Wolt notifies merchants of such breach and termination or suspension.

Reports from users, authorities, and internal reviews and audits are the methods Wolt uses to identify potentially illegal or non-compliant products or other content on the Wolt platform. The internal review practices vary between Wolt's operating countries. At the moment, Wolt does not use automated means for content moderation purposes but is looking into solutions that could be implemented in this regard to create an even safer online environment for its users.

Suspension for Repeated Offenders

Wolt reserves the right, in accordance with DSA Article 23, to impose suspensions on merchants providing manifestly illegal content and/or on anyone submitting manifestly unfounded notices or complaints through Wolt's notice form. During the reporting period, Wolt did not suspend any user pursuant to Article 23 of the DSA for frequently providing manifestly illegal content or manifestly unfounded notices or complaints.

Complaint Handling and Appeals

Our current complaint handling and appeals process is built through our customer support channels. Wolt processes complaints and appeals received through Wolt's customer support via email or in-app messaging, in accordance with its internal policies where, depending on the subject matter, relevant stakeholders are included to assess the complaint.

Out-of-court Dispute Settlement Bodies

During the Reporting Period, Wolt did not receive any complaints through EU out-of-court settlement bodies.

Additional information and disclaimers:

This report is limited to the relevant subject matter. For more information, please review Wolt.com and DoorDash.com, including the information that we have provided in our interim and annual reports.

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