

EXTRAJUDICIAL NOTICE

Courtesy English translation. The Portuguese original ("Notificação Extrajudicial", dated October 19, 2026) is the binding text. Personal identification numbers and addresses of the signatories have been omitted from this copy.

NOTIFYING PARTIES: The organizations that subscribe to this notice.

NOTIFIED PARTY: META PLATFORMS INC. and its subsidiaries in Brazil (Facebook Serviços Online do Brasil Ltda., CNPJ 13.347.016/0001-17), in the person of its Director-General in Brazil, CONRADO LEISTER, headquartered at Avenida Brigadeiro Faria Lima, No. 3732, Edifício B32 (floors 3 to 7, 8 south wing and 9), Itaim Bibi, São Paulo/SP, postal code 04538-132.

ATTN: Conrado Leister — Director-General of Meta in Brazil

REGARDING: Systemic failures in moderation, advertising, reach distribution and artificial intelligence on the Notified Party's platforms during Brazil's 2026 elections — demand for immediate measures before the runoff election.

I. THE FACTS

1. The Notified Party controls the platforms Facebook, Instagram, WhatsApp and Threads, used by hundreds of millions of Brazilians, which make up one of the main spaces for the circulation of information, public debate and electoral dispute in the country. Because of this position, it exerts a decisive influence over the formation of public opinion and the exercise of political rights.

2. Since March 2026, researchers, journalists and civil society organizations have documented failures in the Notified Party's advertising, artificial intelligence and content moderation systems, among them:

a) the organization Ekō showed that 13 (thirteen) of 15 (fifteen) irregular electoral ads submitted in an experiment were approved by the Notified Party's systems;

b) Amnesty International identified failures in advertiser verification and in the detection of electoral disinformation;

c) NetLab/UFRJ found that 68.1% of the 2,326 (two thousand three hundred and twenty-six) ads analyzed attacked institutions or raised suspicions about the conduct of the elections; it also identified 1,613 (one thousand six hundred and thirteen) political ads paid for in dollars between July and September, of which 537 (five hundred and thirty-seven) had no identified payer and, among the payers located, 98.1% were in the United States;

d) the Notified Party, through its Meta AI tool, blocked content associated with the expression "Lula 13" without blocking content associated with "Flávio 22", and on September 23 deactivated the ad account of President Lula's re-election campaign, without any public explanation of the reasons;

e) the VigIA project of Agência Lupa identified 64 (sixty-four) synthetic pieces of content between October 1 and 5, of which 61 (sixty-one) were still online on October 7; and the press reported 568 (five hundred and sixty-eight) irregular ads run during the ban period of the first round;

f) a network of 255 (two hundred and fifty-five) automated profiles, allegedly run by artificial intelligence, reportedly reached approximately 58 (fifty-eight) million views in a single month, simulating support for one candidate and attacking opponents;

g) the organization CTRL+Z gathered more than 1,200 (one thousand two hundred) reports of restrictions and bans during the electoral period, 22% of them without any explanation, affecting ordinary citizens, journalists, social movements and student organizations;

h) the Notified Party states that it removed posts by ministers, journalists and activists in order to “comply with decisions of the TSE”, but without notice, without individualized justification and without an accessible appeal for the people affected.

3. These events led the Federal Public Prosecutor’s Office (MPF) to open, on October 13, a proceeding to investigate the Notified Party’s moderation practices, and the Superior Electoral Court (TSE) to order clarifications on the selective restrictions on content distribution, demanding the moderation records and the concrete justification for each block. On October 16, the TSE unanimously upheld an order of equal treatment among candidates. The Notified Party acknowledged “technical incidents”, although it denies political favoritism.

4. The seriousness is heightened by the failure to honor the public commitments the Notified Party made before the Electoral Court — the announcement of an Operations Center for the 2026 Elections, a Compliance Plan and prior investment of more than US\$ 30 billion in security —, which can be checked point by point:

a) it promised political ads with an identified payer and delivery only in the authorized country, but NetLab/UFRJ identified 1,613 (one thousand six hundred and thirteen) ads paid for in dollars between July and September, 537 (five hundred and thirty-seven) of them without an identified payer;

b) it promised to prevent foreign financing, but, of the 1,076 (one thousand and seventy-six) ads with a located payer, 98.1% are in the United States, which led the TSE to order the suspension of those not authorized;

c) it promised to block inauthentic networks, but the network of 255 (two hundred and fifty-five) automated profiles reached approximately 58 (fifty-eight) million views;

d) it promised to apply the rules equally to candidates, but Meta AI blocked the expression “Lula 13” without blocking “Flávio 22”, and the ad account of Lula’s campaign was deactivated, which led the TSE to unanimously maintain (10/16) an order of equal treatment;

e) it promised not to recommend candidates’ profiles, but on 08/17 Instagram was recommending candidates;

f) it promised to pause political ads during voting, but 568 (five hundred and sixty-eight) irregular ads were identified in the prohibited period of the first round;

g) it promised transparency and appeal in content removals, but CTRL+Z gathered more than 1,000 (one thousand) reports of restrictions and bans, 22% without any explanation;

h) it promised to restrict electoral AI in the final 72 (seventy-two) hours, but NetLab/UFRJ [identified] ads run irregularly during the protected period, and Agência Lupa identified 64 (sixty-four) synthetic

pieces of content, 61 (sixty-one) of them still online days later;

i) it promised to review ads and label AI, but tests by Amnesty International (8 of 14 false ads approved) and by Ekō (13 of 15 AI-made ads approved) prove the failure;

j) it promised real-time monitoring, but Lula's account was deactivated by mistake (09/23), the view counter froze for 5 (five) hours (10/07) and the account was reportedly limited for almost 24 (twenty-four) hours (10/09).

The repeated failure to honor its own commitments before the Electoral Court aggravates the Notified Party's responsibility and shows the insufficiency of the measures announced.

II. THE LAW

5. The Notified Party's conduct offends guarantees ensured by the Federal Constitution (arts. 1, II and V; 5, IV, IX, XIV and LV; 14; and 220), notably due process of law, the right to be heard, freedom of expression and information, and equal treatment in the election.

6. It also violates the Brazilian Civil Rights Framework for the Internet — Marco Civil da Internet (Law No. 12,965/2014), which requires platforms to notify users of removals with a clear justification and in accessible language, ensuring an appeal (arts. 19 and 20); the Consumer Protection Code (arts. 6, III, IV and VI; 20; 39; and 51), as regards the quality, transparency and security of the services provided; and the General Data Protection Law (art. 20), as regards the right to human review of automated decisions.

7. Failure to comply with the duties above, in addition to civil liability, subjects the Notified Party and its officers to the sanctions provided by current legislation, without prejudice to the applicable judicial and administrative measures.

III. THE REQUESTS

In view of the above, the Notified Party is hereby NOTIFIED to adopt, immediately and within a time frame compatible with the electoral calendar, the following measures:

1. Immediately ban the running of paid political-electoral ads from abroad, blocking payments in foreign currency and requiring identification of the real payer (CPF/CNPJ) before any ad runs;

2. Refund and return all revenue earned from irregular electoral ads, making public the amount and its destination;

3. Implement a public transparency dashboard of the Integrity Product Operations Center (IPOC), updated in real time, with the number of banned accounts, removed posts and rejected/approved ads, broken down by platform (Facebook, Instagram, WhatsApp and Threads), category of violation, criterion used and appeal status, with a description, registration date, responsible area, measures taken, resolution deadline and handling status of each occurrence;

4. Provide a public review channel run by people, with an immediate response during the electoral period, and immediately restore content removed and accounts banned for legitimate political expression and in accordance with electoral regulations;

5. Cease the practice of shadowbanning and selective reduction of reach, notifying the user and the TSE of any and all distribution limits, with the specific reason and an appeal channel;
6. Conduct an independent, comprehensive and proactive audit of the recommendation, reach distribution, moderation and advertising algorithms and artificial intelligence tools, actively seeking systemic failures and distortions not yet reported, with public disclosure of the results and access for independent researchers and the competent authorities;
7. Refrain from mass removals without appeal, including when claiming to comply with decisions of the Electoral Court, and account to that Court;
8. Ensure special protection for journalists, media outlets, social movements and civil society organizations;
9. Preserve all moderation logs, decision records and content delivery data, keeping them available for audit by the TSE, the Public Prosecutor's Office and civil society.
10. Open an internal investigation into the violations that have already occurred, identifying the officers and managers responsible for the preparation, supervision and operation of the advertising, artificial intelligence and moderation systems, making public the result of the investigation and the disciplinary measures adopted, and considering the replacement or resignation of those who contributed to serious failures of planning, management or execution.
11. Display, through the messaging mechanism shown at the top of the news feed to all users in the country — a feature Meta itself calls "Megaphone" and has already used in elections —, a notice in which Meta publicly acknowledges the failures and violations that occurred during the 2026 elections and reports the measures adopted to correct them, keeping the notice visible throughout the electoral period.

As a contribution, a concise suggested text is offered, compatible with the space available in the Megaphone:

"We acknowledge that, during the 2026 elections, technical failures in our advertising, moderation and artificial intelligence systems affected the distribution and availability of users' and campaigns' content in Brazil, harming, in particular, candidate Luiz Inácio Lula da Silva. We apologize to Brazil and to voters."

IV. THE DEADLINE

A formal and individualized response is requested within a maximum of 48 hours, by email (contato@ctrlz.org.br), the only viable means considering that the election ends on October 25, accompanied by the measures adopted and by an implementation timeline, in particular for the public transparency dashboard and the human review channel.

V. THE WARNING

In the absence of a satisfactory response, the Notifying Party will forward this notice and the evidence referred to herein to Procon (the consumer protection agency), the National Consumer Secretariat (SENACON), the Federal Public Prosecutor's Office, the National Data Protection

Authority (ANPD) and the other competent authorities, in addition to taking the applicable legal action, without prejudice to holding the Notified Party's officers accountable.

São Paulo, October 19, 2026.

NOTIFYING ORGANIZATIONS:

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