

OpenAI Ireland Limited

OpenAI Ireland Limited
2025 EU Digital Services Act
Transparency Report Cover Letter

Regulation (EU) 2022/2065 (Digital Services Act)

Reporting Period: January - December 2025

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1. Executive Summary

This Transparency Report is published pursuant to Articles 15 and 24 of Regulation (EU) 2022/2065 (the Digital Services Act, “DSA”)¹. It accompanies the standardized transparency reporting templates published by OpenAI Ireland Limited (“OpenAI”) and provides contextual and explanatory information to support interpretation of OpenAI’s reported data.

Purpose of this Report

This Transparency Report is published for the reporting period of **1 January 2025 to 31 December 2025** (the “Reporting Period”).

The purpose of this narrative document is to provide context, explanations, and high-level insights to support the interpretation of the quantitative and qualitative data we have reported. The data published at <https://openai.com/trust-and-transparency/> constitute the authoritative, machine-readable disclosures required under the DSA.

Scope of Reporting

The reported data covers the services described in Section 3 below and applies to activity undertaken during the Reporting Period in the European Union (EU).

Commitment to Transparency and User Rights

OpenAI is committed to transparency, accountability, and the protection of fundamental rights, including freedom of expression and access to information. OpenAI intends to continue refining and improving its disclosures over time.

2. Legal and Regulatory Context

The DSA establishes transparency and accountability obligations for providers of intermediary services in the EU. This report supports compliance with Articles 15(1) and 24(1) of the DSA, which require providers to publish periodic transparency reports describing their content moderation activities, including actions taken in response to government orders, user notices, and complaints, as well as the use of automated tools and human moderation resources.

In accordance with the Commission Implementing Regulation issued for transparency reporting², OpenAI has published its disclosures using the standardized quantitative and qualitative templates. These templates are designed to ensure consistency, comparability, and machine readability across providers.

This narrative document is supplementary in nature and does not replace nor amend the information contained in the standardized templates.

¹ Regulation (EU) 2022/2065, Articles 15 and 24

² Commission Implementing Regulation (EU) laying down templates concerning the transparency reporting obligations under Regulation (EU) 2022/2065

3. About the Service(s) Covered

This report covers the following:

- **ChatGPT Search** - Search the web to provide fast, timely answers with links to relevant web sources. ChatGPT Search may decide to search based on what you ask, or can be manually selected via the search icon.
- **ChatGPT** - An online chat interface that allows individual users to interact with AI models in a conversational manner—individual users submit a request, instruction, uploaded file or question and ChatGPT provides a response.
- **GPTs** - A catalog of GPTs made by builders. It includes a section listing GPTs selected by OpenAI and a leaderboard showing popular GPTs over a recent period.
- **OpenAI Developer Forum** - A community space where developers can ask questions, share learnings, and discuss building with OpenAI tools and products. It supports peer-to-peer help and product discussions, with OpenAI participation/updates in relevant areas.
- **Sora 1 (“Sora”)** - A text-to-video generation model that enables users to generate videos (up to 20 seconds) from text, image, or video prompts.

Geographic Scope

The reported data covers activity relating to recipients of the services located in the EU Member States. Certain metrics, such as member state orders, are further broken down by Member State where required.

4. How to Read the Transparency Data

The accompanying disclosures have been completed in accordance with Annex II of the Commission Implementing Regulation.

The transparency disclosures accompanying this report consist of two components:

1. **Quantitative data**, which provide structured, numerical data on content moderation activities; and
2. **Qualitative data**, which provide narrative descriptions of policies, processes, and safeguards.

Key Definitions and Concepts

For clarity, the following terms are used consistently throughout the transparency disclosures and this report:

- **Orders** refer to legally binding orders issued by Member State authorities pursuant to Articles 9 or 10 of the DSA.
- **Notices** refer to submissions made through notice-and-action mechanisms under Article 16 of the DSA.
- **Own-initiative content moderation** refers to moderation actions that have not been preceded by an order or notice.

- **Measures** refer to actions taken to provide training and assistance to those carrying out human content moderation, as well as actions affecting the availability, visibility, or accessibility of information, or the ability of recipients to use the services.

Methodological Notes

Reported data reflect activity during the Reporting Period and are compiled in accordance with the methodologies described in the templates. Where a reporting field is not applicable, it is left blank. Where a field is applicable but no activity occurred, a value of zero is reported. Median time metrics are reported in hours.³ Where median time metrics are reported at a statement category (e.g, STATEMENT_CATEGORY_PROTECTION_OF_MINORS), the metrics are calculated as the median of subcategory (e.g, KEYWORD_UNSAFE_CHALLENGES) median time metrics and are not weighted by report volume. If the median time to take action is stated at "0 Hours", the median time to take action was between 1 - 30 minutes (i.e., 0.0 - 0.5 hours). If there was only one notice that fell within scope for a given category, median figures are indicated as "N/A".

Comparability and Limitations

Differences in service design, user behavior, legal obligations, and reporting scope mean that data may not be directly comparable across services or reporting periods. In addition, changes to products, policies, or measurement methodologies may result in variations over time. Readers should interpret the data in light of these contextual factors. OpenAI may publish updated versions of this report to correct errors or clarify methodologies, in line with the Implementing Regulation.⁴

5. Overview of Content Moderation Activity

Categories of illegal and incompatible content

OpenAI has presented data around its content moderation activities in accordance with Article 15(1)(c) by the type of illegal content or violation of the terms and conditions, by the detection method and by the type of restriction applied. For "KEYWORD_OTHER" categories, OpenAI has provided contextual information as to the relevant category of illegal content or content incompatible with the terms and conditions. Where categories include data that also correspond to other keyword categories, OpenAI has also indicated this in contextual information.

Government Orders

Information on orders received from Member State authorities is reported pursuant to Article 15(1)(a) of the DSA. This includes orders to act against illegal content and orders to provide information.

Pursuant to Article 11 of the DSA, our Government Request Portal (Kodex) has been designated as OpenAI's point of contact for communications with Member State authorities. OpenAI did not receive any orders pursuant to Article 15(1)(a) of the DSA during the Reporting Period. Users can

³ Annex II to the Commission Implementing Regulation, Part I

⁴ Commission Implementing Regulation, Article 3 (Retention period) and Article 5 (Versioning)

reference our Government Requests for User Data reports at <https://openai.com/trust-and-transparency/>.

Notices and Notice-and-Action

Notices submitted under Article 16 of the DSA, including those from Trusted Flaggers designated under Article 22, are reported in accordance with Article 15(1)(b).

Presented data disclosures

The following are disclosure(s) to be taken into consideration when reviewing tab “4_notices” in the transparency disclosures:

- OpenAI reviews external notices and user reports that allege content violations, each of which includes an initial reported category (i.e., reason). The data presented in tab “4_notices” is presented by the alleged content violation reported by users and trusted flaggers. Following the review of such alleged violations, there are instances in which the reported content was determined to be a violation under a different category than the category selected in the report. In these instances, OpenAI has taken action on the report based on the violation category rather than the initial reporting category. There are also instances when following review, reported content was determined to not to violate applicable law or OpenAI’s terms and conditions. In these instances, the report was closed without further action taken.

Own-Initiative Content Moderation

Content moderation measures taken independently of orders or notices are reported pursuant to Article 15(1)(c). These measures reflect both proactive and reactive enforcement of illegal content and applicable terms and conditions.

Presented data disclosures

The following are disclosure(s) to be taken into consideration when reviewing tabs “5_own_initiative_illegal” and “6_own_initiative_TC” in the templates:

- There are instances in which multiple actions were taken on a single piece of violating content, based on the violation (e.g., visibility restriction removal and account restriction termination). In this case, each separate action would be reported under the applicable DSA category (resulting in a higher number of actions than content).
- Actions may include providing warnings to users prior to taking further action. OpenAI has categorized these warnings under “Provision of the service Suspension”.

6. User Rights and Redress Mechanisms

Users may challenge certain moderation decisions through internal complaint-handling mechanisms in accordance with Article 20 of the DSA. Information on complaints, out-of-court dispute settlement under Article 21, and suspensions imposed pursuant to Article 23 is reported under Articles 15(1)(d) and 24.

7. Use of Automated Tools and Safeguards

OpenAI employs both automated tools and human intervention to support content moderation at scale, consistent with Article 15(1)(e) of the DSA. Automated systems are supplemented by human oversight and safeguards designed to mitigate erroneous or disproportionate outcomes.

8. Reference to Published Templates

The authoritative transparency disclosures are provided in the standardized CSV/XLSX templates published alongside this document. These disclosures remain publicly available for at least five years in accordance with Article 15(3) and Article 24(6) of the DSA.