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**2025 Transparency Report according to Art. 7.2 of Regulation (EU) 2021/784
of 29 April 2021 on addressing the dissemination of terrorist content online
("TCO Regulation")**

for Valve Corporation ("Valve")

Updated version, March 27, 2026

Preamble

Valve is the operator of the PC gaming platform Steam, which provides a variety of services that enable platform users to share user-generated content ("UGC") with each other. In accordance with Article 7(2) of the TCO Regulation, Valve provides the following transparency report. This report includes information under the categories specified in Article 7(3) TCO, as applicable.

In the course of the 2025 calendar year, Valve has on a number of occasions been required by representatives of European law enforcement organizations to take action pursuant to the TCO Regulation.

1. Measures in relation to the identification and removal of or disabling of access to terrorist content

To address the dissemination of illegal and terrorist content across the entire platform Steam, Valve has implemented a variety of measures to establish a safe online environment. This includes the following measures:

a. Reporting measures:

Valve has implemented a comprehensive notice and takedown system where Steam users are able to report any illegal content – including terrorist content – to Valve’s Content Moderation Team.

This system includes and provides escalated access for law enforcement and regulatory bodies to address potential terrorist content.

For regular users, there are multiple methods for reporting illegal or otherwise harmful content on Steam, namely a ubiquitous and low-barrier "flag" icon that users can click to report a page's content as well as the possibility to submit more detailed complaints through the Steam Support Ticket system; both as a logged-in user and anonymously.

b. Community rules:

Every Steam user must adhere to the [Steam Online Conduct](#) rules, which represent community guidelines that are an essential part of the Steam Subscriber Agreement. The Steam Online Conduct rules explicitly prohibit the uploading or posting of illegal content – including but not limited to terrorist content.

If users violate the Steam Online Conduct rules the following actions are taken, depending on the severity of the infraction:

1. Blocking or deletion of user-generated content, such as forum posts or images.
2. Game-specific or platform-wide community bans, meaning that, inter alia, the user is unable to change the name or information on their Steam Community profile, or use any other Community features to share content. The duration can be temporary, ranging from one day to three months, or permanent.
3. Game bans, meaning that a user cannot play competitive online multiplayer (matchmaking) mode or multiplayer mode at all, depending on the game.
4. Account Lock, meaning that the account cannot be used with any game’s community features, the use of official game servers is blocked, and in-game items cannot be moved from the account anymore.
5. Termination of the account.

Compared to other online services, Steam has the benefit that many user accounts carry a value to the users in question through the purchase of games and achievements obtained therein, meaning that community bans and game bans can act as painful and effective sanctions for the distribution of illegal content.

c. Cooperation with Lawful Law Enforcement Inquiries:

Aside from an escalated path for regulatory authorities and law enforcement to have illegal content removed, a dedicated team for law enforcement contacts is provided to enable the identification and prosecution of users who commit offenses through the distribution of illegal content.

2. Measures to address the reappearance online of material which has previously been removed or to which access has been disabled because it was considered to be terrorist content

Valve employs a range of mechanisms to address the reappearance of material which has previously been removed or to which access has been disabled. This includes the use of a site-wide blacklist containing specific text strings that are regularly updated by administrators or legal team members to streamline and enhance the efficiency of content moderation. Additionally, all content moderation team personnel are regularly trained to identify content previously assessed as terrorist in nature to streamline and expedite decision-making processes in edge cases.

For certain types of illegal content, Valve has begun implementing AI-based tools to preemptively flag potentially illegal content and submit it to human moderation before publishing. However, in the context of content that is potentially terrorist in nature, there is still a high degree of human review required.

3. Removal statistics for 2025

In the course of 2025, 52 items of content were removed / access was disabled following removal orders pursuant to Article 3 of the TCO Regulation.

In the same period, there were no occurrences of such items not being removed or access disabled pursuant to the first subparagraph of Article 3(7) and the first subparagraph of Article 3(8) TCO Regulation.

The volume of removal orders and referrals increased compared to 2024, largely due to a Europol Referral Action Day targeting gaming platforms in November 2025. This day alone accounted for 61.5% of all removal orders received in the 2025 calendar year.

Removal orders by issuing Member State:

| Issuing Member State | Number of Removal Orders |
|-----------------------------|---------------------------------|
| Germany | 25 |
| Netherlands | 3 |
| Finland | 23 |
| Luxembourg | 1 |
| Total | 52 |

Removal orders by month:

| Month | Number of Removal Orders |
|---------------|---------------------------------|
| January 2025 | 2 |
| August 2025 | 9 |
| October 2025 | 3 |
| November 2025 | 32 |
| December 2025 | 6 |
| Total | 52 |

4. Complaint statistics for 2025

In 2025,

- a) no complaints were submitted in accordance with Article 10 TCO Regulation;
- b) no administrative or judicial proceedings were brought by Valve;
- c) Valve was not required to reinstate content or access thereto due to an administrative or judicial proceeding; and
- d) Valve was not required to reinstate content or access thereto due to a complaint by a content provider.

The year-over-year increase in the number of removal orders, combined with the facts that Valve complied with all of them and no removal orders were later challenged in court, should not be read as an indication of a prevalence of terrorist content in the sense of the TCO Regulation on the Steam platform.

For the overwhelming majority of removal orders received, Valve disagrees with the assessment of the issuing competent authorities. In Valve's own internal assessment, only a minority of the removal orders received in 2025 target content that would qualify as terrorist content within the specific meaning of Article 2(7) of Regulation (EU) 2021/784, while the rest was found to either conflict with other legal norms or with the contractual terms of the Steam Online Conduct Rules.