

Gaijin Entertainment Digital Services Act Transparency Report

Reporting Period: January 1, 2025 – December 31, 2025

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1. Introduction

Gaijin Entertainment (“**Gaijin**”) is an independent European video game developer and publisher. Through our games and web community services, users can interact with one another and share user-generated content (“**Content**”).

We are committed to maintaining a safe, respectful, and inclusive environment for our community. Positive interactions are an important part of the user experience. Because behavior that violates applicable rules may negatively affect individual users and the wider community, we apply content moderation measures across our games and web community services in accordance with applicable laws and internal policies.

This Transparency Report (“**Report**”) is published in accordance with Article 15 of Regulation (EU) 2022/2065 on a Single Market for Digital Services (“**Digital Services Act**” or “**DSA**”). The Report explains how we moderated user-generated content during the period from February 17, 2024, to December 31, 2024, inclusive (“**Reporting Period**”).

Scope of the Report

This Report applies to Gaijin services that fall within the scope of the Digital Services Act as hosting services and that allow users to create, upload, share, or otherwise make content available to other users.

Accordingly, the Report covers the following services:

Games	Web Community Services
War Thunder	War Thunder Forum War Thunder Live War Thunder Wiki Warthunder.com
Enlisted	Enlisted Forum Enlisted Sandbox

[Crossout](#)

[Crossout Forum](#)

[Bug Reporting System](#)

The content covered by this Report includes, among others, chat messages, usernames, forum posts and publications, comments, artworks, models, and similar materials made available by users.

Gaijin provides its services globally and does not systematically track users' real-time location data. For the purposes of this Report, EU users have been identified based on reasonable best efforts and available indicators, including the language used in the submitted notice or moderated content and, where available, the user's last known country-level location. Gaijin continues to improve its technical and system capabilities to enhance the accuracy of geographic attribution where feasible.

This Report does not cover enforcement actions related to conduct that is not content-based, such as cheating, teamkilling, or other forms of uncompetitive gameplay.

Unless otherwise defined in this Report, terms shall have the meaning given to them in the Digital Services Act, relevant European Commission guidance, applicable national laws of EU Member States, and Gaijin's applicable policies.

2. Overview of Moderation Practices

Article 15(1)(b) and (c) DSA

Rules Governing User Content and Conduct

Gaijin established clear rules defining which content and behavior are permitted and which are prohibited, helping to maintain a safe and respectful environment.

Gaijin's [Terms of Service](#) are supplemented by service-specific rules, including in particular:

- [Game Rules](#) and [Code of Conduct](#), which apply to in-game interactions;
- [Community Guidelines](#), which apply to Gaijin's web community services;
- [Community Guidelines: Digital Services Act](#), which provides additional information for EU users and entities regarding their rights under the Digital Services Act.

Together, these documents constitute the [Terms and Conditions](#) governing the use of Gaijin's services. These rules are publicly available and are applied consistently to all users across Gaijin's services.

Please note that Gaijin moderation teams assess content, including potentially illegal content, primarily for violations of Terms and Conditions rather than directly on the basis of applicable law. Where content is illegal under applicable law, it also constitutes a violation of Gaijin's policies and is addressed accordingly.

How Moderation Works

Gaijin primarily relies on human moderators to identify and address content that may violate its rules. Moderation procedures are applied consistently regardless of how a review is initiated, including through:

- **user notices**, such as in-game reporting tools and reports submitted through web community services; and
- **manual review by moderators on their own initiative**, based on their assessment of content or user behavior.

For certain services not primarily designed for social interaction, content may be subject to pre-moderation before it becomes publicly visible. In such cases, users are informed through the interface and may report content they believe to be illegal or in violation of Gaijin policies.

Throughout the Reporting Period, the use of automated moderation tools was limited. Automated filtering was applied to usernames and, in some games, to content visibility based on user-controlled settings for decals and in-game chat. Further information on the use of automated means is provided in Section 6 of this Report.

Enforcement Measures and Restrictions of the Service

(Article 15(1)(c) DSA)

When a violation of Gaijin's Terms and Conditions is confirmed, Gaijin applies enforcement measures in line with its policies. The specific measure applied depends on the nature, severity, and potential impact of the violation, as well as the user's prior conduct and enforcement history.

Where moderation actions are taken in response to user reports, Gaijin may consider the volume and consistency of such reports as indicators that certain content is perceived by users as disturbing or uncomfortable. However, enforcement decisions are based on a substantive review of the reported content against Gaijin's rules.

Enforcement measures may vary by service and may include:

Enforcement Measure	Description
Formal Warning	A notice informing the user that their content or conduct does not comply with Gaijin's policies
Content Removal or Restriction	Removal of, or limitation of access to, content that violates Gaijin's policies so that it is no longer visible or accessible to other users
Username Renaming	Replacement of a username that violates applicable rules with a neutral default name or a requirement to choose a compliant name
Temporary Feature-Level Restriction	Temporary limitation of access to specific service features, such as in-game chat or communication tools ("mutes" or "devoice"), while allowing continued access to other parts of the service
Permanent Feature-Level Restriction	Permanent limitation of access to specific service features, such as in-game chat or communication tools ("mutes" or "devoice"), while allowing continued access to other parts of the service
Temporary Account Suspension	Temporary restriction of access to the user's Gaijin account, preventing use of the service for a defined period
Permanent Account Termination	Permanent restriction of access to the user's Gaijin account, resulting in loss of access to the relevant services

As a general principle, Gaijin considers formal warnings, temporary feature-level restrictions, and temporary account suspensions to be proportionate and effective measures for first-time or less severe violations. More severe measures, including permanent feature-level restrictions or account termination, may be applied where appropriate, particularly in cases of serious or repeated misconduct.

Certain account-level enforcement measures are subject to additional review or approval by senior moderation staff. This helps ensure consistency and proportionality in enforcement decisions that affect user access to Gaijin's services.

Once an enforcement decision is taken, the affected user whose content was found to be illegal or in violation of Gaijin's policies is notified of the outcome and provided with information on how to appeal.

Training and Support for Moderation Teams

To support consistent and fair application of its policies, Gaijin provides training and ongoing support to individuals responsible for content moderation.

Support measures include onboarding and training by experienced moderators, access to internal moderation guidelines, and role-specific responsibilities focused on particular services or regions. Moderation decisions may be escalated to senior moderation staff for review, and the rationale is communicated to moderation teams to support consistent future enforcement.

Moderation practices are periodically reviewed, and additional training or guidance is provided where necessary. Reports concerning moderators' conduct are reviewed internally in accordance with Gaijin's policies.

3. Orders Received from Member States' Authorities

(Article 15(1)(a) DSA)

Gaijin designated legal@gaijin.net as its point of contact for receiving orders from Member States' authorities under the Digital Services Act.

During the Reporting Period, Gaijin received 0 orders from Member States' authorities.

4. Notices of Illegal Content

(Article 15(1)(b) and Article 16 DSA)

4.1. Meaningful Information on Notice-and-Action Mechanisms

The primary channel for submitting notices of illegal content is through in-service reporting tools available within Gaijin's games and web community services. These tools allow logged-in users to report content directly in the context in which it appears, allowing for the collection of relevant evidence and timely review by Gaijin's moderation teams.

When in-service reporting tools are unavailable, notices of illegal content may be sent to the designated email address, legal@gaijin.net.

Notices received pursuant to Article 16 of the Digital Services Act are reviewed by Gaijin's moderation teams in accordance with Gaijin's Terms and Conditions.

Upon receipt of a notice, the reporting user receives confirmation that the content is under review. If, following review, the moderation teams determine that the content is illegal or otherwise violates Gaijin's policies and enforcement action is taken, the user whose content was reviewed is notified about the outcome through the relevant Gaijin service. Such notifications include the legal basis for the action taken and instructions on how to submit an appeal.

4.2. Reporting Metrics

Volume and Outcomes of Notices of Illegal Content

Gaijin Games

Number of Notices	Number of Enforcement Measures
2,450,126	117,333

Below is a breakdown of the statistics by category of illegal or policy-violating content.

For the avoidance of doubt, the table below reflects unique cases reviewed by moderation teams. Multiple reports for the same content or user were consolidated and counted as a single case.

Illegal / Policy-Violating Content*	Number of Enforcement Measures	
	Temporary Account Suspensions	Devoices
Racism	1	51,096
Xenophobia	0	4,832
Nazism	0	1,778
Other Hateful or Offensive Content	0	13,065
Death Threats and Wishes	0	450
Justification of Terrorism	0	24
Sexual Content	0	3,969
Insults and Profanity	4	38,547
Inappropriate Discussions of Politics and Religion	0	1,547
Spam	45	333
Alcohol and Drugs Discussions	0	46
Staff Impersonation	0	10
Staff Abuse	5	1,187
Discussion of Cheating or Account Trading	9	56
Discussion of Unsporting Conduct	0	386
Provocation	0	7

* When applying enforcement measures, moderators classify violations based on the actual illegal or policy-violating content identified during review, regardless of the category selected by the reporting user. While the outcome of each notice is tracked, it is not always possible to determine whether the original report category was changed during moderation due to technical limitations. The data above, therefore, reflect the final categories applied by the moderators.

Because of the real-time nature of gameplay, in-game chat messages are visible only during active battles and are no longer accessible once a battle ends. As a result, moderation of in-game communication based on user notices primarily focuses on assessing user behavior and, where appropriate, may result in feature or account restrictions.

Gaijin Web Services

Number of Notices	Total Number of Enforcement Measures*
38,712	29,299

* Due to current technical limitations, content-level restrictions on Forums cannot yet be categorized by content type and are therefore not reflected in the table below. We are working to improve reporting granularity while ensuring data accuracy and consistency.

Below is a breakdown of statistics by category of illegal or policy-violating content, excluding content-level restrictions imposed on Forums.

Illegal / Policy-Violating Content*	Number of Enforcement Measures
Racism	1
Harassment	19
Hateful or Offensive Content	4
Violent Content	0
Death Threats	4
Sexual Content	449
Distributing Personal Information	2
Intellectual Property Violations	216
Posting Classified Documents	13
Inappropriate Discussions of Politics and Religion	216
Insults and Profanity	353
Shocking Content	37
Misinformation	5
Staff Abuse	1
Spam	387
Vulgar Language	237
Prohibited Content	73
Deviating From Portal Topic	851
Alcohol and Drugs Discussions	1
Discussion of Cheating or Account Trading	1
Total	2,870

** When applying enforcement measures, moderators classify violations based on the actual illegal or policy-violating content identified during review, regardless of the category selected by the reporting user. For certain web services, technical limitations prevent us from confirming the final classification applied. We are working to implement system improvements to address this issue.*

Trusted Flaggers

In accordance with Article 22 of the Digital Services Act, notices submitted by Trusted Flaggers are prioritized and reviewed by human moderators.

Gaijin received 0 notices from Trusted Flaggers.

Use of Automated Means

During the Reporting Period, 0 notices submitted under Article 16 of the Digital Services Act were processed using automated means.

Median Time to Action*

The time required to review and act on notices varies by service type and the nature of the enforcement measure.

- **Games.** Chat moderation is designed to operate in near-real time. When moderators are present in the relevant session, measures affecting the chat content's visibility may be applied immediately. After the end of a battle, in-game chats are automatically deleted. Users may also turn off chat features or restrict who can message them.

For feature and account restriction measures, actions were typically taken within approximately 1.5 days (36 hours) from receipt of the notice during the Reporting Period.

- **Web Community Services.** Actions were also typically taken within approximately 1.5 days (36 hours) from receipt of the notice during the Reporting Period.

** Due to technical and system limitations, which Gaijin is actively working to improve, individual notice processing times are not measured. The timeframes above reflect typical time-to-action during the Reporting Period and align with the timelines set out in Gaijin's internal policies.*

5. Content Moderation Engaged in at Gaijin's Own Initiative

(Article 15(1)(c) DSA)

5.1. Meaningful Information

In addition to moderation triggered by user notices, Gaijin also conducts content moderation on its own initiative.

The general rules governing moderation, enforcement measures, service restrictions, and the role of human moderators are described in Section 2 of this Report. These rules apply equally to proactive moderation carried out by moderator teams, including manual reviews conducted in the absence of user reports or automated validation filters.

5.2. Reporting Metrics

Due to current technical limitations, Gaijin is not yet able to provide a fully granular breakdown linking specific categories of illegal or policy-violating content to particular types of content or account enforcement measures. In addition, the table below does not include enforcement actions relating to certain web community services, which are reflected separately in Section 6.

Gaijin continues to enhance its internal data systems to enable more detailed transparency reporting in future periods.

Illegal / Policy-Violating Content	Number of Enforcement Measures
Racism	630
Xenophobia	70
Nazism	33
Other Hateful or Offensive Content	319
Death Threats and Wishes	1
Sexual Content	183
Insults and Profanity	641
Inappropriate Discussions of Politics and Religion	75
Spam	137
Alcohol and Drugs Discussions	9
Staff Impersonation	1
Staff Abuse	153
Discussion of Cheating or Account Trading	37
Discussion of Unsporting Conduct	17
Provocation	7
Total	2,313

6. Overall Enforcement Statistics

(Article 15(1)(b) and (c) DSA)

The statistics below cover enforcement actions taken during the Reporting Period in response to user notices as well as through Gaijin's proactive detection and moderation of illegal or policy-violating content.

Gaijin Games

Service	Temporary Account Suspensions	Mutes / Devoices
War Thunder	200	117,735
Enlisted	34	69
Crossout	48	4,312
Crossout Mobile	1	11,793
Total	283	133,909

Gaijin Web Community Services

Service	Account Suspensions	Devoices/ Mutes	Content Removed	Content Hidden
War Thunder Forum	259	887	24,630	—
Warthunder.com	—	39	Pre-moderation is applied	
WT Live	—	—	2,262	3,782
WT Wiki	—	10	58	—
Enlisted Forum	49	62	1,805	—
Enlisted Sandbox	—	—	2	45
Crossout Forum	218	31	521	—
Community Bug Reporting	—	—	740	4,209
Total	526	990	30,018	8,036

Username

During the Reporting Period, Gaijin imposed 6390 enforcement measures for non-compliant usernames across its services, resulting in the usernames being renamed. In Crossout, an additional 72 temporary account suspensions and 20 mutes were applied, which remained in place until the affected users voluntarily changed their usernames to comply with the rules.

When setting or changing a nickname, Gaijin also uses text-based automated validation filters to prevent non-compliant usernames from appearing in the service. Instances where such filters were applied are excluded from the number above, as such usernames were not permitted to be set.

7. Automated Means for Content Moderation

(Article 15(1)(e) DSA)

Gaijin uses limited automated tools to support content moderation across its games, while most moderation activities are carried out by human moderators. During the Reporting Period, such tools consisted primarily of automated validation filters for usernames and user-controlled features available through in-game settings. On Gaijin's web community services, moderation is conducted exclusively by human moderators.

Automated Username Moderation

Gaijin uses automated text-based validation filters for usernames in some mobile games. These filters rely on predefined dictionaries of obscene, offensive, and otherwise inappropriate or illegal terms and symbols in multiple languages.

If any part of a username matches a filtered term or symbol, the username displayed to other users is replaced with a neutral default identifier (for example, "*Player_12345678*"). The original username remains visible to the player. Usernames confirmed to violate Gaijin's rules are added to a prohibited usernames list, preventing their future registration by other players.

User-Controlled Automated Features

In addition to moderation filters, Gaijin provides preventive tools in its game clients that allow users to control their exposure to potentially unwanted content. These features are optional, user-controlled, and do not result in enforcement action against other users.

Depending on the game, such features may include:

- in-game chat filters that blur parts of the messages containing predefined illegal or policy-violating words;
- options to turn off the display of user-generated camouflage or decals that are not historically authentic and may contain inappropriate elements, including where legitimate decals are combined into unwanted symbols;
- settings that may limit the visibility of chat messages from players who have been repeatedly reported for inappropriate behavior;
- settings allowing users to replace other players' usernames with neutral identifiers (such as IDs or random names).

These features are designed to enhance the user experience and give users greater control over the content they encounter during gameplay.

Purposes of Automated Means

Automated tools are used to reduce users' exposure to illegal, offensive, or otherwise inappropriate content, support consistent enforcement of Gaijin's Terms and Conditions, and support a safer and more comfortable gameplay environment.

Indicators of Accuracy and Error Rates

To assess the performance of automated filters, Gaijin monitors recall and false positive rate indicators. Recall reflects how effectively inappropriate usernames are detected, while the false positive rate indicates how often legitimate usernames are incorrectly restricted.

Filters are tested before deployment, and their performance is reviewed and adjusted periodically to maintain an appropriate balance between detection and accuracy.

Safeguards Applied to Automated Means

Automated moderation is subject to safeguards and human oversight. Users may appeal enforcement measures through Gaijin's Support Services available within the relevant game interfaces. Human moderators review appeals and lift the restrictions when an automated decision is found unjustified. Gaijin also improves the filters based on user feedback.

8. Appeals

(Article 15(1)(d) DSA)

Gaijin provides users with the opportunity to appeal content moderation decisions and any related account or feature restrictions if they believe an error has occurred.

Appeals may be submitted through the relevant service's communication channels, typically by contacting a moderator via private message. When submitting an appeal, users are invited to describe the circumstances of the case and provide any relevant supporting information or evidence.

Appeals are reviewed by a human moderator who was not involved in the original decision. Where appropriate, moderators may consult with or escalate cases to senior or lead moderation personnel to ensure an accurate and consistent outcome.

During the review, the original enforcement decision is reassessed and may be upheld, reversed, or modified if a more appropriate outcome is identified. Users are informed when an appeal is

received and are notified of the outcome through the relevant service interface or via direct communication.

Information on how to submit an appeal is available within each service and on the following pages:

- [War Thunder](#)
- [Enlisted](#)
- [Crossout](#)

While Gaijin does not currently provide a separate formal appeal mechanism specifically for decisions not to take action, reporting users may contact moderators via private messages to request clarification or escalation. Gaijin continues to enhance the accessibility and clarity of its appeal processes.

Median Time to Action*

The time required to review and act on appeals during the Reporting Period was 2 days (48 hours).

** Due to technical and system limitations that Gaijin is actively working to address, individual appeal processing times are not measured. The timeframes above reflect typical time-to-action during the Reporting Period and align with the timelines set out in Gaijin's policies.*

9. Out-of-court Dispute Settlements

(Article 21 DSA)

Under the Digital Services Act, users in the European Union have the right to select a certified out-of-court dispute settlement body to resolve disputes related to content moderation decisions made by Gaijin.

During the Reporting Period, Gaijin received 0 disputes submitted to formally certified out-of-court dispute settlement bodies.

10. Suspensions Against Repeated Offenders

(Article 23 DSA)

Repeated Provision of Manifestly Illegal Content

Under the Digital Services Act, Gaijin may suspend, for a reasonable period and after issuing a prior warning, the provision of its services to users who frequently provide manifestly illegal content.

Gaijin does not operate a separate enforcement flow specifically designated for repeated provision of manifestly illegal content. Instead, all violations are assessed in accordance with Gaijin's Terms and Conditions and related internal policies.

Where account suspensions were applied during the Reporting Period, Gaijin took into account the nature and severity of the violation, the user's history of prior infringements and sanctions, and the user's overall conduct. In certain cases, suspensions were based on multiple violations, which could include conduct not directly related to content or content that may have been illegal under applicable law.

Repeated Submission of Manifestly Unfounded Notices or Complaints

Pursuant to the Digital Services Act, Gaijin may also suspend, for a reasonable period of time and after having issued a prior warning, the processing of notices or complaints submitted by users who frequently submit notices or complaints that are manifestly unfounded.

During the Reporting Period, 182 suspensions of access to the notice-and-complaint mechanisms were imposed for repeatedly submitting manifestly unfounded notices or complaints. In addition, Gaijin also imposed other sanctions, including 132 temporary account suspensions and 317 devoices, for abusing the report system by submitting excessive or unjustified notices, in accordance with Section 3 of the Gaijin Code of Conduct.