CHEN, A. *Inside Facebook’s Outsourced Anti-Porn and Gore Brigade, Where ‘Camel Toes’ are More Offensive Than ‘Crushed Heads’*. Available at: http://gawker.com/5885714/inside-facebooks-outsourced-anti-porn-and-gore-brigade-where-camel-toes-are-more-offensive-than-crushed-heads. Accessed on: 20 November 2021.

2 DUARTE, N.; LLANSO, E.; LOUP, A. *Mixed Messages? The Limits of Automated Social Media Content Analysis,* (2018). Available at: https://apo.org.au/sites/default/files/resource-files/2017-11/apo-nid240471.pdf. Accessed on: 16 March 2022.

3 HAUGEN, F. *Formal meeting (oral evidence session):* Draft Online Safety Bill. London: UK Parliament. 2021. p. 49. Available at: https://committees.parliament.uk/event/5594. Accessed at: 28 October 2021.

4 UK PARLIAMENT. *Joint Committee on the Draft Online Safety Bill*. London: [s.n.]. 2021. Available at: https://publications.parliament.uk/pa/jt5802/jtselect/jtonlinesafety/129/12902.htm. Accessed on: 10 March 2022.

5 FREEDOM HOUSE. *Freedom on the Net 2021*: The Global Drive to Control Big Tech. United States, 2021. 43 p. Available at: https://freedomhouse.org/report/freedom-net/2021/global-drive-control-big-tech. Accessed on: 15 November 2021.

6 See the challenges address by the DIGITAL MARKETS ACT. EU COMISSION*, Europe fit for the Digital Age: new online rules for platforms, 2021*. Available at: <https://ec.europa.eu/info/strategy/priorities-2019-2024/europe-fit-digital-age/digital-services-act-ensuring-safe-and-accountable-online-environment/europe-fit-digital-age-new-online-rules-platforms_en>. Accessed on: 15 March 2022.

7 UNITED NATIONS [UN]. Human Rights Council. Report n. A/HRC/RES/32/13. *The promotion, protection and enjoyment of human rights on the Internet: resolution*. Human Rights Council, 2016.

8 UN. Human Rights Council. Report n. A/HRC/38/35. *Report of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression, David Kaye*. Human Rights Council, 2018.

9 JØRGENSEN, R.F.; ZULETA, L. Private Governance of Freedom of Expression on Social Media Platforms: EU content regulation through the lens of human rights standards. *Nordicom Review*, Copenhagen, v. 41, n. 1, p. 51-67, 2020. LAIDLAW, E.B. *Myth or Promise? The Corporate Social Responsibilities of Online Service Providers for Human Righ*ts (ed.). In: TADDEO, M.; FLORIDI, L., *The Responsibilities of Online Service Providers*. Springer, Cham, p. 135-155, Feb., 2017.

10 KLONICK, Kate. Law and Technology: Content Moderation Modulation. *Communications of the ACM*, United States, v. 64, n. 1, p. 29-31, January 2021. Available at: https://cacm.acm.org/magazines/2021/1/249450-content-moderation-modulation/fulltext. Accessed on: 15 November 2021

1 RUGGIE, J. *Just Business: Multinational corporations and human rights*. New York, Norton & Company, 2013.

2 KHONDKER, H.H. Role of the New Media in the Arab Spring. *Globalizations*, v. 8 n. 5, p. 675-679, 2011.

3 COHEN, J. E. *Between truth and power*. Oxford University Press, 2019.

4 RUGGIE, J. *Just Business: Multinational corporations and human rights*. New York, Norton & Company, 2013.

5 RUGGIE, J. *Just Business: Multinational corporations and human rights*. New York, Norton & Company, 2013.

6 Vigeo Eiris. has identified 272 Software & IT Services controversies over the last four years, making this one of the most controversial sectors in its research universe. VIGEO EIRIS, *Human rights in a globalised world:* why do companies need to pay more attention? 2018. Available at: <https://www.vigeo-eiris.com/wp-content/uploads/2018/11/2018_Human-rights-study_VFok.pdf>. Accessed on: 10 November 2021.

7 FREEDOM HOUSE, *Freedom on the Net 2018.* United States, 32 p., 2018. Available at: https://freedomhouse.org/sites/default/files/FOTN\_2018­\_Final.pdf. Accessed on: 15 October 2021.

8 DUNSTAN, A. *Our Human Rights Impact Assessment of Facebook in Myanmar*. Business for Social Responsibility, November 2018. Available at: https://www.bsr.org/en/our-insights/blog-view/facebook-in-myanmar-human-rights-impact-assessment. Accessed on: 10 October 2021.

9 RUGGIE, J. *Facebook in the rest of the world*, 15 November 2018. Available at: https://media.business-humanrights.org/media/documents/files/documents/John\_Ruggie\_Facebook\_15\_Nov\_2018.pdf. Accessed on: 5 October 2021.

20 JØRGENSEN, R.F., A Human Rights-Based Approach to Social Media Platforms, 2021. Available at: <https://berkleycenter.georgetown.edu/responses/a-human-rights-based-approach-to-social-media-platforms>. Accessed on: 10 October 2021.

2 SAMWAY, M. *The Global Network Initiative: how can companies in the information and communications technology industry respect human rights?* In: BAUMANN-PAULY, D.; NOLAN, J (ed.), *Business and Human Rights: From Principles to Practice*. London, Routledge, p. 136-140, 2016.

22 GLOBAL NETWORK INITIATIVES, *GNI Principles on freedom of expression and privacy*, 9 p., May 2017. Available at: https://globalnetworkinitiative.org/gni-principles/. Accessed 10 November 2021.

23 VAN DIJK, P. et al., *Theory and Practice of the European Convention on Human Rights*. Antwerp: Oxford, 2006.

24 In relation to human rights exercised online, this could refer to state intervention through content regulation, surveillance or law enforcement in order to prevent or punish the infringement of human rights. See for example DEIBERT, R. et al. (eds.), *Access Controlled: The Shaping of Power, Rights, and Rule in*

*Cyberspace.* London: The MIT Press, 2010); DEIBERT, R. et al. (eds.), *Access Denied the Practice and Policy of Global Internet Filtering*. London, The MIT Press, 2008.

25 RODRÍGUEZ-GARAVITO, C., *Business and Human Rights: Beyond the End of the Beginning.* United States: Cambridge University Press, 2017.

26 John Ruggie identifies three main issues: (a) ‘prevailing patterns of corporate-related human rights abuse’ (b) ‘existing legal standards and their application to states and business enterprises’ and (c) mapping out ‘the attributes and rapid expansion of voluntary corporate social responsibility initiatives, pointing out their strengths as well as their shortcomings.’ RUGGIE, J. *Just Business: Multinational corporations and human rights*. New York, Norton & Company, 2013.

27 RUGGIE, J. *Just Business: Multinational corporations and human rights*. New York, Norton & Company, 2013.

28 RODRÍGUEZ-GARAVITO, C., *Business and Human Rights: Beyond the End of the Beginning.* United States: Cambridge University Press, 2017.

29 DE BÚRCA, G.; KEOHANE, R. O.; SABEL, C., New modes of pluralist global governance. *International Law and Politics*. New York, v. 45, p. 723-739, 2013.

30 See for example, the previous instruments on which UNGPs rely on: ORGANIZATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT [OECD], *OECD Guidelines for Multinational Enterprises: 2011 Edition*. Available at: <http://mneguidelines.oecd.org/text/>. Accessed om: 5 November 2021; INTERNATIONAL LABOUR ORGANIZATION [ILO], *ILO Declaration on Fundamental Principles and Rights at Work*. International Labour Organization, 1998. Available at: [www.ilo.org/declaration/lang–en/index.htm](http://www.ilo.org/declaration/lang–en/index.htm). Accessed on: 5 November 2021.

3 MELISH, T.; MEIDINGER, E., Protect, Respect , Remedy and Participate: “New Governance” Lessons for the Ruggie Framework, in Radu Mares (ed.), *The UN Guiding Principles on Business and Human Rights: Foundations and Implementations*. : Brill-Nijhoff, Leiden, 34 p., 2012.

32 RODRÍGUEZ-GARAVITO, C., *Business and Human Rights: Beyond the End of the Beginning.* United States: Cambridge University Press, 2017.

33 FLEW, T.; MARTIN, F.; SUZOR, N., Internet Regulation as Media Policy: Rethinking the Question of Digital Communication Platform Governance. *Journal of Digital Media & Policy*, v. 10, n. 1, p. 33-50, 2019.

34 Art. 14. European Union’s Directive on electronic commerce. Report n. 2000/31/EC. Establishes that service providers should not be held liable for content hosted unless (a) they have “actual knowledge” of its illegal nature or (b) upon obtaining such actual knowledge, they fail to act expeditiously to remove or to disable access to the content.

35 ZITTRAIN, J., A History of Online Gatekeeping. *Harvard Journal of Law and Technology*, v. 19, n. 2, p. 253-298, 2006.

36 GILLESPIE, T., Platforms are not Intermediaries. *Georgetown Law Technology Review*, v. 2, n. 2, p. 198-216, 2018.

37 SANDER, B., Freedom of Expression in the Age of Online Platforms: the promise and pitfalls of a human-rights based approach to content moderation. *Fordham International Law Journal*, v. 43, n. 4, p. 939-1006, 2020.

38 DE GREGORIO, G., Democratising online content moderation A constitutional framework. *Computer Law & Security Review*, v. 2, p. 105374, 2020.

39 BALKIN, J., Free Speech in the Algorithmic Society: Big Data, Governance, and New School Speech Regulation. *University of California, Davis Law Review*, v. 51, p. 1149-1210, 2020.

40 FREEDOM HOUSE, *Freedom on the Net 2018.* United States, 32 p., 2018. Available at: https://freedomhouse.org/sites/default/files/FOTN\_2018­\_Final.pdf. Accessed on: 15 October 2021.

4 DE FILIPPI, P.; BELLI, L., The Law of the Cloud v the Law of the Land: Challenges and Opportunities for Innovation. In : DE FILIPPI, P.; BELLI, L., *The Law of the Cloud v the Law of the Land: Challenges and Opportunities for Innovation*. European Journal of Law and Technology, v. 3, n. 2, 23 p., 2012.

42 SANDER, B., Freedom of Expression in the Age of Online Platforms: the promise and pitfalls of a human-rights based approach to content moderation. *Fordham International Law Journal*, v. 43, n. 4, p. 939-1006, 2020.

43 See summary of Special Rapporteur’s Consultations at David Kaye’s report on the issue. UN. Human Rights Council. Report n. A/HRC/38/35. *Report of the Special Rapporteur on the protection and promotion of the right to freedom of opinion and expression*: Overview of submission received in preparation of the Report of the Special Rapporteur. United Nations, 2018.

44 EUROPEAN COURT OF HUMAN RIGHTS. Application No. 5493/7 *Handyside v the United Kingdom*. 1976.

45 HUMAN RIGHTS COMITEE. Report n. CCPR/C/GC/34. *General Comment 34*. United Nations, 2011, paragraph 12. See also: UN. Report n. A/HRC/38/35. *Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression - regulation of user-generated online content*. 2018, paragraph 7.

46 ARNOLD, D. G., Transnational Corporations and the Duty to Respect Basic Human Rights. *Business Ethics Quarterly*, v. 20, n. 3, p. 371-399, 2010.

47 B-TECH, *Bridging Governance Gaps in the Age of Technology – Key Characteristics of the State Duty to Protect*, 2020. Available at: <https://www.ohchr.org/Documents/Issues/Business/B-Tech/b-tech-foundational-paper-state-duty-to-protect.pdf>. Accessed on: 10 November 2021.

48 The scope and potential limitations of the right to freedom of expression are developed in UN Human Rights Committee (HRC), note 35. At the regional level, in the ruling *Editorial Board of Pravoye Delo and Shtekel v Ukraine*. Application n. 33014/05, 2011. The European Court of Human Rights for the first time acknowledged that Article 10 imposes on states a positive obligation to create an appropriate regulatory framework to ensure effective protection of journalists’ freedom of expression on the Internet.

49 B-TECH, *Bridging Governance Gaps in the Age of Technology – Key Characteristics of the State Duty to Protect*, 2020. Available at: <https://www.ohchr.org/Documents/Issues/Business/B-Tech/b-tech-foundational-paper-state-duty-to-protect.pdf>. Accessed on: 10 November 2021.

50 CERQUEIRA, D.; MONTGOMERY, A., *Extraterritorial obligations: a missing component of the UN Guiding Principles that should be addressed in a binding treaty on business and human rights*. Due Process Foundation Blog, Feb. 2018. Available at: https://dplfblog.com/2018/02/08/extraterritorial-obligations-a-missing-component-of-the-un-guiding-principles-that-should-be-addressed-in-a-binding-treaty-on-business-and-human-rights/. Accessed on: 20 March 2022.

5 RODRÍGUEZ-GARAVITO, C., *Business and Human Rights: Beyond the End of the Beginning.* United States: Cambridge University Press, 2017.

52 COMMITTEE ON ECONOMIC, SOCIAL AND CULTRUAL RIGHTS. Report n. E/C.12/GC/24. *General comment No. 24*. On State obligations under the International Covenant on Economic, Social and Cultural Rights in the context of business activities. 2017, paragraphs 25-28.

53 UK PARLIAMENT. *Joint Committee on the Draft Online Safety Bill*. London: [s.n.]. 2021. Available at: https://publications.parliament.uk/pa/jt5802/jtselect/jtonlinesafety/129/12902.htm. Accessed on: 10 March 2022.

54 QIANG, X., How China internet police control speech on the Internet. Radio Free Asia, v. 24, 2008. Available at: <https://www.rfa.org/english/commentaries/china_internet-11242008134108.html>. Accessed on: 29 January 2019.

55 SCHOFIELD, J., *Microsoft takes down Chinese blogger*. The Guardian, 2 January 2006. Available at:

<https://www.theguardian.com/technology/blog/2006/jan/04/microsofttakes>. Accessed on: 24 January 2019.

56 THOMSOM, C., *Google’s China Problem (and China’s Google Problem).* New York Times, 23 April 2006. Available at: <https://www.nytimes.com/2006/04/23/magazine/23google.html>. Accessed on: 24 January 2019).

57 FAZLIOGLU, M., Forget me not: the clash of the right to be forgotten and freedom of expression on the Internet. *International Data Privacy Law*, v. 3, n. 3, p. 149-157, 2013.

58 MACKINNON, R. et al., *Fostering freedom online: The Role of Internet Intermediaries*. Paris, UNESCO Publishing, 2015.

59 UN. Human Rights Council. Report n. A/HRC/38/35. *Report of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression, David Kaye*. Human Rights Council, 2018.

60 HUMAN RIGHTS COMITEE. Report n. CCPR/C/GC/34. *General Comment 34*. United Nations, 2011, paragraph 7.

6 Freedom of expression is not an absolute right, it may be restricted in accordance with the provisions of article 19, paragraph 3 and article 20 of the International Covenant on Civil and Political Rights (ICCPR). Specifically, restrictions should be provided by law and should set with ‘sufficient precision’ the difference between lawful and unlawful expression. Moreover, restrictions must be necessary and proportionate, in accordance with one of the enumerated ‘legitimate purposes’ in article 19 paragraph 3. UN. Human Rights Council. Report n. A/HRC/38/35. *Report of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression, David Kaye*. Human Rights Council, 2018, paragraph 7.

62 OHCHR, Moderating online content: fighting harm or silencing dissent?. United Nations, 23 July 2021. Available at: <https://www.ohchr.org/EN/NewsEvents/Pages/Online-content-regulation.aspx>. Accessed on: 12 November 2021.

63 OHCHR, Moderating online content: fighting harm or silencing dissent?. United Nations, 23 July 2021. Available at: <https://www.ohchr.org/EN/NewsEvents/Pages/Online-content-regulation.aspx>. Accessed on: 12 November 2021.

64 CENTER FOR STUDIES ON FREEDOM OF EXPRESSION AND ACCESS TO INFORMATION [CELE], *Submission to the UN SR on the Protection and Promotion of Freedom of Opinion and Expression*. Universidad de Palermo, Argentina, 23 December 2017.

65 RAMÍREZ, I., *Online Content Regulation and Competition Policy*. HLS Antitrust Association, 3 December 2020. Available at: <https://orgs.law.harvard.edu/antitrust/2020/12/03/online-content-regulation-and-competition-policy/>. Accessed on: 10 November 2021.

66 GLOBAL NETWORKING INITIATIVE [GNI], *Content Regulation and Human Rights: Analysis and Recommendations*, 2020. Available at: <https://globalnetworkinitiative.org/wp-content/uploads/2020/10/GNI-Content-Regulation-HR-Policy-Brief.pdf>. Accessed on: 10 November 2021.

67 B-TECH, *Bridging Governance Gaps in the Age of Technology – Key Characteristics of the State Duty to Protect*, 2020. Available at: <https://www.ohchr.org/Documents/Issues/Business/B-Tech/b-tech-foundational-paper-state-duty-to-protect.pdf>. Accessed on: 10 November 2021.

68 For the role National Human Rights Institutions in achieving policy coherence in the tech sector, see UTLU, D., *Public policy and digital technologies: The role of National Human Rights Institutions in achieving policy coherence*. B-Tech, May 2021. Available at: <https://www.ohchr.org/Documents/Issues/Business/B-Tech/b-tech-blog-policy-coherence-nhris-tech.pdf>. Accessed on: 10 November 2021.

69 DE FELICE, D.; GRAF, A., The potential of National Action Plans to implement human rights norms: An early assessment with respect to the UN Guiding Principles on Business and human rights. *Journal of Human Rights Practice*, v. 7, n.1, p. 40-71, 2015.

70 GOVERNMENT OFFICES OF SWEDEN, *Action plan for business and human rights*. 2015. Here and in the following footnotes, references to NAPs can be found in the OHCHR website, https://www.ohchr.org/en/issues/business/pages/nationalactionplans.aspx. Accessed on: November 2021.

7 GOVERNMENT OF IRELAND, *National Plan on Business and human rights 2017-2020*. 2017. GOVERNMENT OF UNITED KINGDOM, *Good Business: implementing the UN Guiding Principles on Business and Human Rights*. 2016.

72 GOVERNMENT OF POLAND, *Polish National Action Plan for the Implementation of the United Nations Guiding Principles on Business and Human Rights 2017-2020*. 2017.

73 GOVERNMENT OF FINLAND, *National Action Plan for the implementation of the UN Guiding Principles on Business and Human Rights*. 2014.

74 GOVERNMENT OF NETHERLANDS, *National Action Plan on Business and Human Rights.* 2013.

75 UN. Human Rights Council. Report n. A/HRC/38/35. *Report of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression, David Kaye*. Human Rights Council, 2018, paragraph 14.

76 MACKINNON, R. et al., Fostering freedom online: The Role of Internet Intermediaries. Paris, UNESCO Publishing, 2015. GRASSER, U.; SCHULZ, W., Governance of Online Intermediaries: Observations from a Series of National Case Studies. Cambridge: *The Berkman Center for Internet & Society Research Publication*, v. 18, 283 p., 2015.

77 Art. 19, *Internet intermediaries: Dilemma of Liability Q and A.* 2013. Available at: <https://www.article19.org/resources/internet-intermediaries-dilemma-liability-q/>. Accessed on: 10 November 2021. KUCZERAWY, A., Intermediary liability & freedom of expression: Recent developments in the EU notice & action initiative. *Computer Law and Security Review*, v. 31, n. 1, p. 46-56, 2015.

78 BRADLEY, C.; WINGFIELD, R., *A Rights-Respecting Model of Online Content Regulation by Platforms*. London: Global Partners Digital, 2018.

79 GLOBAL NETWORKING INITIATIVE [GNI], *Content Regulation and Human Rights: Analysis and Recommendations*, 2020. Available at: <https://globalnetworkinitiative.org/wp-content/uploads/2020/10/GNI-Content-Regulation-HR-Policy-Brief.pdf>. Accessed on: 10 November 2021.

80 PEN AMERICA, *Forbidden Fees: Government Controls on Social Media in China*, 2018. Available at: <https://pen.org/wp-content/uploads/2018/03/PENAmerica_Forbidden-Feeds-3.13-3.pdf>. Accessed on: 18 November 2021.

8 COMMISION NATIONALE DE L’INFORMATIQUE ET DES LIBERTÉS [CNIL]. Case n. C-507/17.

82 UN. Human Rights Council. Report n. A/HRC/38/35. *Report of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression, David Kaye*. Human Rights Council, 2018, paragraph 19.

83 UN. Human Rights Council. Report n. A/HRC/38/35. *Report of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression, David Kaye*. Human Rights Council, 2018. See the examples of the European Union Internet Referral Unit or specialized offices in Australia and South-East Asia.

84 COMMITTEE ON ECONOMIC, SOCIAL AND CULTRUAL RIGHTS. Report n. E/C.12/GC/24. *General comment No. 24*. On State obligations under the International Covenant on Economic, Social and Cultural Rights in the context of business activities. 2017, paragraphs 25-28.

85 B-TECH, *Key Characteristics of Business Respect for Human Rights, 2020*. Available at: [https://www.ohchr.org/Documents/Issues/Business/B-Tech/key-characteristics-business-respect.pdf.](https://www.ohchr.org/Documents/Issues/Business/B-Tech/key-characteristics-business-respect.pdf.c) Accessed on: 12 November 2021.

86 The Resource Centre is an independent non-profit organization based in the United Kingdom and United States. According to their website, the researchers “draw global attention to the human rights impacts (positive and negative) of companies in their region, seek responses from companies when civil society raises concerns, and establish close contacts with grassroots NGOs, local businesspeople, and others.” Available at: <https://www.business-humanrights.org/en/>. Accessed on: 19 November 2021.

87 RANKING DIGITAL RIGHTS, *Corporate Accountability Index 2020*, 2020. Available at: <https://rankingdigitalrights.org/index2020>. Accessed on: 10 November 2021.

88 RANKING DIGITAL RIGHTS, *Corporate Accountability Index 2018*, 2018. Available at: <https://rankingdigitalrights.org/index2018/report/executive-summary/>. Accessed on: 12 November 2021.

89 KLONICK, K., The Facebook Oversight Board: Creating an Independent Institution to Adjudicate Online Free Expression. *The Yale Law Journal*, v. 129, p. 2418-2499, 2020.

90 META, Progress on Our Commitment to Transparency, Nov. 2021. Available at: <https://about.fb.com/news/2021/11/meta-transparency-report-h1-2021/>. Accessed on: 18 November 2021.

9 UN. Human Rights Council. Report n. A/HRC/38/35. *Report of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression, David Kaye*. Human Rights Council, 2018, paragraph 23.

92 Ranking Digital Rights, note 87.

93 BRADLEY, C.; WINGFIELD, R., *A Rights-Respecting Model of Online Content Regulation by Platforms*. London: Global Partners Digital, 2018.

94 VENTURINI J. et al., Terms of Service and Human Rights: an analysis of online platform contracts. Rio de Janeiro: Revan, 152 p., 2016.

95 Oath is now branded as Verizon Media. However, during its short lifespan (2017-2019), this special team. OATH, Our approach: built on seven pillars, Jan. 2019. Available at: https://www.oath.com/our-story/business-and-human-rights/our-program/. Accessed on: 15 January 2019.

96 ZUCKERBERG, M., A Blueprint for Content Governance and Enforcement, 2018. Available at: <https://www.facebook.com/notes/mark-zuckerberg/a-blueprint-for-content-governance-and-enforcement/10156443129621634/>. Accessed on: 15 January 2019.

97 LOMBANA-BERMÚDEZ, A., *Moderation and Sense of Community in a Youth-Oriented Online Platform*: Scratch’s Governance Strategy for Addressing Harmful Speech, Aug. 2017. Available at: <https://medium.com/berkman-klein-center/moderation-and-sense-of-community-in-a-youth-oriented-online-platform-scratchs-governance-eeac6941e9c9>. Accessed on: 10 November 2021.

98 BYGRAVE, L.,, *Internet Governance by Contract*. Oxford: Oxford University Press, 2015.

99 BAKOS, Y.; MAROTTA-WURGLER, F.; TROSSEN, D. R., Does Anyone Read the Fine Print? Consumer Attention to Standard Form Contracts. *Law & Economics Research,* paper series No. 09-40, 2009. Available at: <https://ideas.repec.org/p/net/wpaper/0904.html>. Accessed on: 10 November 2021.

00 UN. Human Rights Council. Report n. A/HRC/38/35. *Report of the Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression, David Kaye*. Human Rights Council, 2018, paragraph 27.

01 According to Expert Market Research, the industry of content moderation will reach a 12 billion dollars for 2027. CNBC, *Why content moderation costs billions and is so tricky for Facebook, Twitter, YouTube and others*, Feb. 2021. Available at: <https://www.cnbc.com/2021/02/27/content-moderation-on-social-media.html>. Accessed on: 17 November 2021.

02 GORWA, R.; BINNS, R.; KATZENBACH, C., Algorithmic content moderation: Technical and political challenges in the automation of platform governance. *Big Data & Society*, v. 7, n. 1, 15 p., 2020. Available at: <https://doi.org/10.1177/2053951719897945>. Accessed on: 10 November 2021.

03 HAUGEN, F. *Formal meeting (oral evidence session):* Draft Online Safety Bill. London: UK Parliament. 2021. p. 49. Available at: https://committees.parliament.uk/event/5594. Accessed at: 28 October 2021.

04 SANDER, B., Freedom of Expression in the Age of Online Platforms: the promise and pitfalls of a human-rights based approach to content moderation. *Fordham International Law Journal*, v. 43, n. 4, p. 939-1006, 2020.

05 MELISH, T.; MEIDINGER, E., Protect, Respect , Remedy and Participate: “New Governance” Lessons for the Ruggie Framework, in Radu Mares (ed.), *The UN Guiding Principles on Business and Human Rights: Foundations and Implementations*. : Brill-Nijhoff, Leiden, 34 p., 2012.

06 LAIDLAW, E.B. *Myth or Promise? The Corporate Social Responsibilities of Online Service Providers for Human Righ*ts (ed.). In: TADDEO, M.; FLORIDI, L., *The Responsibilities of Online Service Providers*. Springer, Cham, p. 135-155, Feb., 2017.

07 SIKKIINK, K., *The Hidden Face of Rights: towards a politics of responsibilities*. United States: Yale University Press, v. 10, 2020.

08 Ultimately, the experimentalist and polycentric approach proposed by the UNGPs reflect the power relations that exist between governments, companies and civil society organizations, usually leaving the last group as the most vulnerable and unattended one. That’s why some authors have proposed to incorporate a fourth pillar in the business and human rights field, the so called “civil society pillar”. MELISH, T.; MEIDINGER, E., Protect, Respect , Remedy and Participate: “New Governance” Lessons for the Ruggie Framework, in Radu Mares (ed.), *The UN Guiding Principles on Business and Human Rights: Foundations and Implementations*. : Brill-Nijhoff, Leiden, 34 p., 2012.

09 MELISH, T., *Putting “Human Rights” Back into the UN Guiding Principles on Business and Human Rights*:

Shifting Frames and Embedding Participation Rights. In: RODRÍGUEZ-GARAVITO, C., *Business and Human Rights: Beyond the End of the Beginning.* United States: Cambridge University Press, 2017.

10 B-TECH, *Designing and implementing effective company-based grievance mechanisms*, 2020. Available at: <https://www.ohchr.org/Documents/Issues/Business/B-Tech/access-to-remedy-company-based-grievance-mechanisms.pdf>. Accessed on: 12 November 2021.

11 MELISH, T., *Putting “Human Rights” Back into the UN Guiding Principles on Business and Human Rights*:

Shifting Frames and Embedding Participation Rights. In: RODRÍGUEZ-GARAVITO, C., *Business and Human Rights: Beyond the End of the Beginning.* United States: Cambridge University Press, 2017.

12 MARTENS, J., *Corporate Influence on the Business and Human Rights Agenda of the United Nations Working Paper*. Aachen: Bischöfliches Hilfswerk Misereor e.V, 2014.

13 DE SCHUTTER, O., Towards a New Treaty on Business and Human Rights. *Business and Human Rights Journal,* v. 1, n. 1, p. 41-67, 2016.

14 MELISH, T., *Putting “Human Rights” Back into the UN Guiding Principles on Business and Human Rights*:

Shifting Frames and Embedding Participation Rights. In: RODRÍGUEZ-GARAVITO, C., *Business and Human Rights: Beyond the End of the Beginning.* United States: Cambridge University Press, 2017.

15 SIKKIINK, K., *The Hidden Face of Rights: towards a politics of responsibilities*. United States: Yale University Press, v. 10, 2020.

16 SIKKIINK, K., *The Hidden Face of Rights: towards a politics of responsibilities*. United States: Yale University Press, v. 10, 2020.

117 KLONICK, K., The Facebook Oversight Board: Creating an Independent Institution to Adjudicate Online Free Expression. *The Yale Law Journal*, v. 129, 2020. p. 2499.