

Artificial Intelligence and Deepfakes in Political Advertisements

This statement sets forth the policy of TelevisaUnivision, Inc. (“TU”) with respect to the use of artificial intelligence (“AI”) and/or materially deceptive media (“Deepfakes”) in political advertisements that are purchased to run within the United States on any of TU’s broadcast television and radio stations, broadcast and cable programming networks, and/or online and streaming platforms (“TU U.S. Platform”).

TU requires purchasers of political advertising for broadcast, publication, or other dissemination on a TU U.S. Platform to comply with all applicable state and other laws regarding AI or Deepfakes in political advertising (“AI/Deepfake Content”), including any prohibitions or restrictions on AI/Deepfake Content in political advertising and/or any applicable disclosure and other requirements for AI/Deepfake Content.

State laws regarding AI/Deepfakes Content vary widely, including, for example, with respect to how such laws define artificial intelligence and/or materially deceptive media, whether such laws prohibit the use of AI/Deepfake Content, and whether disclosure or other requirements apply to AI/Deepfake Content. Purchasers of political advertising are encouraged to consult with legal counsel as necessary to ensure that any advertising materials supplied to TU satisfy all legal requirements relating to AI/Deepfake Content.

In addition, TU specifically requires political advertisers to comply with the specific disclosure and prohibition requirements set forth below under the heading “**State-Specific Disclosure Requirements**” for each state in which political advertisements are purchased for broadcast, published, and/or disseminated on any TU U.S. Platform.

This policy is subject to federal law in all respects.

By purchasing political advertising to be broadcast, published, and/or disseminated on any TU U.S. Platform, you represent and certify to TU that all political advertising material supplied to TU fully complies with (i) all applicable state and other laws, including laws prohibiting, restricting or otherwise governing artificial intelligence and/or materially deceptive media (each as defined under the applicable state law(s)), in political advertising; and (ii) if applicable, the requirements set forth under the heading “**State-Specific Disclosure Requirements.**”

State-Specific Disclosure Policy for AI-Generated or AI-Modified Media in Political Advertisements

In addition to complying all applicable state and other laws regarding AI/Deepfake Content in political advertisements, any political advertisement purchased for broadcast, publication and/or dissemination on any TU U.S. Platform in any of the following states and that contains AI/Deepfake Content must comply with the disclosure and prohibition requirements set forth below for each state in which the political advertisement purchased for broadcast, publication, and/or dissemination.

California

Any audio-only advertisement or other election communication (each term as defined under California election law) containing materially deceptive content (as defined under California election law) of a candidate for any federal (including candidates for the U.S. presidency/vice presidency), state, or local elected office in California where the candidate portrays themselves as doing or saying something that the candidate did not do or say must include the following disclosure: ***“This audio has been manipulated.”***

The disclosure must be in the same language as used in the advertisement or other election communication and must meet the following requirements, as applicable:

The disclosure must be read in a clearly spoken manner and in a pitch that can be easily heard by the average listener, at the beginning of the audio, at the end of the audio, and, if the audio is longer than two minutes, repeated within the audio at intervals of no more than two minutes.

The California requirements above apply only during the 120-day period before any election in California.

Delaware

Any advertisement that contains a “deepfake” or “synthetic media” (as those terms are defined under Delaware election law) of a candidate or other “depicted individual” (as defined under Delaware election law) without the consent of the candidate or other “depicted individual” must include the following disclosure: ***“This (image/video/audio) has been altered or artificially generated.”*** The disclosure must meet the following requirements, as applicable:

1. **Audio-Only:** The disclosure must be read in a clearly spoken manner and in a pitch that can be easily understood by the average listener at the beginning and end of the audio and, if the audio is longer than two minutes, repeated within the audio at intervals of two minutes.
2. **Visual Media:** The disclosure must in a size that is easily readable by an average reader and no smaller than the largest font size of other text in the visual media. If the visual media is a video, the disclosure must appear for the duration of the video.

By purchasing advertising for broadcast, publication and/or dissemination on any TU U.S. Platform in Delaware, you represent and certify to TU that all advertising material supplied to TU by you does not contain a deceptive and fraudulent “deep fake” (as defined under Delaware election law).

The Delaware requirements above apply only during the 9-day period before any election in Delaware.

Michigan

Any “qualified political advertisement” (as defined under Michigan law) that contains any image, audio, or video that is generated in whole or substantially with the use of AI (as defined under Michigan law) must state that the qualified political advertisement was generated in whole or substantially by AI. The disclosure must be in the same language as used in the qualified political advertisement and must meet the following requirements, as applicable:

1. **Graphic:** The disclosure must appear in letters at least as large as the majority of the text in the graphic communication.

2. **Audio-Only:** The disclosure must be spoken in a clearly audible and intelligible manner at the beginning or end of the communication for at least 3 seconds.
3. **Video with Audio:** The disclosure must do both of the following:
 - a. Appear for at least 4 seconds in letters at least as large as the majority of any text communication, or if there is no other text communication, in a size that is easily readable by the average viewer.
 - b. Be spoken in a clearly audible and intelligible manner at the beginning or end of the communication for at least 3 seconds.

New Mexico

Any political “advertisement” (as defined under New Mexico election law) that contains “materially deceptive media” (as defined under New Mexico law) must include the following disclaimer in a clear and conspicuous manner: ***“This [image/audio/video] has been manipulated or generated by artificial intelligence.”*** The disclosure must appear in every language used in the advertisement and must meet the following requirements, as applicable:

1. **Audio-Only:** The disclosure must be read in a clearly spoken manner and in a pitch that can be easily heard at the beginning and end of the audio and, if the audio is longer than two minutes, repeated within the audio at intervals of two minutes.
2. **Visual Media:** The disclosure must in a size that is easily readable. If the visual media is a video, the disclosure must appear for the duration of the video.
3. **Mixed Media:** The disclosure must be provided in the same form as required for each type of media used.

New York

Any political communication (as described by New York law) that was produced by or includes “materially deceptive media” (as defined under New York law) must disclose the use of materially deceptive media. The disclosure must be in the same language as used in the political communication and must meet the following requirements, as applicable:

- **Visual Media:** ***“This [image, video, or audio] has been manipulated.”*** The disclosure must be printed or typed in a legible font size easily readable by the average viewer that is no smaller than other text appearing in the visual media.
- **Audio-Only:** ***“This audio has been manipulated.”*** The disclosure must be clearly spoken in a pitch that can be easily heard by the average listener at the beginning and end of the audio. If the audio is longer than two minutes, the disclosure must be repeated within the audio at intervals of two minutes.