

# Confirmation Decision: Investigation into Youngtek Solutions Ltd's failure to comply with requirements to implement Highly Effective Age Assurance

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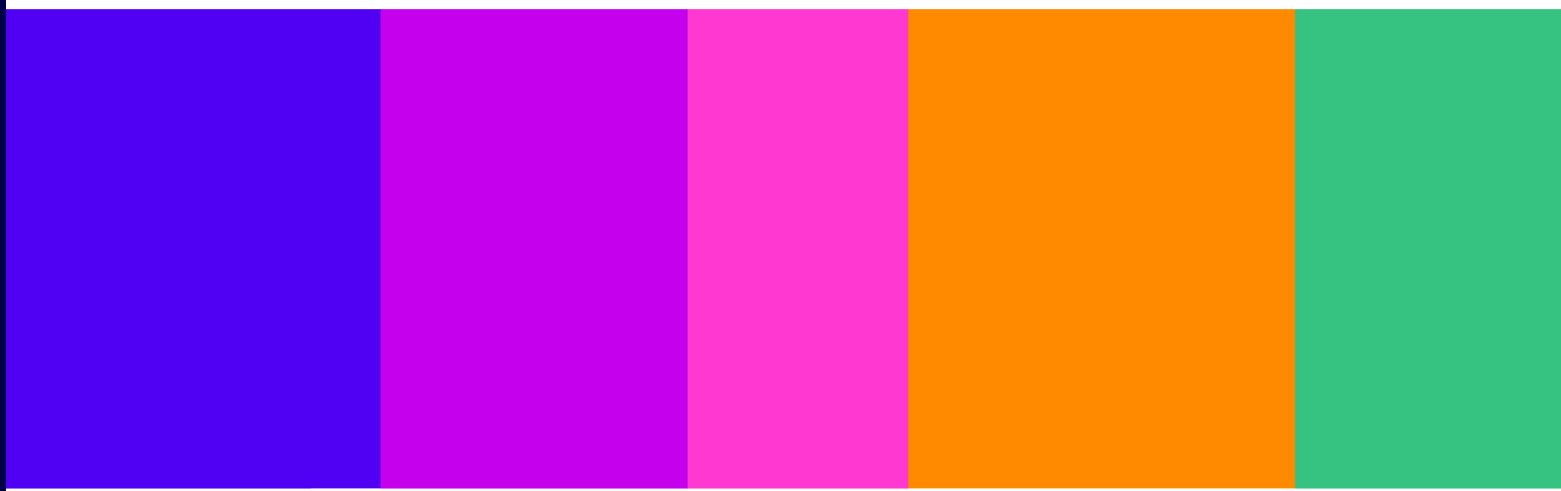
Issued under section 132 of the Online  
Safety Act 2023

Non-confidential version – redactions marked with [✂]

## **Non-confidential Confirmation Decision**

Issued: 17 June 2026

Case reference: CW/01319/09/25



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# 1. Overview

- 1.1 This is a Confirmation Decision (**'Confirmation Decision'**) under section 132(3) of the Online Safety Act 2023 (the **'Act'**) in respect of Youngtek Solutions Ltd, which operates the websites empflix.com, imagefap.com, moviefap.com and TNAflix.com.
- 1.2 For the purposes of this Confirmation Decision, Youngtek Solutions Ltd is referred to as **'Youngtek Solutions'** unless otherwise stated. Where Ofcom refers to all websites listed above, it will use the term **'Youngtek Solutions Websites'**.
- 1.3 For the reasons given in this document, Ofcom considers that Youngtek Solutions has failed to:
  - a) comply with its duties under section 12 of the Act to protect children from encountering pornographic content through the use of highly effective age assurance; and
  - b) comply with a statutory information request issued by Ofcom under section 100 of the Act (**'the Notice'**).

## What Ofcom has decided – in brief

### Failure to comply with Section 12 of the Act

From 25 July 2025, section 12 of the Act required Youngtek Solutions to implement age verification and/or age estimation (collectively referred to as **'age assurance'**) that is highly effective at determining whether a user is a child, in order to prevent children from encountering pornographic content on its services.

Ofcom has determined that Youngtek Solutions has failed to comply with this requirement. During the period from 25 July 2025 to 22 September 2025 (the **'Relevant Period'**), each of the Youngtek Solutions Websites failed to implement age assurance measures. The duration of non-compliance differed between the services, as set out in Section C. As a result, children were not effectively prevented from encountering pornographic content on the services.

As of 22 September 2025, age assurance was implemented on all Youngtek Solutions Websites.

On 11 February 2026, Ofcom issued a Provisional Notice of Contravention (**'Provisional Decision'**) to Youngtek Solutions setting out our provisional findings. Youngtek Solutions submitted written representations by the stipulated deadline. Having reviewed these and all the relevant evidence, Ofcom has determined that, during the Relevant Period, Youngtek Solutions failed to comply with its duties under the following provisions of Part 3 of the Act as set out below:

- Section 12(3)(a): a duty to operate a service using proportionate systems and processes designed to prevent children of any age from encountering, by means of the service, primary priority content that is harmful to children.
- Section 12(4): a duty to use age verification or age estimation (or both) to prevent children from encountering primary priority content that is harmful to children which the provider identifies on the service.
- Section 12(6): a duty to ensure that any age verification or age estimation used is highly effective at correctly determining whether or not a particular user is a child.

As a result of the above breaches, Ofcom imposes a single penalty of £500,000 on Youngtek Solutions in respect of its failure to comply with the duties under Section 12 of Part 3 of the Act.

### **Failure to comply with Ofcom's Information Notice**

On 10 September 2025, Ofcom issued a statutory information request ('**the Notice**') to Youngtek Solutions in connection with Ofcom's investigation, with a deadline of 24 September 2025, requiring Youngtek Solutions to provide information regarding its qualifying worldwide revenue ('**QWR**') and a complete list of all services operated by Youngtek Solutions. At the time of issuing the Provisional Decision, Youngtek Solutions had not provided a substantive response to the Notice. Although Youngtek Solutions subsequently provided the information requested after the Provisional Decision and prior to this Confirmation Decision, the information was not provided by the specified deadline.

Ofcom has determined that Youngtek Solutions has contravened its duty under section 102(8) of the Act to act in accordance with the requirements of the Notice issued under section 100 of the Act.

As a result of the above breach, Ofcom imposes a single penalty of £100,000 on Youngtek Solutions in respect of its contravention of Section 102(8)(a) of the Act.

**The overview section in this document is a simplified high-level summary only. Our findings and reasoning are set out in the full document.**

## 2. Legal Framework

2.1 The Act creates a new regulatory framework with the general objective of making regulated internet services safer for users in the United Kingdom (UK), particularly for children.<sup>1</sup>

### Scope of the Act

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2.2 This framework applies to regulated internet services, including those that host pornographic content. An “internet service” is broadly defined as any service made available via the internet.

#### Internet services subject to the Part 3 duties

2.3 Part 3 of the Act places duties of care on providers of user-to-user services and search services with “links with the United Kingdom”. The duties extend only to the design, operation and use of the service in the UK and, for duties expressed to apply in relation to “users”, as it affects the UK users of the service.<sup>2</sup>

2.4 A service is a regulated user-to-user service (**‘U2U service’**) under the Act<sup>3</sup> if:

- a) it is an internet service<sup>4</sup> by means of which content<sup>5</sup> that is generated directly on the service by a user<sup>6</sup> of the service or uploaded to or shared on the service by a user of the service, may be encountered<sup>7</sup> by another user, or other users, of the service;<sup>8</sup>
- b) it has “links with the United Kingdom”; and
- c) it is not an exempt service under Schedule 1<sup>9</sup> or a service described in Schedule 2 (services combining user-generated content or search content not regulated by the Act with pornographic content that is regulated).<sup>10</sup>

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<sup>1</sup> Under section 3 of the Communications Act 2003, Ofcom must further the interests of citizens and consumers and, in carrying out its online safety functions, secure the adequate protection of citizens from harm, having regard in particular to the risks of harm on regulated services, the need for a higher level of protection for children, and the need for proportionate, transparent and accountable regulatory action (including ensuring providers can comply with their duties in a proportionate way).

<sup>2</sup> Section 8(3) of the Act.

<sup>3</sup> A regulated user-to-user service is defined in section 4(2) of the Act. Reference in the Act to a U2U service include a service provided from within and outside of the United Kingdom (section 204(1)).

<sup>4</sup> Section 228(1) “a service that is made available by means of the internet”.

<sup>5</sup> “Content” means anything communicated by the means of an internet service, whether publicly or privately, including written material or messages, oral communication, photographs, videos, visual images, music and data of any description (section 236(1)).

<sup>6</sup> “User” is defined in section 227 of the Act and includes registered and unregistered users (section 227(2)).

<sup>7</sup> “Encounter” in relation to content, means read, view, hear or otherwise experience content (section 236(1)).

<sup>8</sup> Section 3(1). It does not matter if content is actually shared with another user or users as long as a service has a functionality that allows such sharing, and it does not matter what proportion of content on a service is user-to-user content (section 3(2)).

<sup>9</sup> Exempt U2U services under Schedule 1 include where the only user-generated content enabled by the service is email, SMS, MSS or one-to-one live aural communication, services where functionalities are limited to posting reviews or comments relating to provider content, where the U2U service is an internal business service, or where it is provided by a public body, and by education or childcare provider.

<sup>10</sup> Section 4(2)(b) of the Act.

## Links with the United Kingdom

- 2.5 A U2U service has “links with the United Kingdom”<sup>11</sup> if one or more of the following criteria are met:
- a) the service has a “significant number of United Kingdom users”;<sup>12</sup>
  - b) “United Kingdom users form one of the target markets for the service (or the only target market)”; or
  - c) the service is capable of being used in the United Kingdom by individuals and there are reasonable grounds to believe that there is a material risk of significant harm<sup>13</sup> presented to individuals in the United Kingdom by user-generated content<sup>14</sup> present on the service.<sup>15</sup>
- 2.6 The Act does not prescribe a threshold for what constitutes a “significant number” of UK users or a “target market.” Ofcom considers these factors on a case-by-case basis, taking into account the nature and context of the service and all relevant evidence.
- 2.7 Providers of regulated services must comply with the relevant duties in the Act, regardless of whether they are based in the UK or not. The Act treats the “provider” as being the entity that has control over who can use the U2U service (and that entity alone).<sup>16</sup> If no entity has control over who can use the user-to-user part of a U2U service, but an individual or individuals have control over who can use that part, the provider of the service is that individual or those individuals.<sup>17</sup>

## Children’s Access Assessments

- 2.8 Sections 35 and 36 of the Act require providers of regulated U2U services in scope of Part 3 to carry out a Children’s Access Assessment (“CAA”) in relation to each service. The purpose of a CAA is to assess and determine:
- a) whether children are able to access the service, or any part of the service; and
  - b) where children are able to access the service, whether the service meets the “child user condition” within the meaning of the Act.<sup>18</sup>

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<sup>10</sup> Section 4(5) of the Act.

<sup>12</sup> A “user” is a “United Kingdom user” if the user is an individual in the United Kingdom or an entity incorporated or formed under the law of any part of the United Kingdom (section 227(1)).

<sup>13</sup> The Act defines “harm” in section 234(1) as meaning “physical or psychological harm”. Under section 234(10), reference to “risks of harm” is to be read in the same way as “harm”. Section 234 gives further interpretation of risks of “harm” presented by content.

<sup>14</sup> Under section 4(8), “user generated content” has the meaning in section 55(3) and (4). Under those sections, it is content that is (a) generated directly on the service by a user of the service or uploaded to or shared on that service by a user of the service and (b) that may be encountered by another user, or other users, of the service by means of the service. It includes content generated, uploaded or shared by means of software or an automated tool applied by the user. Section 55(4)(b) addresses when a bot or automated tool is regarded as a user.

<sup>15</sup> Section 4(6).

<sup>16</sup> Section 226(2). “Entity” means a body or association of persons or an organisation, regardless of whether the body, association or organisation is formed under the law or any part of the UK or of a country outside the UK, or a legal person under the law which it is formed (section 236(1)).

<sup>17</sup> Section 226(3).

<sup>18</sup> Section 35(3) of the Act

- 2.9 Under section 35(2) of the Act, a provider may only conclude that children are *not* able to access a service, or any part of it, where the service uses age-verification or age-estimation measures that have the effect that children are not normally able to access that service or that part of it.
- 2.10 Section 36 of the Act further requires providers to complete, record in writing, and retain a CAA for each relevant service. Providers were required to complete and record their first CAA by the statutory deadline of 16 April 2025.<sup>19</sup>
- 2.11 Where a provider has failed to complete the first required CAA by that statutory deadline, sections 37(4) and (5) of the Act provide that the service is to be treated as “likely to be accessed by children” from 16 April 2025 until such time as a CAA is completed and recorded.<sup>20</sup>
- 2.12 Section 12 of the Act sets out the safety duties that apply in relation to regulated U2U services that are “likely to be accessed by children”. Accordingly, where a service is treated as “likely to be accessed by children” under section 37 of the Act, the duties in section 12 apply to that service.

### Section 12 children’s safety duties

- 2.13 Section 12 of the Act imposes the following core duties relating to age assurance on service providers in scope of Part 3:
- a) to operate a service using proportionate systems and processes designed to prevent children of any age from encountering, by means of the service, primary priority content<sup>21</sup> that is harmful to children; and
  - b) to comply with that duty through the use of age verification<sup>22</sup> or age estimation<sup>23</sup> (or both) to prevent children of any age from encountering primary priority content that is harmful to children which the provider identifies on the service.
  - c) Where a provider is required to use age verification or age estimation to comply with the duty to prevent children from encountering primary priority content that is harmful to children, the provider must use age verification or age estimation (or both) that is highly effective at correctly determining whether or not a particular user is a child.
- 2.14 The requirement to use age verification or age estimation applies in relation to a particular kind of primary priority content that is harmful to children in all cases, except where:
- a) the provider’s terms of service prohibit the presence of that kind of primary priority content on the service (however expressed), and

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<sup>19</sup> Section 36(1) and Schedule 3 of the Act

<sup>20</sup> Meaning of “likely to be accessed by children”: 37(4) The second case is where the provider of the service fails to carry out the first children’s access assessment as required by section 36(1).

(5) In that case—

(a) the service is to be treated as likely to be accessed by children from the date by which the first children’s access assessment was required to have been completed (see Part 1 of Schedule 3), and

(b) the service is to continue to be treated as likely to be accessed by children by reason of subsection (4) until such time as the provider completes the first children’s access assessment of the service.

<sup>21</sup> Section 12(3)(a). Section 61 sets out the definition of “primary priority content that is harmful to children”.

<sup>22</sup> Section 230(2) states that “age verification” means any measure designed to verify the exact age of users of a regulated service.

<sup>23</sup> Section 230(3) states that “age estimation” means any measure designed to estimate the age or age-range of users of a regulated service.

- b) that prohibition applies to all users of the service.<sup>24</sup>

### **Kinds of primary priority content harmful to children**

- 2.15 Primary priority content that is harmful to children includes pornographic content.<sup>25</sup>
- 2.16 Pornographic content means content of such a nature that it is reasonable to assume that it was produced solely or principally for the purpose of sexual arousal.<sup>26</sup>
- 2.17 Not all pornographic content is included as primary priority content. The following content is expressly excluded:
  - a) Pornographic content that consists only of text; or
  - b) Consists only of text accompanied by:
    - i) identifying content which consists only of text;
    - ii) other identifying content which is not itself pornographic content;
    - iii) a GIF which is not itself pornographic content;
    - iv) an emoji or other symbol; or
    - v) any combination of content listed in (i) to (iv).<sup>27</sup>

### **Protection of Children Codes of Practice**

- 2.18 Ofcom has also had regard to the Protection of Children Codes of Practice<sup>28</sup>, which are prepared and issued under the Act. As set out in the Codes, Ofcom is required to prepare and issue Codes of Practice for providers of Part 3 services, describing measures recommended for the purpose of complying with the statutory duties imposed on those providers, including the children’s safety duties in section 12 of the Act. The Act further provides that where a provider implements the measures recommended to it in a Code, it is to be treated as complying with the relevant duty or duties to which those measures relate, as identified in the Code’s index of recommended measures. Under Section 50 of the Act, when Ofcom is making a decision arising in connection with its statutory functions, it must take account of any relevant part of a Code of Practice provided that part of the Code was in force at the time and is relevant to the issue Ofcom is considering.
- 2.19 Code measure PCU B2 applies to user-to-user services likely to be accessed by children, whose principal purpose is the hosting or dissemination of one or more kinds of primary priority content (as set out above, this includes pornographic content).
- 2.20 This measure recommends that such services implement highly effective age assurance at the point of entry to the service, ensuring that children are prevented from accessing any part of the service until they have successfully completed a highly effective age assurance check. Age assurance should operate before any user can view or interact with the service, so that no primary priority content is accessible to a user who has not been confirmed as an adult.
- 2.21 Code measure PCU B4 applies to user-to-user services likely to be accessed by children that:

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<sup>23</sup> Section 12(5).

<sup>25</sup> Section 61(1) and (2).

<sup>26</sup> Section 236.

<sup>27</sup> Section 61(6).

<sup>28</sup> [Protection of Children Code of Practice for user-to-user services](#), issued 4 July 2025.

- a) do not have the principal purpose of hosting or disseminating primary priority content; and
  - b) either permit one or more kinds of primary priority content under their terms of service, or prohibit all primary priority content in their terms but are unable, at present, to effectively remove such content.
- 2.22 This measure recommends that such services implement highly effective age assurance mechanisms to ensure that children are prevented from encountering primary priority content identified on the service. Age assurance should operate wherever children could otherwise be exposed to primary priority content, and must be sufficiently reliable to prevent access until an adult user has successfully completed the age assurance process.
- 2.23 Providers may choose alternative measures to those set out in the Codes, but must be able to demonstrate that such measures enable them to comply with their statutory duties under section 12 of the Act, including the requirement to implement highly effective age assurance.<sup>29</sup>

### Age verification and age estimation

- 2.24 As set out above, where a provider is required to use age verification or age estimation to prevent children from encountering pornographic content, the method used must be highly effective at accurately determining whether a user is a child.<sup>30</sup>
- 2.25 A measure which requires a user to self-declare their age (without more) is not to be regarded as age verification or age estimation.<sup>31</sup>
- 2.26 Ofcom's 'Guidance on highly effective age assurance for Part 3 Services'<sup>32</sup> ('the **Guidance**') explains that regardless of where the age assurance occurs in the ecosystem or whether it is implemented by the service provider or by a third-party, it is the responsibility of the regulated U2U service provider to ensure that age assurance is implemented in such a way that it is highly effective at determining whether or not a user is a child.

### Kinds of age assurance that are capable of being highly effective

- 2.27 The Guidance sets out<sup>33</sup> a non-exhaustive list of methods considered capable of being highly effective, including:
- open banking;
  - photo-identification matching;
  - facial age estimation;
  - mobile-network operator (MNO) age checks;
  - credit card checks;
  - email-based age estimation; and
  - Digital Identity Services.

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<sup>29</sup> [Protection of Children Code of Practice for user-to-user services](#)

<sup>30</sup> Section 12(6).

<sup>31</sup> Section 230(4).

<sup>32</sup> [Guidance on highly effective age assurance for part 3 services](#), published 24 April 2025.

<sup>33</sup> See paragraphs 3.7 to 3.13 of Ofcom's [Guidance on highly effective age assurance for part 3 services](#).

- 2.28 Additionally, the Guidance sets out details of the kinds of age assurance that **are not capable** of being highly effective, including:<sup>34</sup>
- self-declaration of age;
  - age verification through online payment methods which do not require a user to be over the age of 18; and
  - general contractual restrictions on the use of the regulated service by children.
- 2.29 The Guidance further notes that implementing one of the example methods is not a guarantee that the service is acting in accordance with the requirements of the Act – service providers need to be able to demonstrate that the method has (or methods have) been implemented in such a way that ensures the overall process as a whole is highly effective.<sup>35</sup>
- 2.30 To be considered highly effective, age assurance should meet each of the following four criteria:<sup>36</sup>
- technically accurate;
  - robust;
  - reliable; and
  - fair.

## Ofcom's information gathering powers and relevant duties on providers

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- 2.31 Under section 100(1) of the Act, Ofcom may require providers of regulated services (and other persons) to provide them with any information required for the purposes of exercising, or deciding whether to exercise, any of Ofcom's online safety functions.<sup>37</sup> This includes any information required for the purposes of assessing compliance with any duty or requirement set out in section 12 of the Act.
- 2.32 Section 100(4) requires that the powers conferred by section 100(1) of the Act must be exercised in a way that is proportionate to the use to which the information is to be put in the exercise of Ofcom's functions.
- 2.33 Section 100(5) sets out the persons who are required to provide Ofcom with the information as described in Section 100(1). This includes a provider of a user-to-user service or a search service,<sup>38</sup> and a person who appears to Ofcom to have, or to be able to generate or obtain, information required by Ofcom.
- 2.34 Section 100(6) outlines the purposes for which Ofcom may require the provision of information. Ofcom has set out the relevant duties for which it sought the information requested in the Notice below.

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<sup>34</sup> See paragraphs 3.14 to 3.16 of Ofcom's [Guidance on highly effective age assurance for part 3 services](#).

<sup>35</sup> See paragraph 3.3 of Ofcom's [Guidance on highly effective age assurance for part 3 services](#).

<sup>36</sup> The full, detailed criteria to ensure an age assurance process is highly effective is set out in Section 4 of Ofcom's [Guidance on highly effective age assurance for part 3 services](#).

<sup>37</sup> Section 100(5) sets out the persons to whom Ofcom has the power to issue an information notice under the Act. Ofcom's power to request information includes, under section 204(2), a power to request documents held outside the UK.

<sup>38</sup> Section 100(5)(a).

- 2.35 Under section 102(8)(a) of the Act, a person who received an information notice under section 100 of the Act has a duty to act in accordance with the requirements of the notice. This includes responding to the information notice by the deadline set out in the notice.

## Service of notices

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- 2.36 Section 208(2)(d) of the Act allows Ofcom to serve a notice by sending it by email to a person's email address.
- 2.37 Under section 208(10) of the Act, a person's email address for this purpose is: (a) any email address published for the time being by that person as an address for contacting that person; or (b) if there is no such published address, any email address by means of which Ofcom believes, on reasonable grounds, that the notice will come the attention of that person or (where that person is an entity) any director or other officer of that entity.<sup>39</sup>
- 2.38 Under section 208(11) a notice sent by email is treated as served 48 hours after it was sent, unless the contrary is proved.

## Ofcom's powers to issue Confirmation Decisions

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- 2.39 Where Ofcom has issued a Provisional Decision to a person and the period allowed for representations has expired, Ofcom has powers under section 132(3) of the Act to issue a Confirmation Decision to that person if they are satisfied that the person has failed, or is failing, to comply with a notified requirement. For the purposes of section 132, a 'notified requirement' means a duty or requirement to which a Provisional Decision relates.
- 2.40 A Confirmation Decision issued by Ofcom may require the person to pay a penalty.<sup>40</sup> A Confirmation Decision must contain information about any penalty imposed, including information about the consequences of not paying a penalty.<sup>41</sup>

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<sup>39</sup> Section 208 of the Act defines "officer" in relation to an entity, as including a director, a manager, a partner, an associate, a secretary or, where the affairs of the entity are managed by its members, a member.

<sup>40</sup> Section 132(5).

<sup>41</sup> Section 137(5)

# 3. Ofcom’s investigation and final determinations

**Content warning – explicit descriptions of sexual activity included in this section**

## A: Ofcom’s investigation

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- 3.1 On 16 January 2025, Ofcom announced it was opening an enforcement programme into the implementation of age assurance measures by certain regulated providers of pornographic content. On 25 July 2025, Ofcom expanded the enforcement programme to include assessing the implementation of age assurance by services that allow user-generated pornographic content.<sup>42</sup>
- 3.2 From 25 July 2025 Ofcom conducted reviews of services whose primary purpose appeared to be to allow pornographic content to establish if they were likely to be within scope of Part 3 duties.
- 3.3 Ofcom initially reviewed the Youngtek Solutions Websites on the following dates:
- a) TNAflix.com on 25 July 2025;
  - b) empflix.com on 2 September 2025; and
  - c) imagefap.com and moviefap.com on 3 September 2025.
- 3.4 On each of these dates, Ofcom identified concerns that Youngtek Solutions had not implemented age assurance on the relevant services. The initial user mapping journeys conducted for Youngtek Solutions Websites are provided at **Annex 1** to this Confirmation Decision.<sup>43</sup>
- 3.5 Ofcom also conducted additional reviews of the Youngtek Solutions Websites prior to and throughout the investigation. The user mapping journeys from these further reviews are provided at **Annex 2**.<sup>44</sup>

### Correspondence with Youngtek Solutions

- 3.6 Prior to the opening of this investigation, Ofcom engaged substantially with Youngtek Solutions between October 2024 and August 2025. Copies of this correspondence are provided in **Annexes 3 to 39**.
- 3.7 This correspondence included Ofcom making Youngtek Solutions aware on multiple occasions of the requirement to implement highly effective age assurance from 25 July 2025:

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<sup>42</sup> See the programme updates of 16 January and 24 July 2025: [Enforcement Programme to protect children from encountering pornographic content through the use of age assurance](#)

<sup>43</sup> As the service TNAflix.com had implemented age assurance at the time the investigation was opened on 10 September 2025, a full user mapping journey was not conducted for the site prior to investigation. This was compiled at a later date, on 3 October 2025, and contains a screen capture of the site without age assurance captured on 25 July 2025.

<sup>44</sup> In addition to the initial reviews of 25 July, 2 and 3 September 2025 evidenced in **Annex 1**, additional reviews were conducted between July and September 2025, as evidenced in **Annex 2**.

- On 23 and 27 October 2024, Ofcom wrote to Youngtek Solutions explaining that the Act would require providers of porn services to implement age assurance.
  - On 16 January 2025, Ofcom provided Youngtek Solutions with links to its [Part 3 Guidance on Highly Effective Age Assurance](#).
  - On 24 April 2025, Ofcom sent an email to Youngtek Solutions, requesting information about the age assurance measures it intended to implement to comply with its duties under section 12 of the Act to prevent children from encountering pornographic content on its services by the deadline of 25 July 2025.
  - On 24 and 25 June 2025, Ofcom reiterated the requirement to implement highly effective age assurance to Youngtek Solutions.
  - On 27 June 2025, Ofcom received an email from Youngtek Solutions via '[redacted]@tnaflix.com' requesting a written response to queries it had about the legal basis for the requirement to implement highly effective age assurance on TNAflix.com. On 18 July 2025, Ofcom responded and explained what constitutes a "user-to-user service", what "having links to the UK" means, and that the duty to implement highly effective age assurance applies to all user-to-user services that allow pornographic content. Ofcom also explained in this correspondence that it had not established whether Youngtek Solutions operated services other than TNAflix.com, but that, if it did, the information may also be relevant to those services. See **Annexes 33 to 35** for copies of this correspondence.
- 3.8 On 25 July 2025, Ofcom reviewed the service TNAflix.com and identified concerns that it had not implemented age verification or age estimation on this service.
- 3.9 On 28 July 2025, Youngtek Solutions informed Ofcom that it was not possible for it to comply with the duties to implement highly effective age assurance due to technical and legal limitations within its jurisdiction. It also set out its position that UK Internet Service Providers ('ISPs') would be in a "better position" to verify the age of its users.
- 3.10 On 30 July 2025, Ofcom responded to Youngtek Solutions advising it that it is not the responsibility of ISPs to introduce highly effective age assurance or restrict access to services, and it that it is a service provider's responsibility to comply with the requirements of the Act.
- 3.11 On 31 July 2025, Youngtek Solutions responded to Ofcom requesting that it issue a notification to UK-based ISPs making them aware that TNAflix.com is an "adult-only service"; that it withdrew its consent for UK users to access it where this would contravene the Act; and that such providers should take steps to restrict access to TNAflix.com or ensure users meet the "statutory age-assurance requirements before routing traffic to [its] service".
- 3.12 On 31 July 2025, Ofcom reviewed the service TNAflix.com and first observed that it had implemented an age assurance solution which appeared to be capable of being highly effective.<sup>45</sup> Ofcom also observed that a pop-up box which stated "Stay private with VP.net" appeared on the homepage prior to being required to complete age verification or estimation. This appeared to be encouraging users to use a VPN to circumvent the age assurance solution.

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<sup>45</sup> See Annex 2, p.2.

- 3.13 On 1 August 2025 Ofcom’s Supervision team contacted Youngtek Solutions to acknowledge that an age assurance solution appeared to have been implemented on TNAflix.com which appeared to be capable of being highly effective but noted that service providers should not direct or encourage UK users to circumvent the age assurance process. Copies of the correspondence dated between 28 July and 1 August 2025 can be found in **Annexes 36 to 39**. Following this correspondence, Youngtek Solutions removed the pop-up box that appeared on the homepage.
- 3.14 Following further research which identified additional sites as likely to be operated by Youngtek Solutions, Ofcom reviewed empflix.com on 2 September 2025, and imagefap.com and moviefap.com on 3 September 2025, and identified concerns that Youngtek Solutions had not implemented age verification or age estimation measures on these services.
- 3.15 On 10 September 2025, Ofcom wrote to Youngtek Solutions to confirm that it had opened an investigation into whether Youngtek Solutions had complied with its duties under section 12 of the Act, specifically the requirement to implement highly effective age assurance. See **Annexes 40 and 40a** for a copy of the case opening documents.
- 3.16 On the same day, Ofcom issued a statutory information Notice requiring Youngtek Solutions to provide specified information by 24 September 2025. See **Annex 40b** for a copy of the Notice.
- 3.17 Following Youngtek Solutions’ failure to respond to the Notice, Ofcom issued a final warning on 25 September 2025 stating that Youngtek Solutions had failed to meet the deadline of 24 September 2025. Ofcom provided a deadline of 30 September 2025, explaining that a failure to provide the information by that deadline would result in Ofcom considering whether to expand the scope of the investigation to include Youngtek Solutions’ compliance with its duty to act in accordance with the requirements of the Notice. See **Annexes 41 and 41a** for copies of the final warning correspondence.
- 3.18 On the same day, Youngtek Solutions acknowledged receipt of Ofcom’s correspondence, and stated that it would provide the requested information by 30 September 2025. It also reiterated its position that it should be the responsibility of ISPs to ensure access controls for underage users is restricted, rather than the provider itself. See **Annex 42** for a copy of this correspondence.
- 3.19 Ofcom responded on 26 September 2025 confirming receipt of Youngtek Solutions’ email, stating that it looked forward to receiving the information by the deadline of 30 September 2025 to respond to the statutory information Notice. See **Annex 44** for a copy of this correspondence.
- 3.20 Following Youngtek Solutions’ failure to respond by the deadline, Ofcom expanded the scope of the investigation on 10 October 2025 to include a potential breach of section 102(8) of the Act. See **Annexes 45 and 45a** for a copy of the scope expansion correspondence.
- 3.21 On the same day, Youngtek Solutions responded objecting to Ofcom’s request for information relating to Youngtek Solutions’ Qualifying Worldwide Revenue (‘QWR’) and stating that it had implemented age assurance measures. Youngtek Solutions also reiterated its position on UK ISPs and provided information about its relationship with UK users. See **Annex 46** for a copy of this correspondence.
- 3.22 In response, on 30 October 2025, Ofcom wrote to Youngtek Solutions clarifying that responsibility for preventing children from encountering pornographic content rests with

the online service provider under Section 12 of the Act. Ofcom reminded Youngtek Solutions of the legal requirement to provide the information requested in the Notice and that the investigation was ongoing. A copy of this correspondence can be found at **Annexes 48 and 48a**.

- 3.23 On 20 January 2026, Ofcom issued a further statutory information Notice requiring Youngtek Solutions to provide a copy of the written record of their first CAA for each of the services it operates. Youngtek Solutions was required to provide this information by 27 January 2026. See **Annex 49a** for a copy of the Notice.
- 3.24 Ofcom did not receive a response to the Notice by 27 January 2026, and so, on 28 January 2026 Ofcom issued a final warning. See **Annexes 50 and 50a** for copies of the final warning correspondence.
- 3.25 On 28 January 2026 Youngtek Solutions provided a copy of the written record of their first CAA for each of the Youngtek Solutions Websites. Each CAA stated that the Youngtek Solutions Websites are “not intended for children, [are] not marketed to children, and [are] designed and branded solely for adult users”. Each CAA provided to Ofcom also set out the respective “age assurance measures” implemented on each service and concluded that “while attempted access cannot be ruled out in theory, the service is not likely to be accessed by children in practice due to the safeguards in place”. See **Annexes 51a to 51d** for copies of the CAAs.

### Provisional Decision on sections 12 and 102(8)

- 3.26 On 11 February 2026, Ofcom issued a Provisional Decision to Youngtek Solutions via email in which we set out our provisional findings that Youngtek Solutions had failed to implement highly effective age assurance to prevent children from encountering pornographic content and had failed, and was continuing to fail, to comply with the duty set out within section 102(8)(a) of the Act in respect of the Notice.
- 3.27 In the Provisional Decision, we informed Youngtek Solutions that it had until 5pm on 11 March 2026 to make written representations to Ofcom about the matters set out in the Provisional Decision and to inform Ofcom if it would also like to make oral representations.
- 3.28 Following the issuing of the Provisional Decision, on 2 March 2026, Youngtek Solutions provided the requested information required under Ofcom’s statutory Information Notice.
- 3.29 Ofcom’s Provisional Decision stated that Youngtek Solutions operated the websites empflix.com, imagefap.com, moviefap.com, pornrepublic.com and TNAflix.com. Ofcom provisionally concluded that during the Relevant Period, each of the Youngtek Solutions Websites failed to implement age assurance measures. Ofcom has decided not to pursue a potential breach in relation to pornrepublic.com, and so Ofcom’s Confirmation Decision relates only to empflix.com, imagefap.com, moviefap.com and TNAflix.com.

### Representations made by Youngtek Solutions

- 3.30 On 2 March 2026, Ofcom received written representations from Youngtek Solutions. See **Annexes 52 and 52a** for copies of the correspondence and representations. Youngtek Solutions’ representations stated that it had sought to proactively align with the objectives of the Act, and to implement age assurance measures in good faith.
- 3.31 Youngtek Solutions submitted that “age protection infrastructure was implemented across [its] network from the first day the Act became effective”, and that it implemented and

tested age assurance measures on its principal platform, TNAflix.com, on 25 July 2025, the date that the requirement became effective. Youngtek Solutions said that it treated implementation on TNAflix.com as the highest priority and implemented age assurance there first, and that this undermined any suggestion that there was a monetary motive to delay implementation. The provider noted that Ofcom stated in its Provisional Decision that it had accessed the service on 25 July 2025 and identified concerns that it had not implemented age verification or age estimation. Youngtek Solutions said that “any apparent discrepancy was most likely caused by deployment propagation that is internally controlled and caching mechanisms outside Youngtek’s direct control (for example, edge caching, ISP/telco routing, or other network-specific delivery variance)”. Youngtek Solutions said that these are recognised operational realities for large services and that they can cause users to see different versions temporarily depending on network path and cache state. It submitted that it was plausible that if Ofcom had accessed the service later on that date, that age verification would have been observed. Youngtek Solutions said that any compliance gap on TNAflix.com in July 2025 only lasted hours, rather than days, as per Ofcom’s account. Youngtek Solutions added that the period between 25 and 31 July 2025 included a weekend, and that a later observation date on Ofcom’s part did not necessarily mean that age assurance was absent on 25 July 2025.

- 3.32 In regard to the other services operated by Youngtek Solutions (in addition to TNAflix.com), it stated that they “experienced short-term technical synchronisation issues” during the deployment of age assurance, and that the inconsistencies observed lasted days, and in certain instances weeks. Youngtek Solutions said that it had not deliberately delayed compliance, and that the issues arose during the early stages of implementation where “technical standards and compliance expectations were still being operationalised across the industry”.
- 3.33 Youngtek Solutions stated that there was an absence of both intent and harm, which it said “proportional regulatory enforcement” should consider. It said that, to its knowledge, there was no evidence of demonstrable harm or of minors accessing content on its service due to the “temporary synchronisation issue”. The provider also noted that there was no prior enforcement history in relation to its compliance with age assurance requirements, and no pattern of prior non-compliance which would indicate a repeated or systemic failure.
- 3.34 Youngtek Solutions further stated that, prior to, and during the relevant period, it was required to manage concurrent information requests regarding age assurance and categorisation, which was burdensome for a small organisation. It said that this caused operational confusion, as the separate processes were communicated using similar statutory framing, particularly the repeated use of information notices under section 100 of the Act. Youngtek Solutions said, “overlapping themes across different threads created a genuine risk of misunderstanding which requests were directed at categorisation assessment versus which requests were directed at pornography age assurance implementation, and whether particular obligations were being applied to a single service or across multiple services”. The provider submitted that this context was relevant to mitigation and proportionality. Youngtek Solutions said that despite the complexity of multiple processes, it prioritised implementing age assurance on TNAflix.com, and proceeded to implement age assurance on its other services too.
- 3.35 Youngtek Solutions said that once it became aware of the synchronisation inconsistencies, it acted promptly and had since:

“Fully synchronised and QA enhanced age verification modules across all domains; implemented automated deployment validation systems; introduced real-time compliance monitoring alerts; assigned dedicated compliance oversight responsibility; established structured compliance checkpoints; enhanced internal reporting and documentation procedures”.

It further added that since September 2025, its services had experienced a reduction in implementation errors and had embedded enhanced monitoring to ensure ongoing alignment with Ofcom’s expectations. Youngtek Solutions said that it could provide evidence in the form of screenshots, logs and vendor confirmations.

- 3.36 In regard to its links with the United Kingdom, the provider submitted that neither Youngtek Solutions nor its affiliates have offices in the UK; does not employ any UK-based personnel; does not utilise UK service providers; does not purchase services from UK entities; and does not conduct UK-targeted marketing. It added that it receives less than 5% of total global traffic from UK users, and its UK-derived revenue is [§]. Youngtek Solutions said that any access from UK users was incidental, and there is no direct contractual relationship with UK users or advertisers. The provider also said that it was incorrect for Ofcom to state that it targeted UK users on its services solely based on content labels or categories, which it submitted are for content description and navigation, rather than market targeting. By way of an example, the provider said that TNAflix.com has a category titled “Japanese”, but this does not imply that it is targeting Japan. Youngtek Solutions said that the language options offered – US English as opposed to UK English – undermine any suggestion of targeting UK users.
- 3.37 Youngtek Solutions said that it had engaged with Ofcom in a constructive, transparent and proactive manner, and sought to assist Ofcom’s understanding of the service, taking steps to implement age assurance and address any issues identified. The provider said that it had engaged with Ofcom in extensive correspondence, and responded substantively and in good faith to Ofcom’s requests for information and clarification. It added that it had reviewed a substantial number of materials and endeavoured to respond within reasonable timeframes. Youngtek Solutions said that it had taken practical, risk-reducing steps beyond age assurance, including identifying network operators through which UK-traffic access its services. It said it had contacted ISPs, informing them that the services were adult sites, and inviting them to apply filtering or blocking under their own policies and frameworks.
- 3.38 The provider addressed the announcement on imagefap.com, set out below in paragraph 3.104, and apologised for the incident, which it said did not reflect the policy, values, or instructions of Youngtek Solutions. Youngtek Solutions said that the individual responsible for the imagefap.com post is a US-based volunteer administrator, who was not aware that they should not direct or encourage UK users to circumvent the age assurance process. The provider said that upon discovery of the post on 15 September 2025 – the same day the post was last observed by Ofcom – it was removed and the administrator’s account was temporarily suspended until it confirmed they would not repeat conduct of this nature. Youngtek Solutions submitted that, given the fact it was the act of a volunteer, who acted without the knowledge or authorisation of Youngtek Solutions management, and that swift action was taken, it should not be treated as an aggravating factor of significant weight. The provider also noted that the post appeared on imagefap.com, a service which had significantly fewer UK users than TNAflix.com, and so any weight placed on this incident as an aggravating factor should be assessed in that context.

- 3.39 Youngtek Solutions also provided specific representations in regard to the provisional finding that it had failed to comply with Ofcom’s Information Notice. Within its representations, Youngtek Solutions provided its QWR for 2025 (as set out below in paragraph 4.38), and confirmed that the adult services it operates are: TNAflix.com, empflix.com, imagefap.com, moviefap.com, and pornrepublic.com. The provider said that the purpose of the information-gathering had now been fulfilled. Youngtek Solutions acknowledged that it had not responded to the Notice by the original deadline of 24 September 2025, nor the final warning deadline of 30 September 2025, and said that this was due to legitimate concerns it had with providing commercially sensitive information to Ofcom, some of which it considered was beyond the scope of Ofcom’s investigation. The provider also reiterated that it was simultaneously managing multiple Ofcom processes, which put significant strain on a small organisation.
- 3.40 On 4 March 2026, Ofcom confirmed receipt of the representations made by Youngtek Solutions.<sup>46</sup>

## B: Application of Part 3 Duties of the Act to Youngtek Solutions Ltd

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- 3.41 Youngtek Solutions is a limited company registered in Cyprus (company number HE220270).<sup>47</sup> Ofcom considers that Youngtek Solutions operates a number of “tube”<sup>48</sup> internet services which allow users to upload or share pornographic content, specifically videos and images, that can be encountered by other users of the service.
- 3.42 For the reasons set out below, Ofcom considers that these services meet the conditions set out in the Act and were therefore within scope of Part 3 of the Act during the Relevant Period (and remain in scope).

### Youngtek Solutions Ltd is the provider of the Youngtek Solutions Websites

- 3.43 Under section 226(2) of the Act, a provider is defined as the entity that has control over who can use the U2U part of a service. This includes control over whether users can register, upload content, or interact with other users.
- 3.44 Ofcom considers Youngtek Solutions to be the provider of the Youngtek Solutions Websites for the following reasons:
- a) Youngtek Solutions provided Ofcom with its first CAAs for each of the Youngtek Solutions Websites, where it referred to “Youngtek Solutions Ltd” as the “provider” of each service.<sup>49</sup>
  - b) Youngtek Solutions confirmed it was the provider of each of the Youngtek Solutions Websites in its representations on Ofcom’s Provisional Decision.<sup>50</sup>

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<sup>46</sup> See **Annex 53**.

<sup>47</sup> See **Annex 54** for a copy of the search results from the Companies Section of the Department of Companies and Intellectual Property Cyprus.

<sup>48</sup> Tube services are video-sharing platforms specifically for adult content, typically offering free viewing with advertising.

<sup>49</sup> See **Annexes 51a to 51d**.

<sup>50</sup> See **Annex 52a**.

3.45 This evidence supports Ofcom’s determination that Youngtek Solutions exercises control over the user-to-user functionality of the Youngtek Solutions Websites and is therefore the provider of the service within the meaning of section 226(2) of the Act.

### The Youngtek Solutions Websites are each user-to-user services

3.46 Ofcom has determined that each of the Youngtek Solutions Websites is a regulated user-to-user service within the meaning of section 4(2) of the Act. Specifically, Ofcom’s review found that each of the Youngtek Solutions Websites is an internet service that includes functionalities that enable users to generate, upload, or share "content"<sup>51</sup> that can then be "encountered" (e.g. read or viewed) by other users of the service. This is demonstrated by the following:

- a) The Terms of Service for each of the Youngtek Solutions Websites include statements that the service “allows its users to submit video or other material and the hosting, sharing, and/or publishing of such submissions. You shall be solely responsible for your own submissions and the consequences of posting or publishing them” (**Annexes 55, 58, 62 and 64**).
- b) In addition, as evidenced on the relevant pages of **Annex 1**:
  - empflix.com (p.4); imagefap.com (p.10); moviefap.com (p.17); and TNAflix.com (p.24) each have an “upload” button on their landing pages.
  - imagefap.com (p.11) highlights “the latest porn videos uploaded by our members” and contains an “upload photos” button on the landing page.
  - moviefap.com (p.17) highlights “recent uploads” at the top of the landing page.

3.47 Further, Youngtek Solutions referred to each of the Youngtek Solutions Websites as “user-to-user content platform[s]” in the CAAs it provided to Ofcom.<sup>52</sup> In addition, Youngtek Solutions did not provide any representations on the information Ofcom presented in its Provisional Decision with regard to Ofcom’s provisional view that each of the Youngtek Solutions Websites are regulated user-to-user services.

3.48 Ofcom does not consider that any of the Youngtek Solutions Websites are an exempt service as provided for by Schedule 1 of the Act,<sup>53</sup> nor is it a service of a kind described in Schedule 2.<sup>54</sup>

### The Youngtek Solutions Websites allow (user-generated) pornographic content

3.49 Paragraph 2.16 of this Confirmation Decision explains how “pornographic content” is defined in the Act and paragraph 2.5 explains what “user-generated content” means.

3.50 The terms and conditions of each of the Youngtek Solutions Websites confirm that user-generated content is permitted, and that the sites did not prohibit pornographic content for all users during the Relevant Period. A provider must use highly effective age assurance to

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<sup>51</sup> Section 236(1) of the Act: “content” is defined as anything communicated by means of an internet service, whether publicly or privately, including written material or messages, oral communications, photographs, videos, visual images, music and data of any description.

<sup>52</sup> See **Annexes 51a to 51d**.

<sup>53</sup> Schedule 1 states that a Part 3 service is exempt if the conditions in paragraph 7(2) of Schedule 1 (internal business service conditions) are met in relation to that part.

<sup>54</sup> Services combining user-generated content or search content not regulated by the Act with pornographic content that is regulated.

prevent children from accessing primary priority content unless its terms of service prohibit such content (including pornographic content) for all users.<sup>55</sup>

- 3.51 As set out in section C, Ofcom’s review found that the content on Youngtek Solutions Websites is frequently referenced as being pornographic or tagged or otherwise categorised using sexually explicit terms.<sup>56</sup>
- 3.52 In addition, Youngtek Solutions confirmed to Ofcom in its submitted CAAs that each of the Youngtek Solutions Websites “hosts and displays pornographic content within the meaning of the Online Safety Act 2023”.<sup>57</sup>
- 3.53 In summary, the Youngtek Solutions Websites are operated as dedicated pornographic services and the content on the websites is primarily pornographic. Based on the nature of the user-generated content encountered on the service, Ofcom has determined that such content was produced solely or principally for the purpose of sexual arousal and therefore meets the definition of pornographic content under the Act.

### The Youngtek Solutions Websites have “links with the United Kingdom”

- 3.54 Each of the Youngtek Solutions Websites is in scope of the Act and has “links with the UK” because one or more of the following applies:
- it has a significant number of UK users; and/or
  - UK users form one of its target markets; and/or
  - the service is capable of being used by users in the UK and there are reasonable grounds to believe that there is a material risk of significant harm to individuals in the UK presented by user-generated content present on the service.

#### Significant number of UK users

- 3.55 The Act does not define a “significant number” of UK users for the purposes of considering whether a service has “links with the UK”. Ofcom considers this on a case-by-case basis, taking into account the nature and context of the service.
- 3.56 Ofcom considers “significant number of UK users” to mean UK user numbers that are material in the context of the service, rather than necessarily large or substantial. Providers should therefore err on the side of caution when assessing whether they have a significant number of UK users. A user does not need to be registered to count, but persons acting in the course of the provider’s business should be excluded. Providers should be able to distinguish these categories when determining whether there is a significant number of UK users.
- 3.57 The number of UK unique monthly users for the Youngtek Solutions Websites in July and August 2025 is included in the table below. This data has been provided by [redacted].<sup>58</sup> Ofcom notes that Youngtek Solutions did not provide any representations on the estimates of the

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<sup>55</sup> Section 12(4) and 12(5)(a) of the Act.

<sup>56</sup> See **Annex 1** for the full user mapping journey conducted for the Youngtek Solutions Websites, which evidences the examples listed in section C.

<sup>57</sup> See **Annexes 51a to 51d**.

<sup>58</sup> [redacted] estimated unique visitors to the websites via desktop or mobile browser. Data extracted 12 May 2026. All data made available by [redacted] is estimated based upon data obtained from third parties and is intended for informational purposes only.

number of UK unique monthly users, which were also included in Ofcom’s Provisional Decision.

**Table 1: UK unique monthly users**

Service	UK unique monthly users July 2025	UK unique monthly users August 2025
empflix.com	c.90,000-100,000	c.80,000-90,000
imagefap.com	c.300,000-350,000	c.250,000-300,000
moviefap.com	c.9,000-10,000	c.9,000-10,000
TNAflix.com	c.3.5 million-3.6 million	c.2.4 million-2.5 million

3.58 On this basis, Ofcom finds that the Youngtek Solutions Websites have monthly UK unique user numbers that are significant within the meaning of section 4(5)(a) of the Act.

**UK users form one of the “target markets” of imagefap.com and moviefap.com**

3.59 The Act does not define what constitutes a “target market”. Ofcom’s Overview of Regulated Services Statement<sup>59</sup> sets out a number of factors which could indicate that the UK is a target market, such as the way a service is designed, promoted, or how it receives revenue.

3.60 From its reviews, Ofcom identified an announcement published on imagefap.com that was targeted towards UK users and/or indicated that the UK is a target market of both imagefap.com and moviefap.com. The “announcement” on imagefap.com titled “Moviefap – Age Registration Nonsense” posted by a “site admin” referred to a “new UK law which says you need to verify your age to porn sites” and advised users that they could “use a VPN” should they “prefer to not give out [their] name or anything else to verify [their] age” (**Annex 2, p.19**). The announcement went on to say “What about imagefap? My crystal ball says bad days are coming. You will have to do the same thing – a VPN. And that ‘should’ some [sic] no later than September 28<sup>th</sup>”. A later comment made by the same “site admin” within the post also referred to “UK users” (**Annex 2, p.26**).

3.61 Ofcom considers the announcement regarding the Act was directed at UK users, and finds that for imagefap.com and moviefap.com, the UK formed one of the target markets during the Relevant Period, for the purposes of section 4(5)(b) of the Act.

3.62 Ofcom took into account Youngtek Solutions’ representations (summarised at paragraph 3.36 above) that it did not consider it was accurate to find that it targeted UK users based on content labels or categories. We also took into account Youngtek Solutions’ representations that it does not conduct UK-targeted marketing and has no relationship with UK advertisers. Having considered all the evidence, Ofcom no longer relies on UK-specific categories or UK-targeted advertising for the purposes of this Confirmation Decision. Ofcom does, however, consider that the announcement referred to above demonstrates that UK users were targeted on imagefap.com and moviefap.com. On the basis of that evidence, and applying a case-by-case assessment, Ofcom finds that, in addition, or in the alternative, that the UK was a target market for imagefap.com and moviefap.com during the Relevant Period for the purposes of section 4(5)(b) of the Act.

<sup>59</sup> [Overview of regulated services](#), published 16 December 2024.

**The Youngtek Solutions Websites are capable of being used by users in the UK and there are reasonable grounds to believe that there is a material risk of significant harm to individuals in the UK presented by user-generated content present on the services**

- 3.63 In addition, or in the alternative, Ofcom also considers there are reasonable grounds to believe that the Youngtek Solutions Websites were capable of being accessed by UK users<sup>60</sup> and presented a material risk of significant harm to individuals in the UK, specifically UK child users, due to the user-generated content present on each service.
- 3.64 The Act requires providers to implement age assurance to prevent children of any age from encountering primary priority content because such content is considered particularly harmful to children. Ofcom’s Children’s Register of Risks<sup>61</sup> sets out some of the harmful impacts that encountering pornographic content can have on children.
- 3.65 During the Relevant Period, each of the Youngtek Solutions Websites was capable of being used by users in the UK<sup>62</sup> and, for varying periods, did not implement any form of age assurance to ensure that such users were not children. As a result, there was a material risk that UK children could have experienced significant harm from encountering pornographic content on the Youngtek Solutions Websites.

**Application of the Section 12 duties to the Youngtek Solutions Websites**

- 3.66 Section 12 of the Act applies to regulated user-to-user services that are “likely to be accessed by children”. Under sections 37(4) and 37(5), where a provider has not completed and recorded the first Children’s Access Assessment (“CAA”) for a service by the statutory deadline of 16 April 2025, that service must be treated as “likely to be accessed by children” until the first CAA for each service is completed.
- 3.67 On 28 January 2026, in response to Ofcom’s Information Notice dated 20 January 2026, Youngtek Solutions provided Ofcom with its first CAAs for each of the Youngtek Solutions Websites. The CAAs, dated ‘2025’ and described as ‘formalised following Ofcom engagement’, outline the age assurance measures implemented on each service between 25 July and 22 September 2025 and concluded that “the service is not likely to be accessed by children in practice due to the safeguards in place”, including the age assurance measures. (See **Annexes 51a to 51d**).
- 3.68 Ofcom therefore concludes that the Section 12 duties applied to each of the Youngtek Solutions Websites from 25 July 2025 until at least the date on which age assurance measures were implemented on each service.<sup>63</sup> This is because the CAAs rely on those measures to show that the services are “not likely to be accessed by children”, so we assume that each CAA could only have been completed on or after the point those age assurance measures were in place. Until that point, each service must be treated as “likely to be accessed by children”, and therefore subject to Section 12 duties.

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<sup>60</sup> Ofcom’s reviews demonstrated that empflix.com, imagefap.com, moviefap.com and TNAflix.com were each freely accessible on the open web from a UK IP address.

<sup>61</sup> See Ofcom’s [Children’s Register of Risks](#), published 24 April 2025, particularly the ‘impacts’ section, pp.38-41.

<sup>62</sup> Ofcom’s review demonstrated that the Youngtek Solutions Websites were freely accessible on the open web from a UK IP address.

<sup>63</sup> Ofcom last observed the Youngtek Solutions Websites without age assurance measures on the following dates: TNAflix.com on 25 July 2025; empflix.com and moviefap.com on 9 September 2025, and; imagefap.com on 22 September 2025.

3.69 Ofcom has not assessed, and makes no findings on, whether these CAAs comply with the requirements of section 36 of the Act.

## C: Youngtek Solutions' compliance with its duties under Part 3, section 12 of the Act

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- 3.70 For the following reasons, and having carefully considered Youngtek Solutions' representations, Ofcom has determined that there are reasonable grounds to believe that Youngtek Solutions failed to comply with the duty set out within section 12 of the Act to implement highly effective age assurance to prevent children from encountering pornographic content on each of the Youngtek Solutions Websites.
- 3.71 In making this determination, Ofcom has had regard to the relevant measures in the Codes of Practice<sup>64</sup> (including measures B2 and B4).<sup>65</sup>
- 3.72 Ofcom makes this finding in respect of the period from 25 July 2025 to 22 September 2025 (the Relevant Period). The duration of non-compliance differed between the services, as set out below in the sub-section titled "The Youngtek Solutions Websites did not use highly effective age verification or age estimation to identify children and prevent them from encountering pornographic content".

### Pornographic content was available on the Youngtek Solutions Websites

#### Content warning – explicit descriptions of sexual activity included in this section

- 3.73 As noted at paragraphs 3.49-3.53 of this Confirmation Decision, Ofcom's review of the Youngtek Solutions Websites found that each of the services are marketed and operated as dedicated pornographic services. In particular, our review of the Youngtek Solutions Websites between 25 July and 3 September 2025 showed that pornographic content was available on the services on the respective dates the reviews were completed.
- 3.74 A summary of Ofcom's findings is set out in the rest of this section. Please see the full user mapping journey for the Youngtek Solutions Websites at **Annex 1**.

#### empflix.com

- 3.75 On immediate access of empflix.com, the user is presented with a home page titled "Featured Porn Videos" with video thumbnails visible, many of which contain explicit sexual activity. (**Annex 1, p.4**).
- 3.76 The titles of multiple videos reference pornographic content, such as "[X]" and "[X]". (**Annex 1, p.4**).
- 3.77 Down the left-hand side of the home page, the user can see a list of categories. Multiple categories indicate the presence of pornographic content, such as "[X]" and "Cartoon Sex". (**Annex 1, p4**).

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<sup>64</sup> [Protection of Children Code of Practice for user-to-user services](#)

<sup>65</sup> It is not necessary to determine which measure applies in this case. Regardless of whether a service has a principal purpose of disseminating pornographic content, section 12 of the Act requires providers of services that are likely to be accessed by children and that allow such content to implement highly effective age assurance.

### **imagefap.com**

- 3.78 On immediate access of imagefap.com, the user is presented with a home page titled “Free Porn Pics on the biggest adult hoster, ImageFap.com”, a number of which contain explicit sexual images. **(Annex 1, p.10).**
- 3.79 At the top of the homepage, there is an option to click “Live Sex”. **(Annex 1, p.10).**
- 3.80 The homepage also contains a section titled “The latest porn videos uploaded by our members”, many of which contain explicit sexual activity. **(Annex 1, p.11).**
- 3.81 Down the left-hand side of the home page, the user can see a list of categories. Multiple categories indicate the presence of pornographic content, such as “Amateur porn” and “[X]”. **(Annex 1, p.10).**

### **moviefap.com**

- 3.82 On immediate access of moviefap.com, the user is presented with a home page where multiple videos reference pornographic content, such as “[X]” and “[X]”. The video thumbnails are visible, many of which contain explicit sexual activity **(Annex 1, p.17-18).**
- 3.83 Text at the bottom of the homepage indicates the presence of pornographic content “MovieFap lets you watch new porn videos every day”. **(Annex 1, p.19).**

### **TNAflix.com**

- 3.84 On immediate access of TNAflix.com, the user is presented with a home page titled “Featured Porn videos” with video thumbnails visible, many of which contain explicit sexual activity. **(Annex 1, p.24).**
- 3.85 The titles of multiple videos reference pornographic content, such as “[X]” and “[X]”. **(Annex 1, p.24).**
- 3.86 Down the left-hand side of the home page, the user can see a list of categories. Multiple categories indicate the presence of pornographic content, such as “Amateur porn” and “[X]”. **(Annex 1, p.24).**

### **Final determinations**

- 3.87 For each of the Youngtek Solutions Websites, the user-generated content that is allowed and can be encountered by other users of the service is sexually explicit and constitutes pornographic content, in that the content is of such a nature that it is reasonable to assume that it was produced solely or principally for the purpose of sexual arousal.<sup>66</sup>
- 3.88 For these reasons, Ofcom has determined that pornographic content was available on each of the Youngtek Solutions Websites during the Relevant Period.

### **The Youngtek Solutions Websites did not use highly effective age verification or age estimation to identify children and prevent them from encountering pornographic content**

- 3.89 To comply with section 12(3)(a) of the Act, providers of Part 3 services that allow pornographic content, and are likely to be accessed by children, must use age verification or age estimation (or both) to ensure that children are prevented from encountering user-generated pornographic content on its services. The age verification or age estimation used

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<sup>66</sup> Section 236.

must be of such a kind, and used in such a way, that it is highly effective at correctly determining whether or not a particular user is a child.

- 3.90 As set out at paragraphs 3.7-3.13, Ofcom’s Guidance<sup>67</sup> sets out the kinds of age verification or age estimation that may be capable of being highly effective at determining whether or not a particular user is a child. The Guidance states that general contractual restrictions, including conditions in the terms of service prohibiting users who are over 18, general disclaimers that users should be over 18, and warnings on specific content that the content is only suitable for over 18s, are not capable of being highly effective if used in isolation.
- 3.91 Ofcom’s user journey reviews of the Youngtek Solutions Websites between 25 July and 3 September 2025<sup>68</sup> demonstrated that, on the respective dates the reviews were completed, our reviewers were not required to complete any form of age verification or age estimation on the Youngtek Solutions Websites.

**Table 2: Duration of non-compliance for the Youngtek Solutions Websites**

Service	Date Ofcom last observed service without an age assurance method	Date Ofcom first observed service with age assurance	Duration of non-compliance
empflix.com	9 September 2025 <sup>69</sup>	11 September 2025 <sup>70</sup>	25 July to 9 September 2025
imagefap.com	22 September 2025 <sup>71</sup>	29 September 2025 <sup>72</sup>	25 July to 22 September 2025
moviefap.com	9 September 2025 <sup>73</sup>	11 September 2025 <sup>74</sup>	25 July to 9 September 2025
TNAflix.com	25 July 2025 <sup>75</sup>	31 July 2025 <sup>76</sup>	25 July 2025

### **empflix.com**

- 3.92 Explicit pornographic content was displayed on immediate access to empflix.com with no age verification or age estimation method in place. Reference to age-related access was found only in the empflix.com terms of service: “By accessing the EMPFlix, you certify that you are at least 18 years of age” (**Annex 55**). Ofcom does not regard such statements as sufficient to meet the duties under section 12 of the Act.

<sup>67</sup> [Guidance on highly effective age assurance for part 3 services](#), published 24 April 2025.

<sup>68</sup> See **Annex 1** for the full user mapping journey conducted for the Youngtek Solutions Websites.

<sup>69</sup> See **Annex 2, p.4**.

<sup>70</sup> See **Annex 2, p.15-16**.

<sup>71</sup> See **Annex 2, p.28-29**.

<sup>72</sup> See **Annex 2, p.31-32**.

<sup>73</sup> See **Annex 2, p.8**.

<sup>74</sup> See **Annex 2, p.20-21**.

<sup>75</sup> See **Annex 1, p.24**.

<sup>76</sup> See **Annex 2, p.2**.

- 3.93 We note that Youngtek Solutions implemented an age assurance method on empflix.com which appeared to be capable of being highly effective within the meaning of the Act between 9 and 11 September 2025. As set out in Table 2 above Ofcom considers that the period of non-compliance ran from 25 July 2025, when the duties in section 12 of the Act first applied, until 9 September 2025, which was the last date on which Ofcom observed empflix.com operating without any form of age assurance. Ofcom is satisfied that empflix.com was active during July and August 2025 given the UK unique monthly user numbers set out in Table 1 above and so considers it appropriate to determine the period of non-compliance as starting from the date the duties first applied.
- 3.94 In its representations on the Provisional Decision, Youngtek Solutions stated that it had implemented an “age protection infrastructure” across its network from the date the age assurance requirements came into effect. However, it did not specify the date it introduced age assurance on empflix.com. The provider said that the service, and the other services excluding TNAflix.com, “experienced short-term technical synchronisation issues” during the deployment of age assurance. Ofcom acknowledges that it is possible empflix.com may have experienced technical issues, however, we note that Youngtek Solutions has not provided a detailed account or any evidence of such issues in order for Ofcom to consider them further. Ofcom notes that Youngtek Solutions did not provide any evidence which suggested it had implemented age assurance on empflix.com prior to 9 September 2025, and that regardless of the reason for the services presenting to users as having no age assurance, by Youngtek Solutions’ own account, the application of the age assurance was inconsistent.
- 3.95 On the dates Ofcom’s reviewers conducted checks on empflix.com (2 and 9 September 2025) and observed it without any form of age assurance, the website was accessed via the open web from a UK IP address, using a typical web browser, in this instance Microsoft Edge. Ofcom considers each instance one of Ofcom’s reviewers accessed empflix.com represented the typical user journey any UK users might have faced at the time. Taking all this into account, Ofcom concludes that the period of non-compliance ran from 25 July 2025 until 9 September 2025.

#### **imagefap.com**

- 3.96 Explicit pornographic content was displayed on immediate access to imagefap.com with no age verification or age estimation method in place. Reference to age-related access was found only in the imagefap.com terms of service: “By accessing the Imagefap website, you certify that you are at least 18 years of age” (**Annex 58**). Ofcom does not regard this statement as sufficient to meet the duties under section 12 of the Act.
- 3.97 We note that Youngtek Solutions implemented an age assurance method on imagefap.com which appeared to be capable of being highly effective within the meaning of the Act between 22 and 29 September 2025. As set out in Table 2 above, Ofcom considers that the period of non-compliance ran from 25 July 2025 until 22 September 2025, which was the last date on which Ofcom observed imagefap.com operating without any form of age assurance. Ofcom is satisfied that imagefap.com was active during July and August 2025 given the UK unique monthly user numbers set out in Table 1 above and so considers it appropriate to determine the period of non-compliance as starting from the date the duties first applied.
- 3.98 Youngtek Solutions representations are set out above at paragraph 3.94. As with empflix.com the provider did not specify the date it introduced age assurance on

imagefap.com, nor did it provide any evidence which suggested it had implemented age assurance on imagefap.com prior to 22 September 2025. Ofcom notes that within the announcement post on imagefap.com published on 11 September 2025, which was primarily focused on the site moviefap.com, the administrator account said “What about imagefap? My crystal ball says bad days are coming. You will have to do the same thing – a VPN. And that ‘should’ some [sic] no later than September 28<sup>th</sup> Here is the thing! Lets say the age check ‘thing’ happens on the 28<sup>th</sup>. Unless you read this forum post... then you will be blocked if you are in the UK”<sup>77</sup>. Ofcom considers this undermines Youngtek Solutions’ position, set out in its representations, that it had implemented an “age protection infrastructure” across its network from the date the age assurance requirements came into effect, and that these services “experienced short-term technical synchronisation issues” during the deployment of age assurance. Instead, Ofcom considered this supported its position that Youngtek Solutions implemented an age assurance method on imagefap.com between 22 and 29 September 2025.

- 3.99 On the dates Ofcom’s reviewers conducted checks on imagefap.com (3, 9, 11, 12, 15, and 22 September 2025) and observed it without any form of age assurance, it was accessed the same way as empflix.com, as set out at paragraph 3.95. For the reasons set out in the same paragraph, and above in paragraph 3.98, Ofcom concludes that the period of non-compliance for imagefap.com ran from 25 July 2025 to 22 September 2025.

#### **moviefap.com**

- 3.100 Explicit pornographic content was displayed on immediate access to moviefap.com with no age verification or age estimation method in place. Reference to age-related access was found only in the moviefap.com terms of service: “By accessing the Moviefap website, you certify that you are at least 18 years of age” (**Annex 62**). As above, Ofcom does not regard this statement as sufficient to meet the duties under section 12 of the Act.
- 3.101 Youngtek Solutions implemented an age assurance method on moviefap.com which appeared to be capable of being highly effective within the meaning of the Act between 9 and 11 September 2025. As set out in Table 2 above, Ofcom considers that the period of non-compliance ran from 25 July 2025 until 9 September 2025, which was the last date on which Ofcom observed moviefap.com operating without any form of age assurance. Ofcom is satisfied that moviefap.com was active during July and August 2025 given the UK unique monthly user numbers set out in Table 1 above and so considers it appropriate to determine the period of non-compliance as starting from the date the duties first applied.
- 3.102 Youngtek Solutions representations are set out above at paragraph 3.94. As with empflix.com and imagefap.com, the provider did not specify the date it introduced age assurance on moviefap.com, nor did it provide any evidence which suggested it had implemented age assurance on moviefap.com prior to 9 September 2025.
- 3.103 On the dates Ofcom’s reviewers conducted checks on moviefap.com (3 and 9 September 2025) and observed it without any form of age assurance, it was accessed the same way as empflix.com, as set out at paragraph 3.95.
- 3.104 Ofcom noted that, after an age assurance method had been implemented on moviefap.com, but prior to age assurance being implemented on imagefap.com, an account referred to as a “Site Admin” posted an “announcement” on imagefap.com titled “Moviefap

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<sup>77</sup> See Annex 2, p.19.

– Age Registration Nonsense” with the timestamp of 12:43 on 11 September 2025. The post, that Ofcom captured evidence of on 11 and 15 September 2025, referred to the Act, and advised readers that they could “use a VPN” should they “prefer to not give out [their] name or anything else to verify [their] age”.<sup>78</sup> As set out at paragraph 3.13, Ofcom’s Supervision team had previously advised Youngtek Solutions that service providers should not direct or encourage UK user to circumvent the age assurance process.

- 3.105 Ofcom notes that within the announcement post on imagefap.com, which was primarily focused on the site moviefap.com, the administrator account said, “Starting today [11 September 2025] our sister website moviefap.com will show you a display telling you that you need to prove your age”. Ofcom considers this undermines Youngtek Solutions’ position, set out in its representations, that it had implemented an “age protection infrastructure” across its network from the date the age assurance requirements came into effect, and that these services “experienced short-term technical synchronisation issues” during the deployment of age assurance. Instead, Ofcom considered this supported its position that Youngtek Solutions implemented an age assurance method on moviefap.com between 9 and 11 September 2025. For this reason, and the reasons set out in paragraph 3.94, Ofcom concludes that the period of non-compliance for moviefap.com ran from 25 July 2025 to 9 September 2025.
- 3.106 In its representations on the Provisional Decision, as set out in paragraph 3.38, Youngtek Solutions said that the announcement had been posted by a volunteer administrator acting independently of its management, and that it did not reflect the policy, values, or instructions of Youngtek Solutions. It said that after it became aware of the announcement on 15 September 2025, it removed the post, and the administrator’s account was temporarily suspended.
- 3.107 On 6 March 2026, Ofcom accessed the announcements board on imagefap.com and observed that, contrary to Youngtek Solutions’ representations, the announcement previously titled “Moviefap – Age Registration Nonsense” had been renamed “Update – Age Registration Nonsense February 12” and remained on imagefap.com. See **Annex 66** for copies of the screenshots captured by Ofcom on 6 March 2026 which evidence the updated announcement. As evidenced on **Annex 66, pages 16-17**, the admin account responsible for the original announcement posted a further comment on 12 February 2026 within the same thread which explained that the “topic” would now be “locked” from any further comments, concluding “I will say it again, install a VPN in your browser. Anyone can do it in less that [sic] 30 seconds”.
- 3.108 As at the date of issuing this Confirmation Decision, the announcement is still visible on imagefap.com. Ofcom notes that Code measure PCU B1.4<sup>79</sup> recommends that “the provider should not publish content that directs or encourages United Kingdom users to circumvent the highly effective age assurance process, or content controls or access controls used in conjunction with it, on the service”. However, Ofcom has taken into account the fact that this does not appear in a prominent or user-facing position on the website, and UK users would need to go through age assurance before being able to view the announcement, or by specifically searching for the announcement using an internet search engine. In the specific circumstances of this case, while Ofcom considers that the content is inconsistent with the recommended practice set out in the Code, it does not consider that its presence

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<sup>78</sup> See **Annex 2, p.19 and 26**.

<sup>79</sup> [Protection of Children Code of Practice for user-to-user services](#), issued 4 July 2025.

materially undermines the effectiveness of the age assurance measures in place or gives rise to ongoing non-compliance with Youngtek Solutions' duties under section 12 of the Act. However, Ofcom considers both the publication of the announcement and Youngtek Solutions' failure to ensure its prompt and lasting removal to be aggravating factors, which are taken into account in the assessment of seriousness, harm and culpability, as set out in the penalty considerations below.

### **TNAflix.com**

- 3.109 Explicit pornographic content was displayed on TNAflix.com with no age verification or age estimation method in place on 25 July 2025. Reference to age-related access was found only in the TNAflix.com terms of service: "By accessing the TNAflix website, you certify that you are at least 18 years of age" (**Annex 64**). As above, Ofcom does not regard this statement as sufficient to meet the duties under section 12 of the Act.
- 3.110 Ofcom last observed the service without age assurance on 25 July 2025; Ofcom's reviewers conducted a check on TNAflix.com on 25 July at 16:12 BST, capturing evidence that demonstrated that there was no form of age assurance in place. This evidence was obtained when accessing TNAflix.com through Garrison, a secure web browser from a UK IP address. When Ofcom reviewed the service on 31 July 2025 at 13:59 BST, an age assurance mechanism capable of being highly effective within the meaning of the act was first observed in place on the service.
- 3.111 In its representations on the Provisional Decision, Youngtek Solutions stated that it had implemented age assurance on TNAflix.com on 25 July 2025, and that any discrepancies observed by Ofcom were likely caused by deployment propagation and caching mechanisms outside of its control. These explanations refer to the way in which updates to a service (such as the introduction of an age assurance measure) may not become visible to all users immediately, for example where different users are served content from cached or distributed versions of the service. It said that, as a result, it was possible that different users may have observed different versions of the service for a limited period, and that had Ofcom accessed the service again later on the same date, it was plausible that age assurance would have been observed.
- 3.112 Ofcom has considered the provider's position and acknowledges that, in principle, issues relating to deployment propagation and caching could give rise to temporary inconsistencies in how a service is presented to users. However, it notes that Youngtek Solutions has not provided a detailed account of the specific technical issues said to have occurred, nor any supporting evidence, such that Ofcom is able to assess whether such issues arose in this case or the extent to which they may have affected the user experience.
- 3.113 Ofcom further notes that Youngtek Solutions has not provided any evidence which demonstrates that age assurance was in place at the time Ofcom accessed the service on 25 July 2025 (for example timestamped screenshots showing age assurance in place on the service, or any other confirmation from the age assurance provider that the systems and processes were live).
- 3.114 Given Ofcom's contemporaneous evidence showing the absence of any age assurance on that date, Ofcom concludes that TNAflix.com did not have an age assurance method in place on 25 July 2025.
- 3.115 Ofcom also notes that correspondence from Youngtek Solutions dated 28 and 31 July 2025 referred to technical, legal or operational constraints in relation to the implementation of

age assurance on TNAflix.com, and included requests for alternative measures involving UK-based ISPs. On 28 July 2025, Youngtek Solutions stated that “compliance with the UK’s prescribed age verification mechanisms [was] not feasible”. On 31 July 2025, Youngtek Solutions requested that Ofcom issue a notification to UK-based ISPs regarding access to TNAflix.com. As set out in paragraph 3.10 above, Ofcom had previously clarified that responsibility for compliance with section 12 of the Act rests with the service provider.

- 3.116 Taking all the evidence into account, including Youngtek Solutions’ representations, Ofcom’s finding of non-compliance in respect of TNAflix.com is confined to 25 July 2025, being the date on which Ofcom observed the service operating without any form of age assurance. This represents a reduction in the period of non-compliance for TNAflix.com since the Provisional Decision. Ofcom has taken this reduced, single day period of non-compliance into account when determining the appropriate level of penalty, as set out at paragraph 4.21 below.

### Final determinations

- 3.117 Ofcom has determined that Youngtek Solutions was required to implement age assurance of a kind that is highly effective at determining whether or not a user is under the age of 18, prior to pornographic material being displayed to its users, from 25 July 2025.
- 3.118 Ofcom concludes that during the Relevant Period, each of the Youngtek Solutions Websites failed to implement age assurance measures. The duration of non-compliance differed between services, as set out in paragraphs 3.91 to 3.116 above.

## D: Youngtek Solutions Ltd’s compliance with section 102(8) of the Act

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### The Notice

- 3.119 As noted at paragraph 3.16, as part of its investigation, Ofcom issued a formal request for information to Youngtek Solutions on 10 September 2025 (**‘the Notice’**). The Notice sought information regarding Youngtek Solutions’ qualifying worldwide revenue (**‘QWR’**) and a complete list of all services – in addition to the Youngtek Solutions Websites – operated by Youngtek Solutions.
- 3.120 Ofcom sent the Notice on 10 September 2025 via email to the following email address(es): [redacted]@tnaflix.com; support@empflix.com; abuse@empflix.com; support@tnaflix.com; support@imagefap.com; dmca@moviefap.com.
- 3.121 Ofcom did not receive any delivery failure notifications. Ofcom received a ‘successful mail delivery report’ for the email addresses used to correspond with Youngtek Solutions, for each email sent to Youngtek Solutions. Please see **Annex 65** for a summary of the email address sources for those used to send the Notice to and their delivery status.
- 3.122 Ofcom had previously used the email address [redacted]@tnaflix.com to correspond with Youngtek Solutions, receiving a number of responses directly from [redacted]@tnaflix.com (**Annexes 14, 17, 21, 22, 24, 27, 29, 31, 33, 36 and 38**).
- 3.123 Therefore, Ofcom considers that serving the Notice through these email addresses enabled the Notice to come to the attention of Youngtek Solutions, as the provider of the Youngtek Solutions Websites, within the meaning of section 226 of the Act.

- 3.124 Ofcom also considers that service of the Notice on Youngtek Solutions was effective through these communications 48 hours after the Notice was issued to these email addresses, in accordance with section 208 of the Act.
- 3.125 As Ofcom did not receive a response to the Notice by the deadline of 24 September 2025, it sent a final warning letter to Youngtek Solutions, with a deadline of 30 September 2025. Youngtek Solutions confirmed on 25 September 2025 that it had received the Notice issued by Ofcom, and that it intended to respond to the Notice by the 30 September 2025 (**Annex 42**).
- 3.126 However, Ofcom did not receive a response by the deadline of 30 September 2025, and on 10 October 2025 Ofcom extended its investigation to consider whether Youngtek Solutions had failed to respond to a statutory information request.<sup>80</sup>
- 3.127 Ofcom informed Youngtek Solutions of the expansion of its investigation on 10 October 2025, and in response, Youngtek Solutions objected to Ofcom’s request for information relating to its QWR, explaining that it would not provide it, as the information was commercially sensitive and it considered Ofcom’s request to be disproportionate. Youngtek Solutions also did not provide a response to the request for a complete list of sites it operates.

### Youngtek Solutions Ltd has failed to comply with its duties under section 102(8)(a)

- 3.128 Youngtek Solutions was required to act in accordance with the requirements of the Notice by providing the requested information by 24 September 2025. Youngtek Solutions did not provide the information by that deadline. Ofcom acknowledged Youngtek Solutions’ explanation for why it objected to Ofcom’s request for information relating to its QWR, set out in its correspondence of 10 October 2025.
- 3.129 As set out in paragraphs 2.31-2.35 above, Section 100 empowers Ofcom to request any information required for the purpose of exercising, or deciding whether to exercise, its online safety functions, as long as the power is exercised in a way that is proportionate to the use to which the information is to be put in the exercise of Ofcom’s powers. This includes a power to require a person to obtain or generate information.<sup>81</sup> Under section 102(8)(a) of the Act, a person who received an information notice under section 100 of the Act has a duty to act in accordance with the requirements of the notice. This includes responding to the information notice by the deadline set out in the notice.
- 3.130 We acknowledge that a provider’s QWR is likely to be commercially sensitive. However, the power to request information extends to commercially sensitive information, and any such information provided would be subject to the protection of the statutory scheme.<sup>82</sup>
- 3.131 We do not accept Youngtek Solutions’ argument that requesting its QWR was disproportionate to the use for which the information was requested, which was for the purposes of calculating a penalty should Youngtek Solutions have failed to comply with its duties under the Act. As noted at paragraph 1.11 of our Penalty Guidelines,<sup>83</sup> the central

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<sup>80</sup> Annexes 45 and 45a.

<sup>81</sup> Section 100(2)(a) of the Act.

<sup>82</sup> See paragraphs 3.59 to 3.61 of our [Guidance for information gathering powers under the Online Safety Act 2023](#).

<sup>83</sup> [penalty-guidelines-september-2017.pdf](#)

objective of imposing a penalty is deterrence and Ofcom will have regard to the size and turnover of the regulated body when considering the deterrent effect of any penalty. In addition, Ofcom uses QWR to ensure that the penalty does not exceed the maximum penalty for the particular type of contravention as set out in paragraph 4 of Schedule 13 to the Act.

- 3.132 At the time of issuing the Provisional Decision, Youngtek Solutions had not provided a substantive response to the Notice. Youngtek Solutions subsequently provided the requested information in response to the Provisional Decision. However, this does not affect the fact that Youngtek Solutions did not meet the deadline of 24 September 2025 and only provided the information after the Provisional Decision was issued.
- 3.133 Having considered all the relevant evidence, including Youngtek Solutions' representations on the Provisional Decision, Ofcom determines that Youngtek Solutions failed to comply with the duty set out within section 102(8)(a) of the Act in respect of the Notice.

## **E: Confirmation Decision on Youngtek Solutions' compliance with section 12 and section 102(8) of the Act**

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### **Failure to comply with Section 12 of the Act**

- 3.134 From 25 July 2025, section 12 of the Act required Youngtek Solutions to implement age assurance that is highly effective at determining whether a user is a child, in order to prevent children from encountering pornographic content on its services.
- 3.135 Ofcom has determined that Youngtek Solutions failed to comply with this requirement. During the period from 25 July 2025 to 22 September 2025 (the '**Relevant Period**'), each of the Youngtek Solutions Websites failed to implement age assurance measures. The duration of non-compliance differed between the services, as set out in Section C.
- 3.136 As a result, children were not effectively prevented from encountering pornographic content on those services.

### **Failure to comply with Section 102(8) of the Act**

- 3.137 On 10 September 2025, Ofcom issued the Notice to Youngtek Solutions in connection with Ofcom's investigation, with a deadline of 24 September 2025, requiring Youngtek Solutions to provide information regarding its QWR and a complete list of all services operated by Youngtek Solutions. Youngtek Solutions did not provide the required information by the deadline, and the information was only provided after the Provisional Decision was issued.
- 3.138 Ofcom has determined that Youngtek Solutions has contravened its duty under section 102(8) of the Act to act in accordance with the requirements of the Notice issued under section 100 of the Act.

# 4. Remedy and Penalty

## Representations by Youngtek Solutions on remedy and penalty

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- 4.1 As noted in paragraphs 3.30 to 3.39 above, Youngtek Solutions made written representations on the Provisional Decision, which included submissions specifically on remedy and penalty.
- 4.2 Youngtek Solutions noted that Ofcom’s Provisional Decision referred to publicly available financial information from 2014. It said that these figures were not an appropriate proxy for present financial capacity or QWR, and reliance on such figures risked overstating Youngtek Solution’s current revenues and ability to pay a penalty.
- 4.3 The provider said that it was not solely an operator of adult services, and that not all of its business activities were relevant to the pornography services under investigation. Youngtek Solutions said that this was the principal reason it was cautious about providing consolidated corporate revenues, and that it did not consider it was proportionate to disclose commercial information which it considered irrelevant to the specific services under investigation.
- 4.4 In its representations, Youngtek Solutions provided information regarding its QWR, which is set out below in the section titled “the size and financial position of Youngtek Solutions”. The provider said that the current figures it had provided were the most reliable basis for proportionality and ability to pay.
- 4.5 Youngtek Solutions stated that it is the legal operator of the Youngtek Solutions Websites, and that it forms part of a broader corporate group structure in which related companies in other jurisdictions provide other services and functions, which operate cohesively in delivering and maintaining the relevant online services. The provider added that Youngtek Solutions itself does not directly collect advertising revenue or maintain independent operational banking facilities. The provider explained that when reference is made in its representations to Youngtek Solutions’ revenue, that this was in relation to the “consolidated operational group and the entities responsible for revenue collection and workforce management, not solely to Youngtek Solutions Limited as a standalone vehicle”.
- 4.6 In regard to the proposed penalties specifically, Youngtek Solutions submitted that they were disproportionate to the economic context. The provider said that the combined proposed penalties in regard to the provisional breach of section 12 and section 102(8) were roughly 50% of the total worldwide adult-service revenue generated by the Youngtek Solutions Websites. Youngtek Solutions added that its financial records showed that the services “operated at near break-even in 2025”, and so the proposed penalties would be existential and risk compelling providers to restrict access to its services in the UK and potentially exiting the market.
- 4.7 Youngtek Solutions stated that certain minor or legacy domains have minimal traffic and generated negligible revenue. It said therefore the penalty should reflect the real-world scale, duration, and impact, rather than treating all the domains as equal to the primary service, TNAflix.com.

- 4.8 The provider said that the proposed penalty represented more than 85 years of net profit based on its annual earnings in 2025, and approximately ten times the total UK revenue generated from all services in the UK. Youngtek Solutions also stated that if TNAflix.com was not included in the investigation, the proposed combined penalties would represent three times all revenue generated by the remaining four services.
- 4.9 Youngtek Solutions submitted that if a financial penalty is deemed appropriate, that it should sit at the lower end of the statutory range. It said that “a small fraction of UK revenue attributable to the relevant period or aligned to any realistic realized economic benefit would serve punitive, educative, and deterrent purposes proportional to the nature and duration of the issue”.
- 4.10 In regard to the proposed penalty in relation to the provisional breach of section 102(8), Youngtek Solutions considered that both the single and daily penalties should be withdrawn or substantially reduced. The provider said that it had now provided the information in relation to its complete list of services, and QWR, requested in Ofcom’s statutory information Notice issued on 10 September 2025. Youngtek Solutions said that, if Ofcom still considers it appropriate to impose a penalty for its delay in providing the requested information, the amount proposed by Ofcom was not proportionate to the nature and duration of the failure.
- 4.11 Ofcom considers it appropriate to impose penalties in relation to the failure to comply with sections 12 and 102(8). However, having taken into account all the relevant evidence, Ofcom has reduced the penalty initially proposed in the Provisional Decision in relation to section 12, however the penalty in relation to section 102(8) remains unchanged. We set this out in more detail below. Ofcom will not impose any remedy – such as a requirement to take steps to comply with the Notice – because Youngtek Solutions has provided the requested information following the Provisional Decision. Ofcom will also not impose any daily penalties given there is no continuing non-compliance.

## Penalty

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- 4.12 Under Section 132(5) of the Act, Ofcom can, in a Confirmation Decision, impose a single penalty amount covering the specified breaches.<sup>84</sup>
- 4.13 Section 143 of the Act and Schedule 13 to the Act set out the principles that apply when determining the amount of any penalties to be imposed upon a person. In particular, paragraph 2(4) of Schedule 13 to the Act requires that a penalty must be of an amount that Ofcom considers to be appropriate and proportionate to the failure (or failures) in respect of which it is imposed.
- 4.14 Paragraph 2(1) of Schedule 13 to the Act requires that in determining the amount of a penalty to be imposed on a person, Ofcom must take into account any representations made, and evidence provided, by the person, and the effects of the failure (or failures) in respect of which the penalty is imposed.<sup>85</sup>

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<sup>84</sup> Section 132(5)(b) and 137(1)(a).

<sup>85</sup> Schedule 13, para 2(1). Where the penalty is imposed in a Confirmation Decision, Ofcom must also take into account any steps taken by the person towards complying with the duty or requirement specified in the provisional notice of contravention or to remedy the failure (Schedule 13, para 2(3)).

- 4.15 As set out in Ofcom’s Enforcement Guidance,<sup>86</sup> Ofcom may impose a financial penalty in respect of a contravention if it considers that appropriate and proportionate, taking account of the circumstances in the round. In considering the appropriate level of penalty, Ofcom will also take into account the principles set out in its Penalty Guidelines<sup>87</sup> published under section 392 of the Communications Act 2003.<sup>88</sup>
- 4.16 The maximum penalty Ofcom can impose on a person in respect of a regulated service is £18 million or 10% of the person’s QWR for the person’s most recent complete accounting period, whichever is greater.<sup>89</sup> Ofcom’s Online Safety Fees & Penalties Statement<sup>90</sup> defines a provider’s QWR as the total amount of revenue the provider receives during the qualifying period that is referable to the regulated service.<sup>91</sup> Revenue is treated as referable to a regulated U2U service only if and so far as it arises in connection with the provision of those parts of the regulated service where regulated user-generated content may be encountered.<sup>92</sup>

## Penalty considerations

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### It is appropriate to impose a financial penalty in this case

- 4.17 Ofcom finds that it is appropriate to impose a penalty for Youngtek Solutions’ failure to comply with section 12 because:
- a) **Preventing children from encountering pornographic content is a priority outcome for the UK’s online safety regime:** One of the strategic priorities of the Act is to ensure that children do not encounter harmful content online, including pornographic content. Imposing a financial penalty would send a strong message to the industry that non-compliance in this space will not be tolerated.
  - b) **Youngtek Solutions was made aware of the requirements in advance of the implementation date:** Prior to the opening of this investigation, Ofcom engaged substantially with Youngtek Solutions between October 2024 and August 2025. This included Ofcom making Youngtek Solutions aware of multiple occasions of the requirement to implement highly effective age assurance from 25 July 2025. Ofcom requested information about the age assurance measures that Youngtek Solutions intended to implement to comply with its duties under Section 12 of the Act, offering

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<sup>86</sup> [Online Safety Enforcement Guidance](#).

<sup>87</sup> [Penalty Guidelines](#).

<sup>88</sup> Schedule 13, para 2(5) and [Online Safety Enforcement Guidance](#), para 6.43.

<sup>89</sup> Schedule 13, para 4(1). Under section 85(1)(a) of the Act Ofcom has a power to make regulations for the purposes of determining the qualifying worldwide revenue of a provider of a regulated service for an accounting period. Ofcom will also make regulations determining the qualifying worldwide revenue for the purposes of considering financial penalties for group entities, see ss 85(1)(a) and (6) and paragraph 5(9), Schedule 13 to the Act. On 26 June 2025, Ofcom published its [Statement on the implementation of the fees and penalties regime](#) under the Act. The [Online Safety Act 2023 \(Qualifying Worldwide Revenue\) Regulations 2025](#) were laid before Parliament on 26 June 2025 and are now in force.

<sup>90</sup> [Online Safety Fees & Penalties Statement](#).

<sup>91</sup> [Online Safety Act 2023 \(Qualifying Worldwide Revenue\) Regulations 2025](#), para 6(2), read with Schedule 13, para 4(9) of the Act.

<sup>92</sup> “Regulated user-generated content” is defined in section 55(2) of the Act to mean user-generated content, except emails, SMS messages, MMS messages, one-to-one live aural communications, comments and reviews on provider content, identifying content that accompanies such content, and news publisher content. [Online Safety Act 2023 \(Qualifying Worldwide Revenue\) Regulations 2025](#), para 4(2).

support and providing it with relevant guidance. A summary of this correspondence is provided in **Annexes 2 to 39**.

- c) **Imposing a penalty would deter Youngtek Solutions, and the wider sector, from future contraventions:** As set out in Ofcom's Penalty Guidelines,<sup>93</sup> the central objective for imposing a financial penalty is to effectively deter contraventions of regulatory requirements. Ofcom considers that imposing a financial penalty in this case would incentivise Youngtek Solutions' management to take appropriate steps to ensure that it complies in future. It would also send out a broader message to the industry to demonstrate that Ofcom takes compliance with the highly effective age assurance duties extremely seriously and is willing to take action should providers fail to comply.

4.18 Additionally, Ofcom finds that it is appropriate to impose a penalty for Youngtek Solution's failure to comply with its duties under section 102(8) of the Act for the following reasons:

- a) **Gathering accurate and timely information is critical to Ofcom's functions:** Ofcom's powers under section 100 of the Act are crucial to Ofcom's ability to effectively regulate the online sector and protect UK users from primary priority content. A contravention of a requirement to provide information in the manner and form required under section 102(8) is inherently a serious matter as it materially hinders Ofcom's ability to carry out its functions, including Ofcom's ability to assess Youngtek Solutions' compliance with its duties under the Act. In this case, the delay in Youngtek Solutions providing the information requested impeded Ofcom's ability, at a critical stage of the investigation, to confirm the full scope of the services operated by the provider and to ensure that its assessment of the case was informed by complete and up-to-date information, including information relevant to the provider's size and turnover.
- b) **Imposing a penalty would deter Youngtek Solutions - and the wider sector - from future contraventions:** As set out in Ofcom's Penalty Guidelines<sup>94</sup>, the central objective for imposing a financial penalty is to effectively deter contraventions of regulatory requirements. Ofcom considers that imposing a financial penalty in this case would incentivise Youngtek Solutions' management to take appropriate steps to ensure that it complies in future with the duty to act in accordance with statutory information notices, including responding fully and within the specified deadline. It would also send a clear signal to the wider sector that Ofcom takes compliance with its information-gathering powers seriously and that failures to cooperate promptly and properly with investigations will attract enforcement consequences.

## Amount of penalty

4.19 Ofcom has published Penalty Guidelines which set out the factors it may take into account when determining the appropriate amount of a financial penalty.<sup>95</sup> In accordance with paragraph 2(5) of Schedule 13 to the Act, section 392 of the Communications Act 2003, and Ofcom's Online Safety Enforcement Guidance,<sup>96</sup> Ofcom has had regard to the Penalty

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<sup>93</sup> [Penalty Guidelines](#).

<sup>94</sup> [Penalty Guidelines](#).

<sup>95</sup> [Penalty Guidelines](#).

<sup>96</sup> Ofcom is required to have regard to these penalty guidelines when determining the amount of any penalty under s. 392(6) Communications Act 2003; see also paragraph 6.42 of Ofcom's [Online Safety Enforcement Guidance](#).

Guidelines and has set out below its consideration of these factors, to the extent that they are relevant to this case.

- 4.20 Ofcom has also considered whether there are any relevant precedents, noting that while past decisions may be relevant, they are not binding and Ofcom may, considering the circumstances of each case, impose higher penalties in future cases than in previous ones to secure effective deterrence.<sup>97</sup> On the basis of the various elements considered in this section of the Confirmation Decision, Ofcom considers that the penalties in this case are both appropriate and proportionate, while being sufficiently high to effectively deter future breaches.
- 4.21 In determining the appropriate amount of penalty, and having taken into account Youngtek Solutions' representations on the Provisional Decision, Ofcom has treated the contravention of section 12 of the Act in respect of TNAflix.com as arising from a single-day breach on 25 July 2025. This reflects the fact that Ofcom observed TNAflix.com operating without any form of age assurance on that date, and that Ofcom's finding of non-compliance in respect of TNAflix.com is confined to that day. Ofcom has not treated the period after 25 July 2025 as a further period of non-compliance for the purposes of calculating the penalty in relation to TNAflix.com, and has taken this into account when assessing the seriousness, culpability and proportionality of the overall penalty imposed. Ofcom has also taken into account the fact that, since the Provisional Decision, it has decided not to pursue a potential breach in relation to pornrepublic.com. As a result, no findings are made in respect of that service. The assessment of seriousness, culpability and proportionality, and the level of penalty imposed in this Confirmation Decision in relation to section 12, therefore reflect only the contraventions found in relation to empflix.com, imagefap.com, moviefap.com and TNAflix.com.

## Deterrence

- 4.22 As set out in Ofcom's Penalty Guidelines, the central objective of imposing a penalty is deterrence.<sup>98</sup>
- 4.23 Any penalty Ofcom imposes should be sufficiently high to both deter a provider of a regulated service from contravening regulatory requirements, and to deter the wider industry from doing so. The level of the penalty should be high enough that the provider recognises that it is not more profitable for a business to break the law and pay the consequences than it is to comply with the law in the first instance, therefore encouraging good practice and a culture of compliance across the organisation.<sup>99</sup>
- 4.24 In relation to the breach of section 12 of the Act, deterrence is a particularly important objective as the adult sector is large and dispersed, with many hundreds of thousands of services potentially caught by the Act. The introduction of age assurance to prevent children from encountering pornographic content has been strongly resisted by the providers of adult services across the world, and there are obvious incentives for providers to refuse to comply with their duties. It is therefore essential that penalties imposed for a breach of these duties under the Act, act as a strong message both to the provider under investigation

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<sup>97</sup> See paragraph 1.3 of [Penalty Guidelines](#).

<sup>98</sup> See paragraph 1.11 of [Penalty Guidelines](#).

<sup>99</sup> See paragraph 1.5 of [Penalty Guidelines](#).

and the wider adult sector, to show that Ofcom will not tolerate providers of such services putting profit above the safety of children.

- 4.25 In addition, as a general matter, Ofcom is of the view that the need for deterrence in any penalty set for a contravention of information requirements is important, as information notices are fundamental to Ofcom’s regulatory functions, including in the context of online safety regulation.

## Seriousness, harm and culpability

### Seriousness

- 4.26 The requirement of providers to implement highly effective age assurance on their services under section 12 of the Act is key in achieving the Act’s primary objective of making regulated internet services safer for UK users, and particularly for children. Where providers contravene these requirements, children are at risk of encountering harmful<sup>100</sup> content online. In our view, this is therefore a serious contravention of the Act.
- 4.27 In addition, under section 3(2)(g) of the Communications Act 2003, Ofcom is required to secure the adequate protection of citizens from harm presented by content on regulated services, through the appropriate use by providers of systems and processes designed to reduce the risk of such harm. Under section 3(4A) of the Communications Act, in undertaking this provision, Ofcom must have regard to, in part, the need for a higher level of protection for children than for adults. As such, it may be appropriate to impose higher penalties for infringements that expose children to risks of harmful content than contraventions of other duties, but this will necessarily be considered on a case-by-case basis.
- 4.28 Youngtek Solutions was in contravention of its duties under section 12 of the Act between 25 July and 22 September 2025. For different durations during this period, users, including children, could view pornographic content on each of the Youngtek Solutions Websites without highly effective age assurance being in place to prevent child users from encountering such content. As set out above in paragraphs 3.91 to 3.116, the duration of non-compliance differed between services. Youngtek Solutions is also considered to have recommended circumvention of age assurance put in place on one of its services by suggesting users could “use a VPN” should they “prefer to not give out [their] name or anything else to verify [their] age. In its representations on the Provisional Decision, set out in paragraph 3.38, Youngtek Solutions said that the post was made by a volunteer administrator, without knowledge or authorisation from Youngtek Solutions’ management. It said that this individual was not aware that they should not direct or encourage UK users to circumvent the age assurance process, and upon discovery of the post, it had been removed. The provider said that, given the circumstances, and the swift action it had taken, Ofcom should not treat the incident as an aggravating factor of significant weight.
- 4.29 Ofcom acknowledges Youngtek Solutions’ representations. However, as set out above at paragraph 3.107, Ofcom observed that the announcement containing the above comments was still visible on the service on 6 March 2026, after Ofcom had issued its Provisional Decision and received Youngtek Solutions’ representations on it. There was also a more recent comment, posted on 12 February 2026 recommending circumvention contained

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<sup>100</sup> As defined under section 60(2)(a) of the Act, in accordance with section 61(2).

within the same announcement, which appeared to have been posted by the same user as the original post, which again suggested users could “install a VPN in [their] browser[s]”.

- 4.30 In light of the nature of these comments, their continued availability after the Provisional Decision, and their relevance to preventing children from encountering pornographic content, Ofcom considers that this conduct demonstrates a failure to take effective and timely action to prevent the undermining of age assurance measures and will therefore treat it as an aggravating factor in its assessment.
- 4.31 In respect of Youngtek Solutions duties under section 102 of the Act, Ofcom’s powers under section 100 of the Act are crucial to Ofcom’s ability to effectively perform its functions under the Act. A contravention of a requirement to provide information by the deadline in the manner and form required under section 102(8) is therefore inherently a ‘serious’ matter as it materially hinders Ofcom’s ability to carry out its functions.<sup>101</sup> In this case, Youngtek Solutions’ failure to provide information promptly about the services it operates meant that Ofcom was unable to identify at the appropriate point in the investigation whether Youngtek Solutions operated additional services.

## Harm

- 4.32 Ofcom has also considered the degree of harm, whether actual or potential, caused by the alleged contravention.<sup>102</sup>
- 4.33 Ofcom acknowledges the provider’s representations that it did not consider there was any demonstrable evidence of harm or of minors accessing content on its services due to what it described as the “temporary synchronisation issue”. Ofcom notes, however, that regardless of the reason for the services presenting to users as having no age assurance, by Youngtek Solutions’ own account, the application of the age assurance was inconsistent. As set out above at paragraph 2.30, to be considered highly effective, age assurance should be both robust and reliable. The fact Ofcom was able to access the services on the open web from a UK IP address and observed pornographic content on the Youngtek Solutions Websites means that it was possible other users may have also been able to access the websites, and so Ofcom considers there to be evidence of potential harm. The protection of children from normally encountering pornographic content is a cornerstone of the online safety regime in the UK, as provided for in the Act, and is therefore a fundamental priority for Ofcom in exercising its functions under the Act. Ensuring that providers comply with their duties under the Act to prevent children from normally encountering pornographic content from their services is central to securing Parliament’s intention to create a safer life online for UK children.

## Culpability

- 4.34 In line with Ofcom’s Penalty Guidelines, Ofcom has considered the extent to which the contraventions occurred deliberately or recklessly, including the extent to which senior management knew, or ought to have known, that a contravention was occurring or would occur.<sup>103</sup>

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<sup>101</sup> See section 1.12 of [Penalty Guidelines](#).

<sup>102</sup> See section 1.12 of [Penalty Guidelines](#).

<sup>103</sup> By ‘culpability’ Ofcom means ‘the extent to which the contravention occurred deliberately or recklessly, including the extent to which senior management knew, or ought to have known, that a contravention was occurring or would occur’, taken from [Penalty Guidelines](#).

4.35 Given the wide-ranging publicity and communications designed to raise industry awareness of the new duties under the Act, as well as the notifications sent directly to Youngtek Solutions on 23 October 2024, 16 January, 24 April, 11 June, 24 June, 25 June, 18 July and 30 July 2025, by Ofcom in relation to its duties under Part 3, Ofcom considers that Youngtek Solutions was aware of the need to implement highly effective age assurance on its services and had sufficient opportunity to do so. Ofcom notes that, in its representations on the Provisional Decision, Youngtek Solutions stated that it had attempted to implement age assurance on TNAflix.com on 25 July 2025. By Youngtek Solutions own account, it was aware of the requirement to introduce highly effective age assurance on its services. As set out at paragraph 2.26, it is the responsibility of the regulated U2U service provider to ensure that age assurance is implemented in such a way that it is highly effective at determining whether or not a user is a child. Ofcom also considers that Youngtek Solutions was aware of the potential consequences if it did not comply with the requirements of the Act or the Notice. The legal Notice issued to Youngtek Solutions on 10 September 2025 explained the potential consequences if Youngtek Solutions did not respond to the request for information. Following Youngtek Solutions' failure to respond within the deadline, Ofcom issued a final warning on 25 September 2025 and subsequently expanded the scope of the investigation on 10 October 2025. Despite all these communications Youngtek Solutions failed to respond by the deadline, and only provided the information requested after Ofcom issued its Provisional Decision.

### The size and financial position of Youngtek Solutions

- 4.36 In line with Ofcom's Penalty Guidelines,<sup>104</sup> Ofcom considers the size and turnover of the regulated body to ensure that the overall amount of the penalty is appropriate and proportionate to the contravention in respect of which it is imposed.
- 4.37 Ofcom requested financial information from Youngtek Solutions in the Notice, which it did not initially respond to. In the absence of timely information at the Provisional Decision stage, Ofcom made reference to historic publicly available financial data from iCyprus, a service which specialises in search, processing and analysis of data from the Cyprus companies registry<sup>105</sup>. Following the Provisional Decision, Youngtek Solutions provided updated information relating to its QWR, which has enabled Ofcom to assess the provider's financial position on a more current basis.
- 4.38 In representations provided in response to the Provisional Decision, Youngtek Solutions submitted that the proposed penalties were disproportionate in light of its current revenues, profitability and the proportion of its revenue derived from UK users and provided revenue figures for 2025. It stated that its QWR for 2025 was [£<], and that this QWR related to all of its adult services. Youngtek Solutions provided tables separating the QWR by service, revenue, expenses and gross profit; and by different revenue streams; however, it did not provide copies of any financial statements which supported the figures submitted. The provider added that TNAflix.com generated the majority of this revenue, approximately [£<].<sup>106</sup>

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<sup>104</sup> [Penalty Guidelines](#).

<sup>105</sup> [Cyprus Companies Registry Search — i-Cyprus](#)

<sup>106</sup> To convert the \$ figures provided by Youngtek Solutions to £ we have used an average exchange rate for the year 2025 as per [December 2025 HMRC currency exchange average rates - GOV.UK](#).

4.39 Following receipt of Youngtek Solutions’ representations, including its QWR, Ofcom wrote to the provider on 1 May 2026, requesting Youngtek Solutions confirm that its QWR was calculated in accordance with the definition provided to it in the Notice, and to provide any copies of financial records which support the figures it provided. Youngtek Solutions responded on the same date, confirming that it had calculated its QWR in accordance with the definition of QWR as set out to the Notice issued to it on 10 September 2025. It also confirmed that all supporting documentation had already been provided to Ofcom in its representations on the Provisional Decision. See Annexes 67 and 68 for copies of this correspondence. This information has been taken into account when determining the appropriate penalty and, considering this alongside the seriousness of the contraventions and the need for effective deterrence, Ofcom has decided to reduce the penalty from that proposed in the Provisional Decision in relation to the breach of section 12.

## Precedent

- 4.40 Ofcom has previously imposed penalties under the Act for breaches of section 12 and 102(8) and those penalties have been taken into account when assessing an appropriate penalty amount.
- 4.41 While Ofcom has imposed penalties for breaches of section 12 and 102(8) in previous decisions, those penalties are not determinative. Ofcom may depart from earlier penalty levels where necessary to secure effective deterrence, in accordance with the Penalty Guidelines.<sup>107</sup>
- 4.42 Regarding the contravention of section 12, to secure effective deterrence across the adult sector, Ofcom has taken into account the nature of the contraventions identified, including:
- a) the scale and reach of the service and number of UK users affected;
  - b) the ease of access to pornographic content;
  - c) the extended duration of non-compliance despite clear opportunities to implement measures; and
  - d) the nature of the content and associated risks of harm to children.
- 4.43 Ofcom considers that the penalties are proportionate and appropriate in the facts and context of this case for the reasons set out in this section.

## Additional considerations

### Co-operation with investigation

4.44 While Youngtek Solutions engaged with Ofcom throughout the investigation process, as noted in paragraphs 3.16-3.24, it initially objected to Ofcom’s request for information relating to Youngtek Solutions’ Qualifying Worldwide Revenue (‘QWR’) and stated that it would not provide such information. During the period from October 2024 to September 2025, Ofcom sent multiple items of correspondence to Youngtek Solutions regarding its obligations under the Act and its requirement to implement highly effective age assurance by 25 July 2025. As set out in paragraphs 3.6 to 3.19, Ofcom wrote to Youngtek Solutions on several occasions to request information about the measures it intended to take to comply with these duties and, later, to obtain information relevant to the investigation. However, Youngtek Solutions did not substantively acknowledge or respond to several of these

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<sup>107</sup> Paragraph 1.7, [Penalty Guidelines](#).

communications for extended periods. Ofcom has therefore considered Youngtek Solutions' delay in responding promptly as an aggravating factor when determining what it considers to be an appropriate penalty.

- 4.45 However, this is balanced against the fact that Youngtek Solutions did implement a method of age assurance that is capable of being highly effective within the meaning of the Act on empflix.com, imagefap.com, moviefap.com in response to Ofcom's decision to open an investigation into its compliance with the Act (and had already implemented a form of age assurance on TNAflix.com prior to investigation). Following the issuing of the Provisional Decision, Ofcom identified an issue with the age assurance implemented on two of the Youngtek Solutions Websites. Ofcom contacted Youngtek Solutions regarding this issue, and the provider promptly responded and rectified the issue the same day. Ofcom has considered these actions as mitigating factors when considering the level of penalty.

## Gain

- 4.46 By failing to comply with the requirements under section 12 of the Act, we consider that Youngtek Solutions may have benefitted from financial gain through the alleged contravention, by avoiding the costs associated with implementing highly effective age assurance, and potentially by attracting additional UK users to its service(s), who may have wished to avoid age assurance measures in place on services complying with their duties under Part 3 of the Act, to the detriment of those compliant services which may have lost customers as a result.
- 4.47 When determining the penalty amount, Ofcom has also considered the potential harm caused to other businesses that have complied with their duties under the Act. Providers of compliant services invested time and resources to meet these duties, which may have caused them to lose users and business to non-compliant competitors. If not complying with the Act allows providers to benefit, it discourages compliance. In addition to any potential gain made by Youngtek Solutions, the penalty therefore also reflects the unfair disadvantage placed on providers in the sector who implemented the required measures by the deadline of 25 July 2025.
- 4.48 As such, and while Ofcom does not consider it necessary to quantify these amounts, we consider that any penalty imposed should be set at a level to at least remove any financial benefit gained through non-compliance, and ensure that regulated providers recognise that it is not more profitable for a business to break the law and pay the consequences, than it is to comply with the law in the first place.

## Previous breaches

- 4.49 Ofcom has not previously found Youngtek Solutions to be in breach of the Act.

## Confirmation Decision on penalty

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- 4.50 Ofcom has reasonable grounds to believe that Youngtek Solutions has failed to comply with both section 12 and section 102(8) of the Act. As such, Ofcom finds that it is appropriate to impose a penalty for each breach within the Confirmation Decision. This approach reflects the fact that the Notice was issued to (1) understand Youngtek Solutions' QWR for the purpose of assessing a penalty in relation to its non-compliance with section 12 and (2) for assessing the age assurance measures in place on any other services operated by Youngtek Solutions that allow pornographic content.

- 4.51 We have decided to impose single financial penalties in relation to both section 12 and section 102(8). Single penalties are appropriate to the seriousness of the failures to comply with sections 12 and 102(8) and to incentivise Youngtek Solutions to comply with its duties under the Act in the future.
- 4.52 Taking into consideration the factors set out above, Ofcom has decided to impose single penalties of:
- a) £500,000 in respect of Youngtek Solutions contravention of section 12 of the Act during the Relevant Period, by failing to implement age verification or age estimation (or both) to ensure that children are prevented from encountering pornographic content; and
  - b) £100,000 in respect of its contravention of section 102(8) of the Act, by failing to provide information requested under section 100(1).
- 4.53 Ofcom requires Youngtek Solutions pay the penalties by no later than 26 July 2026.
- 4.54 Taking into account all the circumstances of this case, we consider that the penalties are compatible with Article 10 of the Human Rights Act 1998.<sup>108</sup>
- 4.55 In the event that Youngtek Solutions fails to pay the penalties specified above, Ofcom may seek recovery of those penalties in accordance with paragraph 6 of Schedule 13 to the Act.<sup>109</sup>
- 4.56 Under section 168 of the Act, if Youngtek Solutions wishes to challenge this Confirmation Decision, it has a right to appeal to the Upper Tribunal. The Upper Tribunal will decide such an appeal by applying judicial review principles and has the power to quash the Confirmation Decision. Further information about the Upper Tribunal, including guidance about the appeal process, is available on its website: <https://www.judiciary.uk/courts-and-tribunals/tribunals/upper-tribunal/>.

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<sup>108</sup> Ofcom recognises that the obligations imposed by the Act and the imposition of a financial penalty engage Article 10 of the European Convention on Human Rights. Any interference is prescribed by law and pursues legitimate aims, in particular the protection of children from harm. The measures in this Decision, including the requirement to implement highly effective age assurance, are targeted, do not prevent lawful access to content by adults, and are proportionate, as is the level of penalty imposed having regard to the nature and duration of the contraventions. Ofcom therefore considers this Decision is compatible with Article 10.

<sup>109</sup> [Online Safety Enforcement Guidance](#)

## 5. Annex index

Annex reference	Summary of contents	Name of document
Annex 1 <b>Content warning: explicit content</b>	A document containing screenshots of the user journey mapping process to evidence access to pornographic content without going through age assurance, for the Youngtek Solutions websites.	Annex 1 – Youngtek Solutions websites user mapping journeys
Annex 2 <b>Content warning: explicit content</b>	<p>A document containing screenshots of the user journey to evidence access to pornographic content without going through age assurance, for the services empflix.com, imagefap.com and moviefap.com both prior to, and after the investigation was opened 10 September 2025.</p> <p>The document also contains screenshots of the age assurance process observed on the Youngtek Solutions websites.</p> <p>Screenshots were taken on 31 July 2025, 9, 11, 12, 15, 22, 29 September 2025.</p> <p>The document also contains screenshots of admin announcements posted on imagefap.com regarding the “age registration” process captured on 11 and 15 September 2025.</p>	Annex 2 - Youngtek Solutions additional user journey reviews July to September 2025
Annex 3	An email from Ofcom to support@tnaflix.com regarding the age assurance requirements for porn providers.	Annex 3 – 20241023 cover email Supervision team to Youngtek Solutions
Annex 3a	A letter from Ofcom to support@tnaflix.com providing information regarding the age assurance duty and inviting the provider to a meeting.	Annex 3a – 20241023 letter Supervision team to Youngtek Solutions
Annex 4	An email from [redacted]@tnaflix.com asking if Ofcom provides age assurance solutions.	Annex 4 – 20241025 Youngtek Solutions to Supervision
Annex 5	An email from Ofcom to [redacted]@tnaflix.com explaining that Ofcom is the UK’s online safety regulator.	Annex 5 – 20241027 Supervision to Youngtek Solutions
Annex 6	An email from [redacted]@tnaflix.com enquiring about Ofcom’s purpose.	Annex 6 – 20241030 Youngtek Solutions to Supervision
Annex 7	An email from Ofcom to [redacted]@tnaflix.com reiterating that Ofcom is the UK’s online safety regulator and inviting the provider to a meeting.	Annex 7 – 20241120 Supervision to Youngtek Solutions

Annex 8	An email from Ofcom to [X]@tnaflix.com about Ofcom's Illegal Harms Statement and future Requests for Information.	Annex 8 – 20241217 Supervision to Youngtek Solutions
Annex 9	An email from Ofcom to [X]@tnaflix.com regarding an upcoming information notice relating to categorisation.	Annex 9 – 20241218 Information Registry to Youngtek Solutions
Annex 10	An email from Ofcom to [X]@tnaflix.com providing a draft information notice.	Annex 10 – 20250113 cover email Information Registry to Youngtek Solutions
Annex 10a	Draft request for information under the Online Safety Act addressed to Youngtek Solutions concerning categorisation dated 13 January 2025.	Annex 10a – 20250113 letter Information Registry to Youngtek Solutions
Annex 11	An email from Ofcom to [X]@tnaflix.com providing Ofcom's Age Assurance and Children's Access Statement.	Annex 11 – 20250116 Supervision to Youngtek Solutions
Annex 12	An email from Ofcom to [X]@tnaflix.com containing Ofcom announcements.	Annex 12 – 20250121 Supervision to Youngtek Solutions
Annex 13	An email from Ofcom to [X]@tnaflix.com providing a final information notice concerning categorisation.	Annex 13 – 20250327 cover email Information Registry to Youngtek Solutions
Annex 13a	Final request for information under the Online Safety Act addressed to Youngtek Solutions dated 27 March 2025.	Annex 13a – 20250327 letter Information Registry to Youngtek Solutions
Annex 14	An email from [X]@tnaflix.com providing a response to Ofcom's information notice.	Annex 14 – 20250331 cover email Youngtek Solutions to Information Registry
Annex 14a	A letter from [X]@tnaflix.com to Ofcom responding to Ofcom's information notice.	Annex 14a – 20250331 letter Youngtek Solutions to Information Registry
Annex 15	An email from Ofcom to [X]@tnaflix.com confirming receipt of Youngtek Solutions' response to the information notice.	Annex 15 – 20250402 Information Registry to Youngtek Solutions
Annex 16	An email from Ofcom to support@tnaflix.com providing a letter regarding the upcoming requirement to introduce highly effective age assurance.	Annex 16 – 20250424 cover email Supervision to Youngtek Solutions
Annex 16a	A letter from Ofcom to support@tnaflix.com regarding the upcoming requirement to introduce highly effective age assurance.	Annex 16a – 20250424 letter Supervision to Youngtek Solutions

Annex 17	An email from [X]<[redacted]>@tnaflix.com providing Ofcom with a copy of its response to Ofcom's information notice dated 31 March 2025.	Annex 17 – 20250424 Youngtek Solutions to Information Registry
Annex 18	An email from Ofcom to [X]<[redacted]>@tnaflix.com confirming receipt of Youngtek Solutions' response to the information notice.	Annex 18 – 20250425 Information Registry to Youngtek Solutions
Annex 19	An email from Ofcom to [X]<[redacted]>@tnaflix.com requesting confirmation of Youngtek Solutions plan for implementation of highly effective age assurance.	Annex 19 – 20250514 Supervision to Youngtek Solutions
Annex 20	An email from Ofcom to [X]<[redacted]>@tnaflix.com and support@tnaflix.com requesting Youngtek Solutions outline its plans for compliance with the age assurance duties.	Annex 20 – 20250609 Supervision to Youngtek Solutions
Annex 21	An email from [X]<[redacted]>@tnaflix.com to Ofcom querying a lack of response to its response to the information notice.	Annex 21 – 20250610 Youngtek Solutions to Supervision
Annex 22	An email from [X]<[redacted]>@tnaflix.com to Ofcom requesting confirmation of receipt of the previous email.	Annex 22 – 20250611 Youngtek Solutions to Supervision
Annex 23	An email from Ofcom to [X]<[redacted]>@tnaflix.com acknowledging Youngtek Solutions' email and its intention to respond.	Annex 23 – 20250611 Supervision to Youngtek Solutions
Annex 24	An email from [X]<[redacted]>@tnaflix.com to Ofcom expressing concern regarding Ofcom's correspondence.	Annex 24 – 20250611 Youngtek Solutions to Supervision
Annex 25	An email from Ofcom to [X]<[redacted]>@tnaflix.com providing previous correspondence sent from Ofcom to Youngtek Solutions.	Annex 25 – 20250611 Supervision to Youngtek Solutions
Annex 26	An email from Ofcom to [X]<[redacted]>@tnaflix.com providing a response from the categorisation team in relation to Youngtek Solutions response to the information notice.	Annex 26 – 20250618 Supervision to Youngtek Solutions
Annex 27	An email from [X]<[redacted]>@tnaflix.com to Ofcom requesting an update on the categorisation assessment.	Annex 27 – 20250620 Youngtek Solutions to Supervision
Annex 28	An email from Ofcom to [X]<[redacted]>@tnaflix.com explaining that the requirement to implement highly	Annex 28 – 20250624 Supervision to Youngtek Solutions

	effective age assurance is separate to the categorisation process.	
Annex 29	An email from [X]@tnaflix.com to Ofcom requesting a response to its letter of 31 March 2025 and written confirmation of the requirements to implement highly effective age assurance.	Annex 29 – 20250624 Youngtek Solutions to Supervision
Annex 30	An email from Ofcom to [X]@tnaflix.com responding to the points raised by Youngtek Solutions in its email of 24 June 2025.	Annex 30 – 20250625 Supervision to Youngtek Solutions
Annex 31	An email from [X]@tnaflix.com to Ofcom expressing concern about Ofcom’s correspondence and requesting a formal response to a number of points raised.	Annex 31 – 20250626 Youngtek Solutions to Supervision
Annex 32	An email from Ofcom to [X]@tnaflix.com acknowledging receipt of Youngtek Solutions’ email of the same date, and Ofcom’s intention to respond in full.	Annex 32 – 20250626 Supervision to Youngtek Solutions
Annex 33	An email from [X]@tnaflix.com to Ofcom reiterating points raised in its previous correspondence and requesting a response in full.	Annex 33 – 20250627 Youngtek Solutions to Supervision
Annex 34	An email from Ofcom to [X]@tnaflix.com acknowledging receipt of Youngtek Solutions email of 27 June 2025.	Annex 34 – 20250627 Supervision to Youngtek Solutions
Annex 35	An email from Ofcom to [X]@tnaflix.com containing a letter responding to the matters raised by Youngtek Solutions.	Annex 35 – 20250718 cover email Supervision to Youngtek Solutions
Annex 35a	A letter from Ofcom to [X]@tnaflix.com providing clarification regarding a number of points raised by Youngtek Solutions.	Annex 35a – 20250718 letter Supervision to Youngtek Solutions
Annex 36	An email from [X]@tnaflix.com to Ofcom containing a “formal declaration and notice”.	Annex 36 – 20250728 cover email Youngtek Solutions to Supervision
Annex 36a	A letter from [X]@tnaflix.com to Ofcom containing a declaration about the service tnaflx.com and request for it to be blocked by UK Internet Service Providers.	Annex 36a – 20250728 letter Youngtek Solutions to Supervision

Annex 37	An email from Ofcom to [redacted]@tnaflix.com reiterating that it is the responsibility of service providers to comply with the duties in the Online Safety Act.	Annex 37 – 20250730 Supervision to Youngtek Solutions
Annex 38	An email from [redacted]@tnaflix.com to Ofcom reiterating points made in its correspondence of 28 July 2025.	Annex 38 – 20250731 Youngtek Solutions to Supervision
Annex 39	An email from Ofcom to [redacted]@tnaflix noting that TNAflix.com appeared to have implemented an age assurance solution that could be capable of being highly effective, but reminding Youngtek Solutions that service providers should not encourage UK users to circumvent the age assurance process.	Annex 39 – 20250801 Supervision to Youngtek Solutions
Annex 40	An email from Ofcom to multiple Youngtek Solutions' email addresses on 10 September 2025 providing an investigation opening letter and final legal notice.	Annex 40 - 20250910 email from Ofcom to Youngtek Solutions
Annex 40a	Investigation opening letter regarding compliance with section 12 duties addressed to Youngtek Solutions dated 10 September 2025.	Annex 40a - 20250910 Youngtek Solutions Ltd investigation opening letter - CW013190925
Annex 40b	Final Legal Notice requesting information addressed to Youngtek Solutions dated 10 September 2025.	Annex 40b - 20250910 02070447 Youngtek Solutions Ltd s100 Legal Notice - final
Annex 41	An email from Ofcom to multiple Youngtek Solutions email addresses on 25 September 2025 providing a final warning letter regarding the final legal notice.	Annex 41 - 20250925 email from Ofcom to Youngtek Solutions
Annex 41a	Letter addressed to Youngtek Solutions with a warning regarding the failure to respond to the final legal notice and explaining the next steps if there is no response dated 25 September 2025.	Annex 41a – 20250925 02070447 Youngtek Solutions Ltd final warning - duty to comply with legal notice
Annex 42	An email from [redacted]@tnaflix.com to Ofcom acknowledging receipt of the final legal notice, confirming its intention to respond by 30 September 2025.	Annex 42 – 20250925 email from Youngtek Solutions to Ofcom
Annex 43	An email from [redacted]@tnaflix.com to Ofcom requesting Ofcom confirm receipt of its email dated 25 June 2025.	Annex 43 – 20250926 email from Youngtek Solutions to Ofcom
Annex 44	An email from Ofcom to [redacted]@tnaflix.com confirming receipt of its email dated 25 June 2025, stating that it looked forward to receiving the information by 30 September 2025.	Annex 44 – 20250926 email from Ofcom to Youngtek Solutions
Annex 45	An email from Ofcom to multiple Youngtek Solutions email addresses on 10	Annex 45 – 20251010 email from Ofcom to Youngtek Solutions

	October 2025 providing a letter regarding expanding the scope of the investigation to include failure to comply with the Information Notice.	
Annex 45a	Letter addressed to Youngtek Solutions Ltd advising that the scope of the investigation is being expanded to include failure to comply with the Information Notice.	Annex 45a – 20251010 CW013190925 Youngtek Solutions – investigation update
Annex 46	An email from [redacted]@tnaflix.com to Ofcom explaining that it would not respond to the questions in the legal notice, and that it had implemented age assurance measures. Youngtek Solutions also reiterated its position on UK internet service providers and provided information about its relationship with UK users.	Annex 46 – 20251010 email from Youngtek Solutions to Ofcom
Annex 47	An email from Ofcom to [redacted]@tnaflix.com acknowledging receipt of Youngtek Solutions’ email dated 10 October 2025.	Annex 47 – 20251021 email from Ofcom to Youngtek Solutions
Annex 48	An email from Ofcom to multiple Youngtek Solutions’ email addresses on 30 October 2025 providing a letter in respond to its email of 10 October 2025.	Annex 48 – 20251030 email from Ofcom to Youngtek Solutions
Annex 48a	A letter addressed to Youngtek Solutions Ltd dated 30 October 2025 repoding to the points raised in Youngtek Solutions email of 10 October 2025.	Annex 48a – 20251030 letter from Ofcom to Youngtek Solutions – response to 10 Oct email
Annex 49	An email from Ofcom to multiple Youngtek Solutions’ email addresses on 20 January 2026 providing a final legal notice.	Annex 49 – 20260120 email from Ofcom to Youngtek Solutions
Annex 49a	Final Legal Notice requesting information addressed to Youngtek Solutions dated 20 January 2026.	Annex 49a – 20260120 02124827 Youngtek Solutions Ltd s100 Legal Notice – final
Annex 50	An email from Ofcom to multiple Youngtek Solutions’ email addresses on 28 January 2026 providing a final warning letter regarding the final legal notice.	Annex 50 – 20260128 email from Ofcom to Youngtek Solutions
Annex 50a	Letter addressed to Youngtek Solutions with a warning regarding the failure to respond to the final legal notice and explaining the next steps if there is no response. Dated 28 January 2026.	Annex 50a – 20260128 02124827 Youngtek Solutions Ltd Reminder Final Notice
Annex 51	An email from Youngtek Solutions to Ofcom containing copies of the written record of its CAA for each of the Youngtek Solutions Websites.	Annex 51 – 20260128 email from Youngtek Solutions to Ofcom
Annex 51a	A copy of the Children’s Access Assessment for empflix.com completed by Youngtek Solutions and dated 2025.	Annex 51a – 20260128 empflix.com Children’s Access Assessment

Annex 51b	A copy of the Children’s Access Assessment for imagefap.com completed by Youngtek Solutions and dated 2025.	Annex 51b – 20260128 imagefap.com Children’s Access Assessment
Annex 51c	A copy of the Children’s Access Assessment for moviefap.com completed by Youngtek Solutions and dated 2025.	Annex 51c – 20260128 moviefap.com Children’s Access Assessment
Annex 51d	A copy of the Children’s Access Assessment for TNAflix.com completed by Youngtek Solutions and dated 2025.	Annex 51d – 20260128 TNAflix.com Children’s Access Assessment
Annex 52	An email from [X]@tnaflix.com to Ofcom containing representations on Ofcom’s Provisional Decision issued on 11 February 2026.	Annex 52 – 20260302 Youngtek Solutions to Ofcom
Annex 52a	A PDF containing Youngtek Solutions’ representations on Ofcom’s Provisional Decision.	Annex 52a – 20260302 Youngtek Solutions representations on Provisional Decision
Annex 53	An email from Ofcom to [X]@tnaflix.com acknowledging receipt of Youngtek Solutions’ email dated 2 March 2026.	Annex 53 - 20260304 Ofcom to Youngtek Solutions
Annex 54	A copy of the search results for ‘Youngtek Solutions Limited’ on the Companies Section of the Department of Companies and Intellectual Property Cyprus accessed 16 December 2025.	Annex 54 – Department of Companies and Intellectual Property Cyprus – Youngtek Solutions Ltd
Annex 55	The terms of service for empflix.com accessed on 2 September 2025.	Annex 55 – empflix.com Terms of service accessed 2 September 2025
Annex 56	The privacy policy for imagefap.com accessed on 3 September 2025.	Annex 56 – imagefap.com Privacy Policy accessed 3 September 2025
Annex 57	The 2257 statement for imagefap.com accessed on 3 September 2025.	Annex 57 – imagefap.com 2257 statement accessed 3 September 2025
Annex 58	The terms of service for imagefap.com accessed on 3 September 2025.	Annex 58 – imagefap.com Terms of Service accessed 3 September 2025
Annex 59	The DMCA policy for imagefap.com accessed on 3 September 2025.	Annex 59 – imagefap.com DMCA policy accessed 3 September 2025
Annex 60	The FAQ page for imagefap.com accessed on 3 September 2025.	Annex 60 – imagefap.com FAQ accessed 3 September 2025
Annex 61	The 2257 statement for moviefap.com accessed on 3 September 2025.	Annex 61 – moviefap.com 2257 statement accessed 3 September 2025
Annex 62	The terms of service for moviefap.com accessed on 3 September 2025.	Annex 62 – moviefap.com Terms of Service accessed 3 September 2025
Annex 63	The DMCA policy for moviefap.com accessed on 3 September 2025.	Annex 63 – moviefap.com DMCA policy accessed 3 September 2025
Annex 64	The terms of service for TNAflix.com accessed 3 October 2025.	Annex 64 – TNAflix.com Terms of Service accessed 3 October 2025

Annex 65	A table of all the email addresses used by Ofcom between 27 October 2024 and 10 September 2025 to correspond with Youngtek Solutions, where Ofcom obtained the email address from, and the delivery status in relation to each email address for the investigation opening documents.	Annex 65 - Summary of email address source and status
Annex 65a	A PDF with screenshots of the sources of the email addresses used to correspond with Youngtek Solutions between 27 October 2024 and 10 September 2025 and the delivery status for the investigation opening documents.	Annex 65a - Email source and delivery status
Annex 66	A PDF containing screenshots of the user journey on 6 March 2026 to evidence an announcement and further comments on imagefap.com.	Annex 66 – imagefap.com additional site check 6 March 2026
Annex 67	An email from Ofcom to [redacted]@tnaflix.com asking further questions about Youngtek Solutions' QWR.	Annex 67 – 20260501 email from Ofcom to Youngtek Solutions
Annex 68	An email from [redacted]@tnaflix.com responding to Ofcom's questions.	Annex 68 – 20260501 email from Youngtek Solutions to Ofcom