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Findings of AnyVision Audit

In October 2019, Microsoft Corporation (“Microsoft”) retained Eric Holder and his team at Covington & Burling LLP (“Covington”) to conduct an audit of AnyVision Interactive Technologies Ltd. (“AnyVision”) after media reports emerged alleging that AnyVision’s facial recognition technology was being used to conduct mass surveillance in the West Bank. A central focus of the audit, which was conducted pursuant to the Microsoft Global Finance Portfolio Company Pledge on Facial Recognition signed by AnyVision, was whether the media reports concerning the role of AnyVision’s technology in Israel, and particularly the West Bank, could be substantiated.

Following a thorough review, Covington has concluded its audit. Based on the evidence reviewed, Covington confirmed that AnyVision technology is used in border crossing check points between Israel and the West Bank, as acknowledged by AnyVision in response to media inquiries and confirmed to Microsoft. Legal restrictions prevent discussion of additional relevant use cases considered by Covington but not specifically mentioned in media reports. The available evidence, however, demonstrates that AnyVision’s technology has not previously and does not currently power a mass surveillance program in the West Bank that has been alleged in media reports. As such, Covington could not substantiate a breach of the Microsoft Global Finance Portfolio Company Pledge on Facial Recognition.

These findings were informed by interviews of AnyVision employees and third parties, review of accounting records, technical specifications, and other documentary evidence, product demonstrations of AnyVision’s technology, and a site visit to AnyVision’s facilities in Holon, Israel. Covington’s review was limited in certain respects by legal restrictions on the disclosure of sensitive information.