CMA SMS Investigation into Apple's Mobile Platform
Commitments Concerning App Certainty and Developer Requests for Interoperability
Regarding the iOS and iPadOS Platforms

10 February 2026

Introduction

(1)   This document contains Apple's commitments in relation to possible concerns that the CMA has indicated it is considering regarding: (1) Apple's App Review process; (2) App Store search results; (3) Apple's use of third-party data collected through its operation of the App Store and during App Review; and (4) the transparency of Apple's process for considering requests for interoperable access to functionality in iOS and iPadOS.

(2)   These commitments shall take effect from 1 April 2026.

(3)   Unless otherwise indicated, references to annual reporting in these commitments will reflect the following reporting schedule:

   (a)   For App Review, App Store search, and Apple's use of third-party data: 1 January - 31 December, with the report published by no later than 31 March in the following year. For avoidance of doubt, the first report will cover the period 1 January 2026 - 31 December 2026.

   (b)   For interoperability: 1 July - 30 June, with the report published by no later than 30 September in the same year. For the avoidance of doubt, the first report will cover the period of 1 January 2026 - 30 June 2026.

(4)   References to bi-annual reporting in these commitments will reflect the following reporting schedule: (i) 1 January - 30 June, with the report submitted to the CMA by no later than 30 September of the same year; and (ii) 1 July - 31 December, with the report submitted to the CMA by no later than 31 March of the following year.[1] For avoidance of doubt, the first reports will cover the period 1 January 2026 - 30 June 2026.

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[1]   Apple will provide the CMA, on a confidential basis, the metrics in paragraph 9 of the App Review commitments for UK-based app developers for the period between 1 July 2025 - 31 December 2025 by no later than 31 May 2026.   Thereafter, Apple will publish these annual metrics according to the cadence in paragraph 3(a) of the Introduction.

App Review

Background

Apple reviews every app in the App Store for compliance with the App Review Guidelines ("**Guidelines**"). App Review is essential to ensure that Apple maintains a safe, secure, and high-quality experience for its users to interact with apps and services offered by developers on its platforms. Apple is committed to ensuring that it conducts App Review in an objective, fair, and transparent manner.

Apple has set out below targeted measures it is prepared to enter into to address the concerns that Apple understands the CMA is seeking to address.

Commitments

(1)   The App Review Guidelines will be fair, objective, and transparent. Apple will conduct its App Review process on the basis of the Guidelines and will not preference Apple's competitive interests over those of developers.

(2)   The App Review function will be performed by a dedicated, expert App Review team, who, within Apple, will operate independently from teams responsible for Apple's apps and services.

(3)   Apple's App Review team will review apps against the Guidelines in effect at the time of the submission to maintain the consistency and reliability of App Review decisions.

(4)   Apple will offer developers dedicated support and resources to ensure the App Review experience is transparent and efficient. In particular:

(a)   Apple will maintain detailed public documentation to guide developers on the requirements of the App Review process and to highlight common issues to avoid.

(b)   Where developers have questions about how the Guidelines would apply in scenarios that they believe may not be covered by existing published materials, Apple will offer developers the opportunity to engage directly with expert App Review personnel, including in dedicated 1:1 sessions where appropriate.

(c)   For developers that have made app submissions, Apple will provide developers with functionality such as App Store Connect, to manage their submissions and communicate directly with App Review.

(d)   For developers that are making improvements to beta apps, Apple will provide resources such as TestFlight to enable developers to collect feedback and resolve issues before submitting for App Review.[2]

(5)   Apple will commit to ensuring app submissions are reviewed in a timely fashion:

(a)   Apple will seek to provide a rejection or approval decision for 90% of app submissions within 24 hours.

(b)   Where apps raise complex issues, additional time may be required to ensure the Guidelines are applied fairly and objectively. Apple will review such apps expeditiously within the time appropriate to the nature and circumstances of each submission.

(c)   Apple will maintain an expedited review mechanism for developers to seek and obtain a fast-track review under exigent circumstances, including updates to patch a critical bug or where the app's purpose is tied to a specific event, such as game competitions or live-streamed experiences.

(6)   App Review will provide developers with strong procedural safeguards throughout the process. In particular:

(a)   Upon reasonable request from a developer via App Store Connect, Apple will provide them with updates regarding the status of their submission.

(b)   If an app submission is rejected, Apple will provide the developer with an explanation of how its submission contravenes the Guidelines when notifying the developer of the rejection decision.

(c)   If a developer disagrees with an initial decision, Apple will allow the developer to appeal that decision as a matter of right to the App Review Board.

(d)   If a developer objects to a Guideline, Apple will allow them to challenge the Guideline itself via an appeal to the App Review Board or request that a Guideline be added or revised via forms that Apple makes publicly available.

Transparency

(7)   Apple is committed to demonstrating on an ongoing basis that the App Review process is fair, objective, and transparent. To do so:

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[2]   Apple Developer, TestFlight Overview.

(a)   Apple will maintain and update the Guidelines as a public document so that developers, users, and other stakeholders can understand clearly the standards to which apps are held.

(b)   Apple will announce any material changes to the Guidelines to developers on the same day such changes become effective. Apple will also explain the material changes alongside its announcement, and make resources available to developers to ensure they understand the relevant changes in a timely manner. These resources will include: (i) tools like App Store Connect to pose written questions or feedback; and (ii) dedicated 1:1 sessions where appropriate.

(c)   Apple will set up and maintain a dedicated channel to receive complaints from developers on its commitments relating to the CMA's stated concerns, including those involving App Review.

(d)   Apple will maintain safeguards for developers in connection with any app removal decisions, including the P2B complaints handling mechanism.

(8)   Apple will make an annual public statement confirming that:

(a)   Apple has operated the App Review function in a fair, objective, and transparent manner.

(b)   App Review continues to operate independently from teams responsible for Apple's apps and services.

(c)   The policy of reviewing against the Guidelines in effect at the time of the submission remains in effect.

(d)   All material changes to the Guidelines were communicated in a timely manner.

(9)   Apple will publish annual metrics for UK-based app developers on:

(a)   App submissions reviewed.

(b)   App rejections.

(c)   Apps approved after rejection.

(d)   Appeals from rejections.

(e)   Apps approved after appeal (if the rejection was overturned).

(f)   App Store removals.

(g)   App Store removal appeals.

(h)   Restorations after appeals of removals (if the removal was overturned).

(i)   The percentage of App Reviews completed within 24 hours.

(j)   The percentage of App Reviews completed in more than 24 hours.

(k)   The number of expedited reviews.

(10)   Apple will publish information and developments on support, tools, and other resources as and when they are available.

(11)   Apple will publish reporting on P2B complaints handling on the annual reporting period cadence as reflected on its Developer Support site.[3] This reporting will include:

(a)   Number of complaints filed.

(b)   Types of complaints.

(c)   Average time to process complaints.

(d)   Aggregated information regarding the outcome of the complaints (see the relevant categories of information on Apple's Developer Support site).[4]

(12)   Apple will publish annual reporting on the number of complaints received through the dedicated channel referred to in paragraph 7(c) as they relate to App Review, broken out by the functional categories of issues associated with these complaints.

Compliance and Monitoring

(13)   Apple will provide additional, more detailed, and confidential information to the CMA to assist it in monitoring compliance and the effectiveness of these commitments. This will include information relating to:

(a)   The continued independent operation of Apple's App Review team on a bi-annual basis.

(b)   Developer access to and usage of Apple's support and resources on an annual basis.

(c)   Explanations of any material changes to Apple's support, resources, and App Review Guidelines, and the rationale for such changes on an annual basis.

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[3]   *See* Apple Developer, App Store annual report on P2B internal complaint-handling system.

[4]   *Ibid*.

(d)   Summary metrics relating to the timing and functioning of App Review processes on a bi-annual basis.

(e)   Complaints collected through the dedicated channel referred to in paragraph 7(c) as it relates to App Review on a bi-annual basis.

(f)   Any relevant P2B mediations, including a summary of issues mediated and outcomes on an annual basis.

App Store Search

Background

The App Store is a great place for users to discover new and exciting apps, and this is due in significant part to the App Store's organic search and presentation of results. App Store organic search has been designed to give users the highest-quality results to help them discover the best apps for their needs.

Apple has set out below targeted measures it is prepared to enter into to address the concerns that Apple understands the CMA is seeking to address.

Commitments

(1)   Apple will ensure that its search process is fair, objective, and transparent. In particular, Apple will ensure that its approach (including the training of its search algorithm) prioritises user engagement, app quality, and delivering users the most relevant results, and does not self-preference Apple's own first-party apps. Apple will retain the ability to take reasonable steps to prevent and combat fraud, abuse, and other forms of manipulation of search results.

(2)   Apple will train the search algorithm to deliver the most relevant results for users. Apple will maintain or implement measures: (i) to ensure the objectivity, quality and consistency of the human assessments; and (ii) to minimise any risk of bias in the search algorithm and presentation of results. These protections include:

   (a)   Ensuring that human assessments are conducted by individuals, including third parties, that operate independently from teams responsible for Apple's apps and services.

   (b)   Subjecting human assessors to strong guidelines to maintain the objectivity, quality, and consistency of their assessments.

   (c)   Ensuring that sample queries are assessed by multiple human assessors to provide consistency and protections against assessments that deviate from the guidelines and training provided.

   (d)   Conducting oversight to ensure reviewer compliance with guidelines.

   (e)   Providing developers with sufficient channels through which to report concerns to and have concerns addressed appropriately by Apple.

Transparency

(3)   Apple will ensure that the search process and presentation of results is fair, objective, and transparent by providing developers with information and support to help optimise and improve search results and maintaining transparency in how the search process and presentation of results works to deliver the most relevant results for users. In particular:

(a)   Apple will maintain public materials identifying the key factors having a bearing on search result relevance, including text relevance and customer behaviour.

(b)   If Apple were to make major changes, for apps on the UK App Store storefront, to the inputs used in its search algorithm (such as no longer focusing on customer behaviour or textual relevance inputs) or presentations of results that would render the then available public guidance out of date,[5] Apple will: (i) provide a reasonable period of advance notice of approximately one week that such changes will be upcoming; and (ii) update its guidance materials to reflect these changes within a reasonably short period after such changes have been implemented. For any such changes to inputs used in its search algorithm, Apple will also explain the reasons for such changes.

(c)   Apple will provide analytics tools that allow developers to measure and track their search performance.

(d)   Apple will set up and maintain a dedicated channel to receive complaints from UK developers on its commitments relating to the CMA's stated concerns, including those relating to search and presentation of results.

(e)   Apple will publish annual reporting on the number of complaints received through the dedicated channel referred to in paragraph 3(d) as they relate to App Store organic search and the presentation of results, broken out by functional categories of issues associated with these complaints.

(4)   Apple will make an annual public statement confirming that:

(a)   Apple has operated the App Store organic search function in a fair, objective, and transparent manner.

(b)   Apple's human assessments continue to be conducted by individuals, including third parties, that operate independently from the teams responsible for Apple's apps and services.

(c)   Human assessors remain subject to strong guidelines.

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[5]   *See* Apple Developer, App Store search.

Compliance and Monitoring

(5) Apple will conduct regular internal compliance evaluations and prepare bi-annual confidential reports demonstrating that it continues to employ fair and objective processes to train the search algorithm. These reports will be provided confidentially to the CMA on a bi-annual basis. These reports would include:

(a) Confirmations that Apple has maintained its best practices to ensure that its search process and presentation of results is delivering the most relevant results for users as detailed above.

(b) Apple will provide an appropriate description of: (i) the objectives (or purposes) that the algorithm is trained to fulfil; and (ii) the data inputs used to train the algorithm, so that the CMA has the ability to monitor the foundation upon which the algorithm is trained to achieve high quality search and presentation of results in a fair, transparent, and objective manner.

(c) Metrics regarding complaints which Apple receives from the dedicated channel involving App Store organic search and the presentation of results.

(d) A summary description of: (i) the offline relevance checks Apple uses to evaluate app rankings; and (ii) conversion rates Apple uses to monitor app rankings.

(6) Apple will provide additional, more detailed, and confidential information to the CMA to assist it in monitoring compliance and the effectiveness of these commitments. This reporting will include information in relation to:

(a) The independent operation of the teams conducting assessment of Apple's App Store search algorithm on a bi-annual basis.

(b) The data inputs into, Apple's App Store search algorithm on a bi-annual basis, and the objectives of the search algorithm on an annual basis.

(c) Complaints collected through the dedicated channel referred to in paragraph 3(d) as it relates to App Store organic search and the presentation of results on a bi-annual basis.

Third-Party Data Use in App Review

Background

Apple has never sought to use the App Store, nor the data it holds by virtue of running the App Store, as a means to develop competing features and services. Apple will maintain robust safeguards for non-public data that developers submit as part of App Review. This will include data mapping, tagging, access controls, data use policies, and mandatory internal training.

These protections ensure that all third-party data is identified and tagged as such and access to tagged datasets is restricted and only granted subject to a formalised review process (which includes review by legal compliance personnel). They are designed to ensure that third-party data is not used by Apple to compete with such third parties.

Apple has set out below targeted measures it is prepared to enter into to address the concerns that Apple understands the CMA is seeking to address.

Commitments

(1)   Apple will maintain processes aimed at safeguarding third-party data submitted as part of App Review, specifically:

     (a)   **Tagging**: Tagging developer data submitted as part of App Review as third-party data within Apple's data mapping framework, ensuring that it is subject to the corresponding access restrictions and safeguards.

     (b)   **Restricting access**: Any access to this data will require legal review to confirm the business purpose and verify that the intended use does not create a risk of Apple competing with the developers whose data is involved. Access will remain restricted to defined user groups, granted on a need-to-know basis, and withdrawn when no longer required.

     (c)   **Monitoring access**: Apple will log and monitor access to this data, including changes in access rights, to support internal oversight and to verify that access controls operate as intended.

     (d)   **Technical controls**: Apple will ensure that appropriate technical controls, such as access restriction and removal, are in place.

     (e)   **Training**: Apple will provide mandatory training to relevant personnel on the rules governing access to and use of developer data submitted as part of App Review.

(2)   Apple does not interpret, and will not apply, Developer Program License Agreement Section 9.3 in any way that would undermine the protections and processes it has documented in these commitments to safeguard third-party data.

Transparency

(3)   Apple is committed to demonstrating on an ongoing basis that it provides strong protections for data submitted as part of App Review process. To this end, Apple will commit to:

(a)   Offering several channels of support for developers to communicate directly with Apple should they have any concerns over Apple's use of non-public developer data submitted via App Review, including the developer portal, Feedback Assistant, Report a Concern, and Worldwide Developer Relations.

(b)   Setting up and maintaining a dedicated channel to receive complaints from UK developers on its commitments relating to the CMA's stated concerns, including those relating to third-party data use in App Review.

(c)   Provide an annual public statement confirming that Apple:

(i)   Has maintained these processes to safeguard the relevant data.

(ii)   Conducts regular internal evaluations of its practices.

(iii)   Submits a summary of the findings of these evaluations to the CMA.

Compliance and Monitoring

(4)   Apple will provide additional, more detailed, and confidential information to the CMA, on a bi-annual basis, to assist it in monitoring compliance and the effectiveness of these commitments. This will include information relating to:

(a)   Findings of tests and evaluation reports referred to in paragraphs 3(c)(ii) and (iii).

(b)   Complaints collected through the dedicated channel referred to in paragraph 3(b) as it relates to third-party data use in App Review or use of data collected through the operation of the App Store.

<u>Interoperability</u>

Background

Apple incorporates developer feedback from multiple formal and informal channels, including requests for interoperability. These channels include Feedback Assistant, AppleCare, a dedicated Developer Relations team, and Apple's annual Worldwide Developer Conference.

Apple also maintains comprehensive developer documentation about the software tools, frameworks, APIs, and technologies it makes available for developers to incorporate into their apps. This includes detailed information about the relevant software, tutorials, and sample code, all of which is made easily accessible online and directly from Apple's development tools such as Xcode. To complement these feedback channels and documentation, Apple routinely holds developer workshops, including in London for UK developers.[6]

Apple has set out below targeted measures it is prepared to take to address the concerns that Apple understands the CMA is seeking to address.

Commitments

(1)   Apple will launch a dedicated interoperability feedback channel for developers to submit interoperability requests to Apple.

   (a)   The feedback channel will consist of a web-based guided questionnaire.

   (b)   The feedback channel will be available to developers that are members in good standing of the Developer Program and whose account membership with the Developer Program is registered in the UK ("**Eligible Developers**").

   (c)   Eligible requests received through the feedback channel will be placed in a dedicated internal queue for timely review. Incoming requests will be reviewed by a team with specific expertise in iOS and iPadOS interoperability and platform integrity, as well as general technical knowledge of iOS and iPadOS architecture and technologies. Requests will be reviewed in the order they are received, regardless of the Eligible Developer's size or identity. Apple will endeavour to provide developers with an update on the status of their requests within four weeks of receiving them.

   (d)   The team that will review incoming requests has no role in relation to developing Apple's services and Apple commits not to use for competitive purposes any competitively sensitive information accessed during the review process. Internal systems used to review requests will be restricted by what are known as "components" and not be accessible outside the responsible teams. Any Eligible

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[6]   *See* Apple Developer, <u>Meet with Apple </u>(16-17 December 2025). *See* also Apple Developer, <u>Meet with Apple</u> (15 December 2025).

Requests that Apple decides to build will be shared with other teams on a need-to-know basis only following the removal of any competitively sensitive information.

(e)   Apple will inform developers of the outcome of its review of their requests, and the associated reasoning for this outcome. Eligible Developers will be able to contact Apple about their request at any time while Apple is reviewing the request. Apple will also provide a dedicated compliance email address that Eligible Developers can use to raise concerns about the process, if any.

(f)   Apple will inform developers generally about forthcoming changes to iOS and iPadOS, including those resulting from eligible requests, in its beta releases.

(2)   Apple will publish the substantive criteria against which it assesses interoperability requests.

(a)   Apple will make clear the kinds of requests that are eligible for consideration under the feedback channel, namely requests for access to equivalent system and hardware functionality used by Apple services or accessories. Apple will continue to assess ineligible requests through its existing feedback channels, and will report on ineligible requests (*i.e.*, requests that are submitted through the dedicated feedback channel but deemed ineligible) as part of Apple's reporting under paragraphs (3) and (4) below. Apple will inform developers if a request submitted through the feedback channel is deemed ineligible and therefore has been moved to existing feedback channels.

(b)   Apple will assess eligible requests against the following set of criteria: (i) expected user and developer uptake; (ii) alignment with Apple's platform priorities; (iii) potential implementation costs; (iv) potential impact on user experience, performance/battery, security, safety, privacy, integrity, and accessibility; and (v) potential impact on Apple's intellectual property rights.

(c)   Receiving a request through the feedback channel will not create any obligation or expectation that Apple will commit to building a specific requested feature (or, if Apple does choose to build a requested feature, whether or not it will make it available to the Eligible Developer or developers generally for a fee), which will remain at Apple's discretion in line with its commercial strategy and priorities.

Transparency

(3)   Apple will publish an annual dedicated transparency report.

(a)   The report will cover requests from Eligible Developers.

(b)   The report will include an overview of the requests received in the past year and report on certain key performance indicators relating to eligible requests

reflecting the CMA's objective of transparency (*e.g.*, the number of requests received, most requested functionalities, and the timing of their consideration).

(c)   The report will focus on Apple's commitment to and activities in the UK, and will be published once per year each summer.

(d)   The report will include a high-level overview of third-party requests that Apple has incorporated into its feature development cycle.

(4)   Apple will publish an annual public statement confirming that it:

(a)   Has maintained a dedicated interoperability channel for developers to submit interoperability requests to Apple.

(b)   Has maintained its overall process, including an internal queue process where requests are reviewed in the order they are received.

(c)   Believes its substantive assessment criteria remains appropriate.

Compliance and Monitoring

(5)   Apple will provide additional, more detailed, and confidential information to the CMA, on a bi-annual basis, to assist it in monitoring compliance and the effectiveness of these commitments. This reporting will include:

(a)   Information on developer requests and rejections.

(b)   Information on ineligible requests and the reasons why Apple considered any requests ineligible.

(c)   Information on complaints collected through the dedicated channel referred to in paragraph 1(e) as it relates to interoperability, including a summary of the complaint and how it was addressed by Apple.

(d)   Statistics on review time for eligible and ineligible requests.

(e)   Timely notification of changes to the criteria for assessing interoperability requests received through the feedback channel.

(f)   Timely notification of material changes to the feedback channel.