Code of Practice on Disinformation – Report of NewsGuard for the period January 1, 2024–December 31, 2024

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Executive summary

In June 2022, NewsGuard signed onto all the Code of Practice's measures that are relevant to its services, committing to maintain its journalistic practices, which include an independent, unbiased, and apolitical approach; full transparency on its methodology; and providing publishers a 'right to be heard' by calling for comment when publishers are deemed to fail certain criteria. Furthermore, NewsGuard also committed to continue to strengthen its media-literacy efforts with public libraries and schools to help users develop their critical thinking and online awareness through its browser-extension tool.

Here is a summary of how we implemented our commitments in 2024.

1. EMPOWERING USERS

NewsGuard's Reliability Ratings are based on nine apolitical and basic journalistic criteria that assess the credibility and transparency of a news or information site. Our nine criteria are applied equally to all news sites, regardless of their size or political orientation — from mainstream media outlets to small blogs — while allowing all sites to exercise their right to be heard.

Our criteria are basic journalistic principles and are inherently apolitical. They are also completely transparent and <u>explained</u> in great detail on our website in several languages spoken in the EU (namely English, French, German and Italian) along with the relative weighting of each criterion, depending on its importance.

Our rating process is designed to ensure our criteria are applied in an unbiased manner. After an analyst produces a first rating, with an associated Nutrition Label explaining in detail why he or she arrived at such a rating, the analysis is edited by at least two editors. Then, if any doubt remains about how to apply a specific criterion, the rating is discussed during a full staff meeting hosted by our two co-CEOs and co-Editors-in-Chief, Steven Brill and Gordon Crovitz. Over the years, this process has led NewsGuard to assign high ratings and poor ratings to sites of all political leanings. To ensure fairness, publishers are also put at the center of our rating process and given a chance to comment whenever our team flags an issue with the credibility or transparency of their site. We believe this publisher right of reply is fundamental to fair and accurate ratings.

For the sake of accountability, readers can see the credentials and backgrounds of everyone responsible for every NewsGuard Reliability Rating and Nutrition Label that they read. Because our tools are meant to empower users so that they can make informed decisions on which sources to trust and which to be wary of, we also allow users to submit suggestions of sources to rate, if we have not yet rated them, and to send feedback on existing ratings. All inbound messages are reviewed by our team.

Finally, to ensure complete independence, we accept no fees from news websites to rate them. Our revenue comes from license fees that platforms, ad agencies, brands, media monitoring companies, AI companies, government entities and researchers — among other groups — pay to use our data. News consumers are able to access NewsGuard ratings through our licensees (such as Microsoft which provides it for free through its Edge browser) as well as directly from NewsGuard. Companies providing internet browsers, search, social media and other services make our ratings available to their users to empower them with information about the nature of news sources they see online. Individuals can also subscribe to our ratings through a browser extension and mobile version. At a time when generative AI models often "hallucinate" and create and spread misinformation

about topics in the news, NewsGuard data also protects news consumers when they use large-language models, and provide product teams and trust & safety teams within generative AI companies with protections to ensure that their AI systems are reliable and that risks are mitigated. This protects news consumers from being confronted to misinformation in AI responses to prompts and also prevents malign actors running disinformation operations, including for the governments of Russia, China and Iran, from abusing AI models to spread their narratives and inundate the responses of Western chatbots.

In 2024, NewsGuard also provided its media literacy browser extension for free to approximately 200 public libraries in the EU (in Italy, France, Germany and Slovenia) helping thousands of patrons navigate the internet more safely and access additional information and context on the sources of news and information they encounter online.

From January 1, 2024 to December 31, 2024, NewsGuard participated in several media literacy seminars, awareness-raising events, and discussions with misinformation and disinformation experts in the following EU countries: Belgium, Bulgaria, Cyprus, France, Germany, Greece, Ireland, Italy, Portugal, Romania, Slovenia, Spain and Sweden. These events reached a total of approximately 5,900 participants, including educators and librarians who in turn could reach hundreds of students and library users.

2. SUPPORTING TRUSTWORTHY JOURNALISM AND DEMONETIZING DISINFORMATION

NewsGuard's brand safety service, BrandGuard, enables brands to invest in ad inventory on high quality news sites that publish trustworthy journalism — and avoid placing ads on websites that repeatedly publish misinformation, state-sponsored propaganda or unreliable news. BrandGuard offers multiple "inclusion" and "exclusion" list options for advertisers, enabling each brand to tailor its approach to advertising on news to account for its values and risk tolerance while enforcing the publisher's right to be heard.

BrandGuard's inclusion and exclusion lists are based entirely on NewsGuard's Reliability Ratings of news and information websites, which are compiled by a team of experienced journalists and editors based on nine apolitical journalistic criteria. Based on the criteria, each publisher receives an overall rating level ranging from "High Credibility" to "Credible with Exceptions" to "Proceed with Caution," along with a 0-100 reliability score and an assessment on each of the nine criteria. Our rigorous rating process is explained in great detail on our website, on a page called "Website Rating Process and Criteria" (which is available in several EU languages: English, French, Italian and German.) As the page describes, our process is transparent and accountable to everyone involved — including publishers, advertisers, and the general public. Each criterion is defined in significant detail, with numerous examples of how a publisher would pass or fail the criterion. Each site's score is derived entirely from our assessments of those criteria, which are each assigned a specific number of points as outlined on our website. For each rating, we provide a detailed written Nutrition Label report that explains why NewsGuard made its determination on each of the criteria, provides evidence and examples to back up its assessments, and includes any relevant comments from the publisher. Before publishing a rating or update, we always seek feedback from publishers that fail any of our criteria. We hold ourselves to the same standards we expect of the websites we rate, which means transparently conducting responsible journalism and allowing publishers to exercise their right to reply. Each assessment of a website is made public via NewsGuard's browser extension, which is available for public subscription, and is personally sent to each publisher evaluated. NewsGuard subscribers and rated publishers can read NewsGuard's detailed analyses, called "Nutrition Labels,"

which explain why NewsGuard made its determination on each of the criteria, provide evidence and examples to back up its assessments, and include any relevant comments from the publisher. Additionally, we also invite publishers who disagree with our rating to provide feedback <u>on a</u> <u>dedicated page of our website.</u>

This transparent process is documented on <u>NewsGuard's website</u> and in our Nutrition Labels, and allows publishers not only the right of reply — but also an opportunity to improve. More than 2,230 websites rated by NewsGuard have taken steps to improve editorial practices after being contacted by our team during the rating process — resulting in improved ratings and scores and, in some cases, leading advertisers to monetize their websites.

To ensure our process remains strictly apolitical, NewsGuard relies on apolitical criteria when rating a site (e.g. a corrections policy cannot be partisan, as there is no conservative or progressive way to regularly publish corrections) and carries out a manual and rigorous editing process involving approximately five journalists and editors per website rating, ensuring no rating is the assessment of a single person. The most debated analyses undergo a final review step in which it is shared with the full team of NewsGuard analysts, including the two co-CEOs, to raise any issues and ensure consistency.

3. EMPOWERING THE RESEARCH COMMUNITY

As a member of the Italian Digital Media Observatory since 2021, NewsGuard regularly publishes its content and analysis on disinformation in Italy and in Europe on IDMO's <u>portal</u>, contributing to the consortium's media literacy efforts.

NewsGuard has various partnerships and collaborations with research institutions and universities that study disinformation, such as La Sapienza University in Rome, Ca' Foscari University in Venice, Carlo Bo University in Urbino, University of Salerno, the European University Institute in Florence, the Italian National Research Council, Tilburg University in The Netherlands, Stockholm University in Sweden, the university of Bamberg in Germany and the German Max-Planck-Insitute. In 2024, NewsGuard's team produced regular newsletters called Reality Check covering misinformation, disinformation, and false news online with exclusive data from nine countries including four Member States (France, Italy, Austria, and Germany). NewsGuard also published Misinformation tracking centers on the year's most notable news events, to monitor the false claims they generated, and document their origin and spread. These included a 2024 U.S. Election Misinformation Tracker, a 2024 European Parliamentary Elections Misinformation Tracking Center, and a 2024 Paris Olympics Misinformation Tracking Center.

Our previous tracking centers on Israel-Hamas War Misinformation, Russia-Ukraine War Disinformation and on AI-enabled Misinformation were also regularly updated throughout the year. These reports are distributed in all the countries NewsGuard operates in and are available for free on NewsGuard's website in English, French, Italian, and German. NewsGuard also continues to publish a State-Sponsored Disinformation Risk Briefing focused on hostile information operations by the governments of Russia, China and Iran targeting citizens in the EU and other democracies, which is provided to officials in the European Commission and in other European government entities to assist their work.

NewsGuard also regularly publishes <u>Special Reports</u> on disinformation focusing on different topics, trends, and platforms (9 in total in 2024), in addition to a monthly audit of the top 10 chatbots, which we started publishing in July 2024 (6 in total in 2024, including one testing responses in French.)

NewsGuard's <u>white paper</u>, "Fighting Misinformation with Journalism, not Algorithms," which is updated regularly and published on our website, outlines independent research on the effect of using human-curated news reliability ratings to mitigate false news, some of which has been conducted by leading academic institutions and other top scholars using NewsGuard's Reliability Ratings dataset.

Guidelines for filling out the report

Reports are detailing how signatories have implemented their Commitments under the Code and signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code's Commitments and Measures by each signatory.

Reporting period

The reporting period to be covered in the reports is 12 months (edit reporting period) for signatories who are not offering very large online platform services. Signatories shall submit reports outlining policy updates and actions taken to implement the Commitments and Measures they signed up to under the Code. All data and policy updates should be reported for 12 months period from the submission of last reports.

Adjusting the reporting template

Signatories who are not offering very large online platform services can adapt the template to specific commitments and measures they subscribed to. This may include adapted wording for commitments, measures, QREs and SLIs. Relevant signatories will report only on commitments and measures they subscribed to and provide Member State-level data only if feasible.

Reporting per Service

When filling in a report for several services, use colour codes to clearly distinguish between services. At the beginning of the report, clarify what colour is used for which service.

Reporting in text form

Reporting in the form of written text is required for several parts of the report. Most of them are accompanied by a target character limit. Please stick to the target character limit as much as possible. We encourage you to use bullet points and short sentences. When providing information to the QRE, please make sure that your answer covers all the elements of the associated commitment and measure. Links should only be used to provide examples or to illustrate the point. They should not be used to replace explanations or to provide data in the forms. All relevant explanations and data must be included in the report directly, in written form.

Reporting SLIs and data

Reporting on SLIs requires quantitative information to be reported on in this harmonised reporting template.

- Where relevant and feasible, SLIs should be reported on per Member State.
- If no data is available on Member State level, SLIs might, instead, be exceptionally reported on per language. (NB that signatories agreed to revisit this issue after the first reporting, to ensure harmonised and meaningful reporting.)
- Please report data in the format provided by the harmonised reporting template, not through external links. Please use the Member State/language template provided in the harmonised reporting template. Where the table asks for "Other relevant metrics", please name the metric that you would like to report on in addition to the ones already provided. You may include more than the number of additional fields provided where necessary; in that case, please adjust the table as needed.
- Please contextualize all data as much as possible, i.e. include baseline quantitative information that will help contextualize the SLIs (e.g. number of pieces of content labelled out of what volume of content).
- If there are no relevant metrics to report on, please leave the respective columns blank.

Reporting on TTPs

If subscribed to Commitment 14, Integrity of Services, we ask you to report on each identified TTP individually. The number of identified TTPs may vary per service. Where more than one TTP are reported under the same action, clarify the reasoning in the methodology. Where input is not provided, keep the placeholder for the relevant TTP and explain reasons and planned remedial action. Additionally, as with all other SLIs, data can be provided per Member State for each individual TTP.

Missing Data

In case that at the time of reporting there is no data available yet, the data is insufficient, or the methodology is lacking, please outline in the dedicated field (i.e. in the field about further implementation measures planned) how this will be addressed over the upcoming six months, being as specific as possible.

Signatories are encouraged to provide insights about the data/numbers they provide by inserting possible explanations in the boxes of the template "*Methodology of data measurement & insights on data provided*". This should aim to explain the why of what is being reported, for instance - *Are there trends or curiosities that could*

require or use contextual explanation? What may be driving the change or the difference in the number? Please also indicate inconsistencies or gaps regarding methodology in the dedicated box.

Attachments

We ask you not to enclose any additional attachments to the harmonised reporting template.

Crisis and elections reporting template

Relevant signatories are asked to provide proportionate and appropriate information and data during a period of crisis and during an election. Reporting is a part of a special chapter at the end of the harmonised reporting template and should follow the guidelines:

- The reporting of signatories' actions should be as specific to the particular crisis or election reported on as possible. To this extent, the rows on "Specific Action[s]" should be filled in with actions that are either put in place specifically for a particular event (for example a media literacy campaign on disinformation related to the Ukraine war, an information panel for the elections), or to explain in more detail how an action that forms part of the service's general approach to implementing the Code is implemented in the specific context of the crisis or election reported on (for example, what types of narratives in a particular election/crisis would fall into scope of a particular policy of the service, what forms of advertising are ineligible).
- Regarding elections, signatories are expected to provide specific information on their experience with the RRS for FR and RO elections. This can be included in the first two rows ("Threats observed..." / "Mitigations in place ..."). In addition, regardless of the RRS activation, signatories should report on relevant actions in place for elections at national level (parliamentary/presidential) in EU Member States during the reporting period specifying the country(ies) and election(s).
- Signatories who are not offering very large online platform services and who follow the invitation to report on their specific actions for a particular election or crisis may adapt the reporting template as follows:
 - They may remove the "Policies and Terms and Conditions" section of the template, or use it to report on any important changes in their internal rules applicable to a particular election or crisis (for example, a change in editorial guidelines for fact-checkers specific to the particular election or crisis)
 - o They may remove any Chapter Section of the Reporting Template (Scrutiny of Ads Placement, Political Advertising, Integrity of Services etc.) that is not relevant to their activities
- The harmonised reporting template should be filled in by adding additional rows for each item reported on. This means that rather than combined/bulk reporting such as "Depending on severity of violation, we demote or remove content based on policies X, Y, Z", there should be individual rows stating for example "Under Policy X, content is demoted or removed based on severity", "Under Policy Y, content [...]" etc.
- The rows should be colour-coded to indicate which service is being reported on, using the same colour code as for the overall harmonised reporting template.

Reporting should be brief and to the point, with a suggested character limit entry of 2000 characters.

Uploading data to the Transparency Centre

The reports should be submitted to the Commission in the form of the pdf via e-mail to the address CNECT COP TASK FORCE <u>CNECT-COP-TASK-FORCE@ec.europa.eu</u> within the agreed deadline. Signatories will upload all data from the harmonised reporting template to the Transparency Centre, allowing easy data access and filtering within the agreed deadline. It is the responsibility of the signatories to ensure that the uploading takes place and is executed on time. Signatories are also responsible to ensure that the Transparency Centre is operational and functional by the time of the reports' submission that the data from the reports are uploaded and made accessible in the Transparency Centre within the above deadline, and that users are able to read, search, filer and download data as needed in a user-friendly way and format.

II. Scrutiny of Ad Pla	cements
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Commitment 1

Relevant signatories participating in ad placements commit to defund the dissemination of disinformation, and improve the policies and systems which determine the eligibility of content to be monetised, the controls for monetisation and ad placement, and the data to report on the accuracy and effectiveness of controls and services around ad placements.

or controls and services around ad placements.				
Measure 1.6	Relevant Signatories will advance the development, improve the availability, and take practical steps to advance the use of brand safety tools and			
	partnerships, with the following goals:			
	- To the degree commercially viable, relevant Signatories will provide options to integrate information and analysis from source-raters, services that			
	provide indicators of			
	trustworthiness, fact-checkers, researchers or other relevant stakeholders providing			
	information e.g., on the sources of Disinformation campaigns to help inform decisions on ad placement by ad buyers, namely advertisers and their			
	agencies.			
	- Advertisers, agencies, ad tech companies, and media platforms and publishers will take effective and reasonable steps to integrate the use of brand			
	safety tools throughout the media planning, buying and reporting process, to avoid the placement of their advertising next to Disinformation content			
	and/or in places or sources that repeatedly publish Disinformation.			
	- Brand safety tool providers and rating services who categorize content and domains will provide reasonable transparency about the processes they			
	use, insofar that they do not release commercially sensitive information or divulge trade secrets, and that they establish a mechanism for customer			
	feedback and appeal.			
	NewsGuard's brand safety service, BrandGuard, enables brands to invest in ad inventory on news sites that publish trustworthy journalism, and avoid			
	placing ads on sites that repeatedly publish mis- or disinformation. BrandGuard offers multiple "inclusion" and "exclusion" list options, enabling brands to			
	tailor their approach to account for their values while enforcing the publisher's right to be heard.			
QRE 1.6.3 Signatories	BrandGuard's inclusion and exclusion lists are based entirely on NewsGuard's Reliability Ratings of news and information websites, which are compiled			
that provide brand	by a team of experienced journalists based on nine apolitical journalistic criteria. Our rigorous rating process is explained in detail on our website, on a			
safety tools will	page called "Website Rating Process and Criteria."			
outline how they are				
ensuring	As the page describes, our process is transparent and accountable to everyone involved-including publishers, advertisers, and the general public. Each			
transparency and	criterion is defined at length, with numerous examples of how a publisher would pass or fail the criterion. For each rating, we provide a written Nutrition			
appealability about their processes and	Label report that explains why NewsGuard made its determination on each of the criteria.			
outcomes.				
	Unlike other brand safety providers that rely on black box algorithms, NewsGuard's journalists contact any publisher that fails any of the nine criteria			
	before publishing a rating. Publishers may address any issues to increase their score or provide comments, which are included in the Nutrition Label			
	report so that advertisers may judge for themselves whether the publisher should be monetized. Once a rating or update is published, we notify			
	websites of their scores so that they are aware of any issues that could lead to their exclusion from an ad inventory.			

	This transparent process allows publishers not only the right of reply – but an opportunity to improve. More than 2,230 websites have taken steps to
	improve editorial practices after being contacted by our team – leading advertisers in some cases to monetize their websites.
QRE 1.6.4 Relevant Signatories that rate sources to determine if they persistently publish Disinformation shall provide reasonable information on the criteria under which websites are rated, make public the assessment of the relevant criteria relating to Disinformation, operate in an apolitical manner and give publishers the right to reply before ratings are published.	NewsGuard's ratings for news websites are based on nine apolitical criteria that assess the website's credibility and transparency. Each criterion is worth a certain number of points out of 100, weighted based on importance. All criteria are pass-fail, meaning that a site either receives all of the points associated with the criterion or receives no points for that criterion, and are applied in a way that ensures a publisher's right to be heard. All of our criteria and the associated points are publicly available <u>on a page of our website called "Website Rating Process and Criteria"</u> that provides a detailed explanation of each criterion and lists examples of reasons that a site might pass or fail this criterion. To ensure our process remains strictly apolitical, NewsGuard relies on apolitical criteria when rating a site and carries out a manual and rigorous editing process involving approximately five journalists and editors per website rating, ensuring no rating is the assessment of a single person. The most debated analyses undergo a final review step in which it is shared with the full team of NewsGuard analysts, including the two co-CEOs, to raise any issues and ensure consistency. Before publishing a rating or update, we always seek feedback from publishers that fail any of our criteria. Each assessment of a website is made public via NewsGuard's browser extension, which is available for public subscription, and is personally sent to each publisher evaluated, when it is published for the first time, and after each update. NewsGuard subscribers and rated publishers can read NewsGuard's detailed analyses, called "Nutrition Labels," which explain why NewsGuard made its determination on each of the criteria, provide evidence and examples to back up its assessments, and include any relevant comments from the publisher. Additionally, we also invite publishers who disagree with our rating to provide feedback <u>on a dedicated page of our website</u> .

V. Empowering Users			
Commitment 17			
In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, Relevant Signatories commit to continue and strengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups.			
Measure 17.2 Relevant Signatories will develop, promote and/or support or continue to run activities to improve media literacy and critical thinking such as campaigns to raise awareness about Disinformation, as well as the T that are being used by malicious actors, among the general public across the European Union, also considering the involvement of vulnerable communities.			
QRE 17.2.1 Relevant Signatories will describe the activities they launch or support and the Member States they target and reach. Relevant signatories will further report on actions taken to promote the campaigns to their user base per Member States	In 2024, NewsGuard participated in numerous media literacy events with journalists, librarians, teachers and citizens on topics ranging from how AI is being used in disinformation campaigns, to spotting unreliable sources. The events took place in several Member States: France, Italy, Bulgaria, Greece, Portugal, and Spain.		
targeted.	Such events have included lessons on misinformation and disinformation for students at Padua University, Luiss University, LUMSA University, Salerno University, and La Sapienza University in Italy but also at the New Bulgarian University (Bulgaria), and at the National & Kapodistrian University of Athens (Greece); classes at		

SLI 17.2.1 - actions enforcing policies above Relevant Signatories report on number of media literacy and awareness raising activities organized and or participated in and will share quantitative information pertinent to show the effects of the campaigns they build or support at the Member State level (for instance: list of Member States where those activities took place; reach of campaigns; engagement these activities have generated; number of interactions with online assets; number of participants).	 the Paris' Interdisciplinary Center for Strategic Studies and for high school pupils in the south of France; and webinars with librarians and school teachers in Italy and France. Throughout the year, NewsGuard was regularly involved in initiatives led by IDMO, the Italian Digital Media Observatory, of which NewsGuard is a member. Our editors have also spoken at conferences to raise awareness on specific issues related to mis- and disinformation, in several Member States, including Belgium, Cyprus, France, Germany, Ireland, Italy, Portugal, Romania, Slovenia, Spain and Sweden. These events included a panel on "Disinformation at the heart of conflicts" at the Military School in Paris, a keynote on the risks of generative AI at Italy's AI week; a panel at the plenary assembly of the Club of Venice on the "Challenges of communicating the EU enlargement and the progress in countering disinformation Fund Summer Conference in Lisbon, Portugal. In 2024, NewsGuard also continued providing its browser extension for free to more than 900 public libraries throughout the world, including approximately 200 public libraries in Italy, France, Germany and Slovenia. In 2024, NewsGuard participated in 15 media literacy seminars and awareness raising events in France, Italy, 				
	educators and librar participated in 41 spe	ians who in turn could	ed a total number of ap I reach hundreds of stu n Italy, France, Belgium O attendees.	dents and library users	s. NewsGuard also
	Nr of media literacy/ awareness raising activities organised/ participated in	Reach of campaigns	Nr of participants	Nr of interactions with online assets	Nr of participants (etc)
15 media literacy seminars and awareness raising events	ITALIAN - January 30, 2024 The risks of generative AI - Seminar for a high school in Portogruaro (Italy)		About 100 students		
	ITALIAN - March 5, 2024 Webinar for librarians in Cuneo (Italy)		About 10 librarians		

ENGLISH – March	About 80 students
8, 2024	
Lecture on	
disinformation for	
Fulbright students	
in Rome (Italy)	
FRENCH – March	4 students
12, 2024	
Class on AI and	
Disinformation at	
the	
Interdisciplinary	
Center on Strategic	
Studies in Paris	
(France)	
FRENCH – March	About 50 pupils
26, 2024	
20, 2024	
Workshops on fake news and	
unreliable sources	
for high school pupils and	
pupils and	
members of the	
public in a local	
public library in	
Agde, as part of the French "Week	
the French "Week	
of the Press"	
(France)	
ITALIAN – April 4,	About 30 students
2024	
The risks of	
generative AI -	
Seminar for a high	
school in Villorba	
(Italy)	
University of	
Athens (Greece)	
ENGLISH – April 11,	About 20 students
2024	About 20 students
Lecture on	
disinformation for	
MA students at the	
New Bulgarian	

	University	
	(Bulgaria)	
	ITALIAN - April 18,	About 120
	2024	employees
	Workshop on	
	Workshop on disinformation for	
	IBM Italian	
	employees (Italy - online)	
	online)	
	ENGLISH – April	About 15 students
	22, 2024	
	Lecture on	
	disinformation for	
	MA students at the	
	National &	
	Kapodistrian	
		Ale suit 20 surgests
	ENGLISH - June 6,	About 20 experts
	2024	
	Lecture on	
	disinformation for	
	Phd students at the	
	European	
	University Institute	
	in Florence (Italy)	
	ITALIAN – June 29,	Abou 20 students
	2024	
	Lesson on	
	Lesson on	
	disinformation for	
	Sociological	
	Sciences master	
	students at the	
	University of Padua	
	(Italv)	
	ITALIAN -	About 15 students
	November 5, 2024	
	Lecture on	
	disinformation for	
	students at the	
	University of	
	Salerno (İtaly)	
	ITALIAN -	About 30 students
	November 19,	
	2024	
1	1	

	Lecture on		
	disinformation for		
	students at LUMSA		
	University in Rome		
	(Italy)		
	ITALIAN -	About 20 students	
	December 6, 2024	About 20 students	
	Lecture on		
	disinformation for		
	students at La		
	Sapienza		
	University (Italy)		
	ITALIAN -	About 15 students	
	December 16, 2024		
	Lecture on		
	disinformation for		
	students at Luiss		
	University - School		
	of Journalism (Italy)		
41 speaking engagements	FRENCH - January	About 450 people	
	29, 2024		
	"Disinformation at		
	the heart of		
	conflicts". Panel		
	discussion		
	organized by the Institut des hautes		
	Institut des hautes		
	études de défense		
	nationale (IHEDN)		
	at the French		
	Military School in		
	Paris. (France)		
		Alcourt 50 mm	
	ITALIAN - February	About 50 people	
	21, 2024		
	Italian Digital		
	Media Observatory		
	1 closing event		
	(Italy)		
	ENGLISH -	About 25 people	
	February 21, 2024		
	EUMEPLAT Round		
	Table on		
	Disinformation.		
	"European Media		

Platforms:	
Assessing Positive	
and Negative	
Externalities for	
European Culture"	
(Belgium)	
FRENCH – March	About 10 people
20, 2024	About to people
Presentation of	
NewsGuard, and	
how we work to	
restore trust in the	
age of AI before a	
working group on	
freedom of the	
press of	
Paris-based think	
tank Villa Numeris	
(France – online)	
FRENCH – March	About 50 people
25, 2024	
Panel called	
"Disinformation	
and foreign	
interference: are	
we ready for the	
EU elections?"	
organized by the	
European think	
tank	
Confrontations	
Europe (France)	
GERMAN -	About 80 people
February 19, 2024	
Panel presentation	
at DataZulu's	
at DataZulu S	
Business Breakfast	
about brand-safe	
advertising: "News	
or Fake News:	
Safety through	
transparent	
credibility ratings"	
(Germany)	

ITALIAN – April 10,	About 1500 people
2024	
Al week in Italy -	
Keynote on the	
risks of generative	
Al (Italy)	
GERMAN - April	About 120 people
23, 2024	
Webinar organized	
by Datazulu:	
"Brand Safety in an	
election year: How	
European	
European	
Advertisers can	
capitalise on news	
while mitigating	
risk" (Germany -	
online)	
GERMAN – April	About 20 people
25, 2024	
"How advertisers	
and publishers can	
implement their	
media planning	
and marketing	
campaigns more	
responsibly" -	
Panel discussion at	
the Digital	
Distillery event in	
Hamburg.	
(Germany)	
ENGLISH – April	About 50 people
26, 2024	
Club of Venice	
Plenary Assembly	
- Challenges of	
communicating the	
EU enlargement	
and the progress in	
countering	
disinformation	
(Slovenia)	
(Slovenia)	

ITALIAN – April 29,	About 100 people
2024	
Training course for	
journalists	
organized by the	
Italian Association	
of Journalists (Italy)	
ENGLISH – May 10,	About 30 people
2024	
Presentation at the	
European	
Association of	
Daily Newspapers	
in Minority and	
Regional Annual	
General Assembly	
(Demeral Assembly	
(Romania)	
ENGLISH - MAY	About 350 people
23, 2023	
"Is Generative Al	
Feeding the Fake	
News Machine?" –	
Panel at the	
Vivatech	
conference in Paris	
(France)	
ENGLISH - May 23,	About 45 people
2024	
Club of Venice	
Plenary Assembly	
- "The Challenge of	
European Public	
Communication.	
Synergies in the	
fight against	
fight against	
disinformation and	
media literacy"	
(France - online)	
ITALIAN – May 27,	About 50 people
2024	
"Disinformation	
about the EU	
elections" – Panel	
	i i i i i i i i i i i i i i i i i i i

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organized by	
Media 2000 (Italy)	
FRENCH – May 30,	About 100 people
2024	
"Fighting	
"Fighting disinformation:	
from the	
vulgarisation to the	
political and	
economic	
challenges", panel	
organized by the	
think tank	
CyberCercle	
Auvergne-Rhône-	
Alpes, in Lyon	
(France)	
ENGLISH – June 3,	About 25 people
2024	
"Disinformation	
storm. Managing	
the unmanageable"	
Danal arganizad	
- Panel organized	
by the European	
Council on Foreign	
Relations (Italy)	
FRENCH – June 6,	About 100 people
2024	
"False claims: a	
positive	
communication?",	
panel discussion at	
the annual	
congress of the	
French Hospital	
Federation in	
Bourgogne	
(France)	
ENGLISH – June 10,	About 100 people
2024	
"Digital literacy of	
citizens to combat	
disinformation",	
organized by Luiss	

University and	
Repubblica Digitale	
(Italy)	
ITALIAN – June 13,	About 60 people
2024	
Journalism Festival	
in Ronchi dei	
Legionari - Panel	
on AI – (Italy)	
ENGLISH - June	About 25 people
20, 2024	
Club of Venice	
Plenary Assembly	
– "Digital	
innovation and	
capacity building:	
challenges and	
opportunities for	
governmental and	
governmentaranu	
institutional "	
communicators"	
(Dublin - online)	
ENGLISH – June	About 40 people
20, 2024	
Barcelona	
Concentrix Panel:	
European Spring	
Trust & Safety	
Meet-up. Panel	
about Election	
Integrity (Spain)	
ENGLISH – June 26,	About 15 people
2024	
"Information	
disorder in time of	
elections: insights	
from the 2024	
European	
Elections" - Panel	
organized by the	
European	
Commission in	
Italy (Italy)	

ENGLISH – July 15,	About 100 people
2024	
Presentation at the	
European Media	
and Information	
Fund (EMIF)	
Summer	
Conference 2024	
(Portugal)	
ITALIAN – August	About 50 people
21, 2024	About 50 heoble
ZI, ZUZ4	
Panel discussion at	
Rimini Congress	
organized by the Italian Ministry of	
Italian Ministry of	
Foreign Affairs	
(Italy)	
ITALIAN -	About 100 people
September 5, 2024	
"The new mission	
of public libraries"	
- Panel organized	
by Forum Cultura	
by Forum Cultura in Milan (Italy)	
ENGLISH -	About 300 people
September 27, 2024	
Keynote "A	
presentation "Al	
and disinformation:	
hype or reality?" at the Paris XYZ	
the Paris XYZ	
conference titled	
"GEN AI	
TRANSFORMATIO	
N: PRODUCTIVITY	
& GROWTH."	
(France)	
TALIAN -	About 100 people
September 28,	
2024	
Wired Next	
Festival 2024 (Italy)	

	FRENCH – October	About 150 people
	8, 2024	
	Online	
	participation in a	
	panel called	
	"Influence	
	operations and	
	information	
	manipulation: what	
	stakes for 2024,	
	super electoral	
	year?" - at the	
	Strategic	
	Mediterranean	
	Dialogue in Toulon	
	(France)	
	FRENCH - October	About 100 people
	11, 2024	
	II, 2024 Danal an deenfakee	
	Panel on deepfakes at the	
	"Rendez-vous de	
	l'Histoire de Blois",	
	in Blois (France)	
	ITALIAN - October	About 60 people
	12, 2024	
	Presentation at	
	CICAP (Italian	
	Committee for the	
	Control of Claims	
	on	
	Pseudosciences)	
	Festival (Italy)	
	ITALIAN - October	About 50 people
	16, 2024	
	Panel discussion at	
	the FORUM PA	
	(Public	
	Administration) -	
	Rome (Italy)	
	ITALIAN - October	About 400 people
	19, 2024	
	TEDX Talk (Italy)	
		About 100 months
	ENGLISH -	About 100 people
1	October 23, 2024	

	Panel discussion at	
	the FIBEP	
	(Fédération	
	Internationale des	
	Bureaux d'Extraits	
	de Presse) – World	
	Media Intelligence	
	Congress (Cyprus)	
	FRENCH -	About 50 people
	November 6, 2024	
	"The fight against	
	disinformation, a	
	strategic pillar for	
	organizations in the	
	digital age", Panel	
	organized by the	
	organized by the think tank	
	CyberCercle	
	Auvergne-Rhône-	
	Alpes, in Lyon	
	(France)	
	ENGLISH -	About 40 people
	November 14, 2024	
	Presentation at the	
	FOJO Annual	
	Conference,	
	Linnaeus	
	University	
	(Sweden)	
	ITALIAN -	About 50 people
	November 20,	
	2024	
	Generative Al	
	week (Italy -	
	online)	
	FRENCH -	About 100 people
	November 22,	
	2024	
	"Information,	
	Disinformation and	
	Democracies",	
	Panel at the 2024	
	European Cyber	
1		

	Week, in Rennes				
	(France)				
	ENGLISH -		About 60 people		
	December 5, 2024				
	"Beyond borders:				
	shaping the future				
	of security" - Panel				
	organized by LUISS				
	University and				
	IDMO (Italy)				
	ENGLISH -		About 100 people		
	December 6, 2024				
	"Capacity building				
	in Artificial				
	Intelligence" - Club				
	of Venice Plenary				
	Assembly (Italy)				
	ENGLISH -		About 80 people		
	December 12, 2024				
	"The Hidden				
	Threats of a Digital				
	Age organized by				
	the Italian Ministry				
	of Foreign Affairs" -				
	G7 Strategic				
	Dialogue (Italy)				
Measure 17.3		e Measures, and in ord	er to build on the expe	ertise of media literacy	experts in the design.
				atories will partner or o	
				s Media Literacy Experi	
			untry-specific branche	es, or relevant Member	State universities or
	organizations that have				
QRE 17.3.1 Relevant Signatories will describe how they involved	Through the Italian D	igital Media Observato	ory's <u>portal</u> , NewsGuar	d regularly makes its c	ontent and analysis
and partnered with media literacy experts for the purposes of all	on disinformation in I	taly and in Europe put	olic, contributing to the	e consortium's media li	teracy efforts.
Measures in this Commitment.		<i>,</i> , , , , , , , , , , , , , , , , , ,	0		,
	NewsGuard has varic	ous partnerships and c	ollaborations with rese	earch institutions and u	niversities that study
				ri University in Venice,	
				in Florence, the Italian	
				sity in Sweden, the univ	versity of Bamberg in
	Germany and the Ger	rman Max-Planck-Inst	itute.		
	A 2024 study publish	ed in the "Journal of Q	uantitative Descriptior	n: Digital Media" exami	ned the use of
				-authored by research	

University of Vienna, the Medical University of Vienna, and RWTH Aachen University—concluded that NewsGuard has become the most widely used and comprehensive dataset in this space, using a rigorous and transparent methodology, without exhibiting any political bias.
NewsGuard's Reliability Ratings are also integrated into Microsoft Search Coach, a free app in Microsoft Teams that helps educators and students produce effective queries and identify reliable resources when conducting online research. Search Coach is available globally in 38 different languages.

V. Empowering Users			
	Commitment 22		
Relevant Signatories commit to provide users with tools to help them make more informed decisions when they encounter online information that may be false or misleading, and to facilitate user access to tools and information to assess the trustworthiness of information sources, such as indicators of trustworthiness for informed online navigation, particularly relating to societal issues or debates of general interest. [change wording if adapted]			
Measure 22.4	Relevant Signatories providing trustworthiness indicators will ensure that information sources are being reviewed in a transparent, apolitical, unbiased, and independent manner, applying fully disclosed criteria equally to all sources and allowing independent audits by independent regulatory authorities or other competent bodies.		
QRE 22.4.1 Relevant Signatories will provide details of the basic criteria they use to review information sources and disclose relevant safeguards put in place to ensure that their services are apolitical, unbiased, and independent. They will provide examples of how these are applied equally to a representative range of different publishers. Each analysis will indicate who contributed to assessing the source, or which certification body assessed the source.	Our ratings are based on nine apolitical and basic journalistic criteria that refer to the credibility and transparency of a news or information site. Our nine criteria are applied equally to all news sites, no matter their size or political orientation, from mainstream media outlets to small blogs, while allowing all sites to exert their right to be heard. Our criteria are basic journalistic principles and are inherently apolitical. They are also completely transparent and <u>explained</u> in great detail on our website, along with the relative weighting of each criterion, depending on its importance.		
	Our rating process is designed to ensure our criteria are applied in an unbiased manner. After an analyst produces a first rating, with an associated Nutrition Label explaining in detail why he or she arrived at such a rating, the analysis is edited by at least two editors. Then, if any doubt remains about how to apply a specific criterion, it is discussed during a full staff meeting hosted by our two co-CEOs and co-Editors-in-Chief, Steven Brill and Gordon Crovitz. Over the years, this process has led NewsGuard to assign high ratings and poor ratings to sites of all political leanings.		
	To ensure fairness, publishers are also put at the center of our rating process and given a chance to comment whenever our team flags an issue with the credibility or transparency of their site.		

	 For the sake of accountability, readers can see the credentials and backgrounds of everyone responsible for every NewsCuard Reliability Rating and Nutrition Label that they read. We also allow users to submit suggestions of sources to rate, if we have not yet rated them, and to send feedback on existing ratings. Finally, to ensure complete independence, we accept no fees from websites for rating them. Our revenue comes from license fees that platforms, ad agencies, brands, media monitoring companies, AI companies, and researchers – among other groups – pay to use our data.
Measure 22.5	Relevant Signatories providing trustworthiness indicators will provide compliance and correction mechanisms and respect the right of publishers to be heard, including to engage in the assessment process before indicators are applied and to have their responses available to consumers after assessments are published.
QRE 22.5.1 Relevant Signatories will publish regular corrections on their ratings or indicators if updates or mistakes occur. Relevant Signatories will provide examples of exchanges with publishers, including evidence of this engagement as recorded in trustworthiness indicators, and will regularly update their analysis to reflect any changes in the publications' practices, including any improvement of their practices.	NewsCuard is committed to making clear, prominent corrections of any mistakes that appear in our ratings or Nutrition Labels. Our corrections policy is stated on a dedicated <u>page on our website</u> , which includes a form where users can report possible errors for us to review. The corrections appear as notes at the bottom of the relevant Nutrition Label analyses, making clear what the original error was and how it has been corrected. Publishers can also send requests for corrections and have the opportunity to note any error in our ratings and write-ups when they receive our Nutrition Labels, since we systematically send publishers our initial ratings and updates after they are published, thus enforcing their right to be heard. All of our Nutrition Labels are also regularly updated. We update labels in our database on average once a year, although we update the most engaged websites more regularly (every six months), and also update ratings more frequently if we become aware of a change in the publication's practices. When a site's rating changes because the site has improved its practices, this specific change is described in an editor's note. We also engage in lengthy conversations with publishers to help them understand how they can meet certain criteria and improve their score. For example, in March 2024, Austrian regional news website Unsertirol24.com's score went from 44.5/100 to 62.5/100 after it started labeling press releases more transparently. In December 2024, as the result of engaging with NewsCuard, the staff of Scinexx.de, a German science magazine, added information about its content creators, thus improving its score from 95/100 to 100/100. In December 2024, the score of French right-wing website LaLettrePatriote.com went from 47/100 to 69.5/100 after the site added an Editorial Team page providing a directory of its staff, identified its publishing director, and added clear correction notes in past articles after engaging with NewsGuard.

SLI 22.5.1 - actions enforcing policies above Relevant signatories will report on the total number of instances per Member State where, following a publisher exercising its right to be heard before a rating or updated rating is issued, a rating of untrustworthy changes to a rating of trustworthy.	Total nr of instances when a publisher's rating changed from untrustworthy to trustworthy following a hearing In 2024, 16 websites from our European database (7 French-language, 4 Italian-language, and 5 in German) saw their rating go from untrustworthy (below 60/100) to trustworthy (60/100 and above), including TopSante.com, the website of a French monthly health and wellness magazine that publishes general medical information, and that had advanced unsubstantiated claims about natural remedies in the past.
	All our score changes are recorded internally in the site's rating history, as well as noted in editor's notes at the bottom of each Nutrition Label. Data measurement is therefore easily done by looking at the ratings and updates published in the timeframe concerned. We also record whether sites have responded to our inquiries, and which practice they've improved after engaging with us.
SLI 22.5.2 - actions enforcing policies above Relevant Signatories will report regularly on the number of publishers who have improved their journalistic practices after being assessed on the disclosed criteria and whose conformity, respectively trustworthiness scores thereby improved.	Total nr of publishers who improved their score under the trustworthiness indicatorSince NewsGuard launched in 2018, 2,230 news and information websites around the world (in the E.U. but also in the U.S., Canada, and the U.K.) have improved their journalism practices after engaging with us, increasing their accountability and providing readers with more trustworthy news and information.In 2024, 56 French-language websites, 35 Italian-language websites, and 25 German-language websites improved their NewsGuard ratings.
	All our score changes are recorded in our database and explained in editor's notes at the bottom of each Nutrition Label.

VI. Empowering the research community		
Commitment 29		
Relevant Signatories commit to conduct research based on transparent methodology and ethical standards, as well as to share datasets, research findings and methodologies with relevant audiences.		
Measure 29.1	Relevant Signatories will use transparent methodologies and ethical standards to conduct research activities that track and analyse influence operations, and the spread of Disinformation. They will share datasets, research findings and methodologies with members of the Task-force including EDMO, ERGA, and other Signatories and ultimately with the broader public.	
QRE 29.1.1 Relevant Signatories will provide reports on their research, including topics, methodology, ethical standards, types of data accessed, data governance, and outcomes.	In 2024, NewsGuard launched three new Tracking Centres. Our <u>U.S. Election Misinformation Tracker</u> , covering misinformation surrounding the 2024 U.S. presidential election; our <u>European Parliamentary Elections</u> <u>Misinformation Tracking Center</u> , summarizing and debunking the top election-related myths identified by NewsGuard's team of journalists; and our <u>2024 Paris Olympics Misinformation Tracking Center</u> , tracking the top false narratives about the Games and the websites that were spreading them.	

	 We also regularly updated our <u>AI Tracking Centre</u> highlighting the ways in which generative AI has already been (or could be) deployed to turbocharge misinformation operations. As for our <u>Israel-Hamas War</u> <u>MisinformationTracking Centre</u> and our <u>Russia-Ukraine Disinformation Tracking Center</u>, they catalog all myths about the conflicts, and the websites spreading them. During the year, NewsGuard's team also produced 9 special reports covering misinformation and disinformation on different topics, trends, and platforms, such as: 150 State-Sponsored Articles Blaming the West for the Moscow Terrorist Attack The Fugitive Florida Deputy Sheriff Who Became A Kremlin Disinformation Impresario TikTok Content Farms Use AI Voiceovers to Mass-Produce Political Misinformation Grok AI's New Image Cenerator Is a Willing Misinformation Superspreader Russia Resurrects its NATO-Ukraine False Narrative: NATO troops in coffins AI Chatbots Are Blocked by 67% of Top News Sites, Relying Instead on Low-Quality Sources NewsGuard relies on the data of its two datasets: Reliability Ratings (analyses of the reliability of all the news and information sources that account for 95% of online engagement in the countries it operates in, with 11,010 website ratings as of Dec. 2024), and Misinformation Fingerprints (a catalog of the top misinformation narratives spreading online, with 3,051 false narratives as of Dec. 2024).
QRE 29.1.2 Relevant Signatories will update their research in the Transparency Centre to allow for greater awareness and availability of their work.	All NewsGuard's yearly reports are available in the Transparency Centre. NewsGuard's public reports have been regularly shared on IDMO's portal.
QRE 29.1.3 Relevant Signatories will provide detailed information on methodology development to all stakeholders informed about research results. They will also regularly inform all members of the Task-force, including ERGA, EDMO and other Signatories about research activities they conduct, and, wherever possible, the related methodologies used. They will finally share, wherever possible, such research outcomes and related methodologies with the broader public.	NewsGuard's <u>white paper</u> , "Fighting Misinformation with Journalism, not Algorithms," which is published on our website, outlines independent research on the effect of using human-curated news reliability ratings to mitigate false news, some of which has been conducted by leading academic institutions and other top scholars using NewsGuard's Reliability Ratings dataset. In 2024, dozens researchers used NewsGuard's Reliability Ratings and/or NewsGuard's Misinformation Fingerprints as the basis for their research on misinformation and disinformation.
	NewsGuard is regularly in touch with ERGA and EDMO informing them of its works, making its data available when requested, and offering access to its datasets to monitor disinformation in Europe. NewsGuard's special reports and analyses are all available to the public on NewsGuard's website, including outcomes and methodologies.

VIII. Transparency Centre	
Commitment 34	

To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website. [change wording if adapted]	
Measure 34.1	Signatories establish and maintain the common Transparency Centre website, which will be operational and available to the public within 6 months from the signature of this Code.
Measure 34.2	Signatories provide appropriate funding, for setting up and operating the Transparency Centre website, including its maintenance, daily operation, management, and regular updating. Funding contribution should be commensurate with the nature of the Signatories' activity and shall be sufficient for the website's operations and maintenance and proportional to each Signatories' risk profile and economic capacity.
Measure 34.3	Relevant Signatories will contribute to the Transparency Centre's information to the extent that the Code is applicable to their services.
Measure 34.4	Signatories will agree on the functioning and financing of the Transparency Centre within theTask-force, to be recorded and reviewed within the Task-Force on an annual basis.
Measure 34.5	The Task-force will regularly discuss the Transparency Centre and assess whether adjustments or actions are necessary. Signatories commit to implement the actions and adjustments decided within the Task-force within a reasonable timeline.

VIII. Transparency Centre	
Commitment 35	
Signatories commit to ensure that the Transparency Centre contains all the relevant information related to the implementation of the Code's Commitments and Measures and that this information is presented in an easy-to-understand manner, per service, and is easily searchable. [change wording if adapted]	
Measure 35.3	Signatories ensure that the Transparency Centre contains a repository of their reports assessing the implementation of the Code's commitments.
Measure 35.6	The Transparency Centre will enable users to easily access and understand the Service Level Indicators and Qualitative Reporting Elements tied to each Commitment and Measure of the Code for each service, including Member State breakdowns, in a standardised and searchable way. The Transparency Centre should also enable users to easily access and understand Structural Indicators for each Signatory.

VIII. Transparency Centre
Commitment 36
Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner. [change wording if adapted]

Measure 36.2	Signatories will regularly update Service Level Indicators, reporting elements, and Structural Indicators, in parallel with the regular reporting foreseen by the monitoring framework. After the first reporting period, Relevant Signatories are encouraged to also update the Transparency Centre more regularly.
Measure 36.3	Signatories will update the Transparency Centre to reflect the latest decisions of the Permanent Task-force, regarding the Code and the monitoring framework.
QRE 36.1.1 (for the Commitments 34–36) With their initial implementation report, Signatories will outline the state of development of the Transparency Centre, its functionalities, the information it contains, and any other relevant information about its functioning or operations. This information can be drafted jointly by Signatories involved in operating or adding content to the Transparency Centre.	NewsGuard committed to setting up and maintaining a publicly available common Transparency Centre website. All relevant information related to the implementation of the Code's Commitments and Measures will be presented in an easy-to-understand and clear manner. That information will be regularly updated in a timely fashion.
QRE 36.1.2 (for the Commitments 34-36) Signatories will outline changes to the Transparency Centre's content, operations, or functioning in their reports over time. Such updates can be drafted jointly by Signatories involved in operating or adding content to the Transparency Center.	NewsGuard will be working with the other Signatories to outline any changes in the Transparency Centre's content, operations, or functioning in their reports over time.

	IX.	Permanent	Task-Force
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Commitment 37

Signatories commit to participate in the permanent Task-force. The Task-force includes the Signatories of the Code and representatives from EDMO and ERGA. It is chaired by the European Commission, and includes representatives of the European External Action Service (EEAS). The Task-force can also invite relevant experts as observers to support its work. Decisions of the Task-force are made by consensus. [change wording if adapted]

Measure 37.1	Signatories will participate in the Task-force and contribute to its work. Signatories, in particular smaller or emerging services will contribute to the work of the Task-force proportionate to their resources, size and risk profile. Smaller or emerging services can also agree to pool their resources together and represent each other in the Task-force. The Task-force will meet in plenary sessions as necessary and at least every 6 months, and, where relevant, in subgroups dedicated to specific issues or workstreams.
Measure 37.2	Signatories agree to work in the Task-force in particular – but not limited to – on the following tasks: - Establishing a risk assessment methodology and a rapid response system to be used in special situations like elections or crises. - Cooperate and coordinate their work in special situations like elections or crisis - Agree on the harmonised reporting templates for the implementation of the Code's Commitments and Measures, the refined methodology of the reporting, and the relevant data

	 disclosure for monitoring purposes. Review the quality and effectiveness of the harmonised reporting templates, as well as the formats and methods of data disclosure for monitoring purposes, throughout future monitoring cycles and adapt them, as needed. Contribute to the assessment of the quality and effectiveness of Service Level and Structural Indicators and the data points provided to measure these indicators, as well as their relevant adaptation. Refine, test and adjust Structural Indicators and design mechanisms to measure them at Member State level. Agree, publish and update a list of TTPs employed by malicious actors, and set down baseline elements, objectives and benchmarks for Measures to counter them, in line with the Chapter IV of this Code. Seek out and discuss research, expert input and up-to-date evidence relevant to the Code's commitments, such as, inter alia, emerging best practices in safe design, retroactive flagging, repository of fact-checks, provenance tools. Discuss and provide guidance on the adequate quantitative information to be provided by signatories to fulfill their reporting obligations regarding agreements with fact-checking organisations across different services. Regularly discuss whether the Code's Commitments and Measures need updating in view of technological, societal, market and legislative developments, as well as in view of accommodating new signatories and, where the Task-force agrees to be necessary, carry out such updates. Review the appropriateness and consistency of adapted Measures for smaller or emerging services.
Measure 37.3	 Promote the Code among relevant peers and integrate new Signatories to the Code. The Task-force will agree on and define its operating rules, including on the involvement of third-party experts, which will be laid down in a Vademecum drafted by the European Commission in collaboration with the Signatories and agreed on by consensus between the members of the Task-force.
Measure 37.4	Signatories agree to set up subgroups dedicated to the specific issues related to the implementation and revision of the Code with the participation of the relevant Signatories.
Measure 37.5	When needed, and in any event at least once per year the Task-force organises meetings with relevant stakeholder groups and experts to inform them about the operation of the Code and gather their views related to important developments in the field of Disinformation.
Measure 37.6	Signatories agree to notify the rest of the Task-force when a Commitment or Measure would benefit from changes over time as their practices and approaches evolve, in view of technological, societal, market, and legislative developments. Having discussed the changes required, the Relevant Signatories will update their subscription document accordingly and report on the changes in their next report.
QRE 37.6.1 Signatories will describe how they engage in the work of the Task-force in the reporting period, including the sub-groups they engaged with.	NewsGuard has been regularly participating in the meetings of the Code of Practice signatories, including the meeting about the conversion of the code into a Code of Conduct.

X. Monitoring of Code

Commitment 38

The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes to ensure the implementation of their commitments under the Code. [change wording if adapted]

Measure 38.1	
QRE 38.1.1 Relevant Signatories will outline the teams and	Members of NewsGuard's European team (including Roberta Schmid, Managing Editor and Vice-President Partnerships for
internal processes they have in place, per service, to comply	Germany and Austria, and Virginia Padovese and Chine Labbé, co-Managing Editors and Vice-Presidents for Partnerships for
with the Code in order to achieve full coverage across the	Europe,) are responsible for implementing and monitoring the company's commitments under the code in Germany, Austria,
Member States and the languages of the EU.	Italy, and France.

X. Monitoring of Code

Commitment 39

Signatories commit to provide to the European Commission, within 1 month after the end of the implementation period (6 months after this Code's signature) the baseline reports as set out in the Preamble. [change wording if adapted]

X. Monitoring of Code

Commitment 40

Signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code's Commitments and Measures by each Signatory, service and at Member State level. [change wording if adapted]

Measure 40.2	Other Signatories will report yearly on the implementation of the Commitments and Measures taken under the present Code, including on the relevant QREs and SLIs, at service and Member State level.
Measure 40.3	Signatories will regularly update the Transparency Centre with relevant QREs and SLIs, at least in line with their reporting period under this Code.
Measure 40.4	Signatories will develop, within the Task-force, harmonised reporting templates.
Measure 40.5	Signatories will regularly work to improve and optimise the monitoring and reporting framework of the Code, including the SLIs, within the Task-force, building in particular on feedback from the European Commission, ERGA and EDMO.

Measure 40.6	Signatories will cooperate with the European Commission, respond to its reasonable requests and provide the
	European Commission with reasonable information, data and further input necessary to assess the
	implementation of the Code, allowing for the Code's efficient and thorough monitoring, including at Member
	State Level.

X. Monitoring of Code

Commitment 41

Signatories commit to work within the Task-force towards developing Structural Indicators, and publish a first set of them within 9 months from the signature of this Code; and to publish an initial measurement alongside their first full report. To achieve this goal, Signatories commit to support their implementation, including the testing and adapting of the initial set of Structural Indicators agreed in this Code. This, in order to assess the effectiveness of the Code in reducing the spread of online disinformation for each of the relevant Signatories, and for the entire online ecosystem in the EU and at Member State level. Signatories will collaborate with relevant actors in that regard, including ERGA and EDMO. [change wording if adapted]

Measure 41.1	Within 1 month of signing the Code, Signatories will establish a Working Group to tackle this objective. This working group will be tasked with putting forward data points to be provided by Platform Signatories, and a methodology to measure Structural Indicators on the base of these data points, to be executed by non-Platform Signatories. Signatories will share data points appropriate to enable the measurement of metrics to be determined by the working group, such as prevalence or other contextualised metrics for sources and spread of online disinformation. Signatories will assess the work that will be necessary to deliver on the goals of this commitment, and discuss within the Task-force whether financial support is required.
Measure 41.2	The Working Group will report on its progress to the Task-force on a trimestral basis. It will consult with expert stakeholders including but not limited to EDMO, ERGA, and researchers to inform its work and outputs. 7 months after the signing of the Code, a conference will be convened with external stakeholders to present on progress thus far and seek feedback.
Measure 41.3	By 6 months after the signing of the Code, the Working Group will table with the Task-force a workable proposal for such Structural Indicators. By 9 months, relevant Signatories will provide to others within the Working Group the data points required to measure the Structural Indicators, and they will share publicly the aligned Structural Indicators. The Working Group will publish their measurements for the Structural Indicators in line with the first full report by the Signatories, as well as its full methodology, with the understanding that those may still require refinements over time. Signatories commit to keep updating the measurements, aligned with their reporting periods. Measurements will be published on the Transparency Centre in a way that allow to monitor them over time for the entire ecosystem and between different services.

X. Monitoring of Code

Commitment 42

Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. [change wording if adapted]

X. Monitoring of Code

Commitment 43

Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Taskforce. [change wording if adapted]

Reporting on the service's response during a period of crisis

Reporting on the service's response during a crisis	
Russia-Ukraine crisis	
immediately after Russia started platforms and websites, we hav Member States and playing up B	at time of reporting: In 2024 NewsGuard continued updating its "Russia-Ukraine Disinformation Tracking Center, launched in March 2022, d its full-scale invasion. Through our constant monitoring of Russian disinformation in Russian, English, French, Italian, and German across different re observed actors pushing false narratives about Ukraine, but also sowing division and nurturing anti-war and war fatigue sentiments across European fears and dissent. As of December 2024, NewsGuard's Russia-Ukraine Disinformation Tracking Center had identified 280 false narratives 645 websites around the world, including in Italy, France, Germany and Austria, versus 166 myths spread by 445 sites at the end of 2023.
Mitigations in place at time of re	eporting: N/A
information below provides a	ed to provide information relevant to their particular response to the threats and challenges they observed on their service(s). They ensure that the n accurate and complete report of their relevant actions. As operational responses to crisis/election situations can vary from service to service, an not be considered a priori a shortfall in the way a particular service has responded. Impact metrics are accurate to the best of signatories' abilities to measure them].
Scrutiny of Ads Placements	
Outline approaches pertinent to	this chapter, highlighting similarities/commonalities and differences with regular enforcement.
Specific Action applied (Measure 1.6)	Throughout the year, NewsGuard monitored and added to its database new detailed Reliability Ratings of websites spreading Russian Disinformation. NewsGuard also continued to update the "Russia–Ukraine Misinformation" metadata field accompanying its Reliability Ratings, to allow brands and advertisers using its BrandGuard services to easily identify these sites and make sure their ad money does not support the Kremlin disinformation machine. In doing so, NewsGuard continued using its transparent and apolitical evaluation process, whose methodology is detailed on its website, with all criteria clearly explained to publishers. NewsGuard also made sure that news publishers being flagged for spreading Russia–Ukraine disinformation were aware of it, and given a right to comment on issues flagged by NewsGuard. NewsGuard also continued offering these websites the possibility to publish a full response to their ratings.
	Indication of impact (at beginning of action: N/A
Empowering Users	

In 2024, NewsGuard continued to closely monitor sources of Russian disinformation within the continent, constantly adding new sources to its Tracking Center, and rating these sources according to its transparent rating system, so that users with access to its browser extension (a consumer product available to all for a monthly subscription fee) could make informed decision about which sources to trust, and which to be wary of, when reading the news online, and as the war became a protracted one. In a non-crisis situation, NewsGuard's main editorial promise is to rate all news and information sites that account for 95% of online engagement with news. However, for this specific line of work – just like we do for every crisis situation and did before for the COVID-19 pandemic –, NewsGuard's analysts went further, looking for any site spreading mis- and disinformation about the war in the languages we cover (English, French, Italian and German,) – even those responsible for very little online engagement – and making sure we rated them. We also made sure to track all sources that spread the myths we were uncovering, in order to cover more sources.		
Specific Action applied (Measures 17.2, 17.3, 22.4, and 22.5)	In 2024, NewsGuard's analysts participated in 15 media literacy seminars and awareness raising events in France, Italy, Bulgaria, and Greece, and an additional 41 speaking engagements in Italy, France, Belgium, Slovenia, Romania, Ireland, Portugal, Cyprus, Sweden. Most touched on all relevant crises, including the Russia-Ukraine war.	
	Throughout the year, NewsGuard's analysts fed its browser extension with transparent analyses of Russia-Ukraine misinformation sources. The analysts continued basing their ratings – as they always do – on NewsGuard's transparent, apolitical and independent process, applying equally our nine criteria to all sources.	
	Indication of impact (at beginning of action: N/A	
Empowering the Research Community		
Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.		
Specific Action applied (Measure 29.1)	In 2024, NewsGuard published four reports on the Russia–Ukraine crisis. The first one, published in March 2024, and titled "150 State–Sponsored Articles Blaming the West for the Moscow Terrorist Attack," documented how Russian, Chinese, and Iranian state media outlets all advanced false claims to blame the terror attack at Moscow's Crocus City Hall concert venue on their Western adversaries, even after the militant jihadist Islamic State (IS) claimed responsibility. In May 2024, a second report titled "The Fugitive Florida Deputy Sheriff Who Became A Kremlin Disinformation Impresario," profiled John Mark Dougan, a former Florida deputy sheriff who fled to Moscow after being investigated for computer hacking and extortion, and now manages networks of websites masquerading as local news sites and spreading pro-Russian propaganda. In June 2024, a report titled "Top 10 Cenerative AI Models Mimic Russian Disinformation Claims A Third of the Time, Citing Moscow–Created Fake Local News Sites as Authoritative Sources," tested the propensity of the top 10 AI chatbots to repeat known Russian disinformation narratives in the news. Finally, in July 2024, NewsGuard published a joint report with French AI start–up Bloom Social Analytics on the origins and dissemination pathways of the false narrative that dead NATO troops are being secretly repatriated from Ukraine. The reports detailed the research methodology, and were published on NewsGuard's website, where they still are available.	

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Reporting on the service's response during a crisis

2024 Paris Olympics

NewsGuard launched its 2024 Paris Olympics Misinformation Tracking Center on July 23, 2024, to address the barrage of false claims targeting the high-visibility, international sporting event. From fabricated media reports to content misrepresented as coming from brands or government agencies, false claims about the event focused on supposed terrorist threats and security risks, Paris' alleged lack of preparedness, and the presumed lack of popularity of the Games, seemingly aiming at undermining trust in the Games and the authorities organizing them, including the International Olympic Committee (IOC). In total, NewsGuard's team identified 36 misinformation narratives relating to the 2024 Paris Olympics in 17 languages: Arabic, Chinese, Dutch, English, French, German, Greek, Hungarian, Italian, Persian, Polish, Portuguese, Romanian, Russian, Slovenian, Spanish, and Turkish. The claims spread on social media as well as on 83 news and information websites. Confirming Russian influence operations targeting the Games, NewsGuard found that twenty-five of the 83 sites had a history of publishing false, pro-Russia propaganda and disinformation, including 11 sites that belong to the Pravda network, a group of anonymously-owned sites that republish content from pro-Kremlin sources and frequently advance false or egregiously misleading information.

Mitigations in place at time of reporting: N/A

Specific Action applied

(Measure 1.6)

[Note: Signatories are requested to provide information relevant to their particular response to the threats and challenges they observed on their service(s). They ensure that the information below provides an accurate and complete report of their relevant actions. As operational responses to crisis/election situations can vary from service to service, an absence of information should not be considered a priori a shortfall in the way a particular service has responded. Impact metrics are accurate to the best of signatories' abilities to measure them].

Scrutiny of Ads Placements

Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.

During several months before and after the 2024 Paris Olympics, NewsGuard monitored and added to its database new detailed Reliability Ratings of websites spreading misinformation about the Games. In doing so, NewsGuard continued using its transparent and apolitical evaluation process, whose methodology is detailed on its website, with all criteria clearly explained to publishers. NewsGuard also made sure that news publishers being flagged for spreading 2024 Paris Olympics Misinformation were aware of it, and given a right to comment on issues flagged by NewsGuard. NewsGuard also continued offering these websites the possibility to publish a full response to their ratings.

Indication of impact (at beginning of action: N/A

Empowering Users		
In July 2024, NewsGuard ramped up efforts to identify, rate, and monitor sources of 2024 Paris Olympics Misinformation in Europe, constantly adding new sources to its Tracking Center, and rating these sources according to its transparent rating system, so that users with access to its browser extension (a consumer product available to all for a monthly subscription fee) could make informed decision about which sources to trust, and which to be wary of when reading about the international competition. In December 2024, NewsGuard's global team of misinformation analysts had identified 36 myths spreading across social media, as well as 83 news and information websites.		
In a non-crisis situation, NewsGuard's main editorial promise is to rate all news and information sites that account for 95% of online engagement with news. However, for this specific line of work – just like we do for every crisis situation, and did before for the COVID-19 pandemic, and the Russia-Ukraine war, as described above –, NewsGuard's analysts went further, looking for any site spreading mis- and disinformation about the conflict in the languages we cover (English, French, Italian and German,) – even those responsible for very little online engagement – and making sure we rated them. We also made sure to track all sources that spread the myths we were uncovering, in order to cover more sources.		
Specific Action applied (Measures 17.2, 17.3, 22.4, and 22.5)	In 2024, NewsGuard's analysts participated in 15 media literacy seminars and awareness raising events in France, Italy, Bulgaria, and Greece, and an additional 41 speaking engagements in Italy, France, Belgium, Slovenia, Romania, Ireland, Portugal, Cyprus, Sweden. Most touched on all relevant crises, including the Paris Olympics.	
	As stated above, throughout the year, NewsGuard's analysts fed its browser extension with transparent analyses of Paris Olympics Misinformation sources. The analysts based their ratings - as they always do - on NewsGuard's transparent, apolitical and independent process, applying equally our nine criteria to all sources.	
	Indication of impact (at beginning of action: N/A	
Empowering the Research Community		
Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.		
Specific Action applied (Measure 29.1)	In 2024, NewsGuard sent regular briefings to its clients, including researchers, on the 2024 Paris Olympics, on top of its Tracking Center.	
	Indication of impact (at beginning of action: N/A	

Reporting on the service's response during a crisis

Rise of AI-generated content and Foreign Influence of Large-Language Models

In July 2024, NewsGuard launched its AI Misinformation Monitor, a monthly report that monitors the propensity for leading AI chatbots (such as ChatGPT and Gemini) to produce false information when prompted with untrue claims and false narratives, including State-sponsored narratives. Using a journalistic method grounded in rigorously verified data and human expertise, these monitors measure the trustworthiness of the AI industry in the domain of news. NewsGuard analysts identify vulnerabilities in AI systems that result in the spread of false information, allowing developers to strengthen their models and improve their safeguards.

Mitigations in place at time of reporting: N/A

[Note: Signatories are requested to provide information relevant to their particular response to the threats and challenges they observed on their service(s). They ensure that the information below provides an accurate and complete report of their relevant actions. As operational responses to crisis/election situations can vary from service to service, an absence of information should not be considered a priori a shortfall in the way a particular service has responded. Impact metrics are accurate to the best of signatories' abilities to measure them].

Empowering Users

Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.

Empowering the Research Community		
	Indication of impact (at beginning of action: N/A	
Specific Action applied (Measures 17.2, 17.3)	In 2024, NewsGuard's analysts participated in 15 media literacy seminars and awareness raising events in France, Italy, Bulgaria, and Greece, and an additional 41 speaking engagements in Italy, France, Belgium, Slovenia, Romania, Ireland, Portugal, Cyprus, Sweden. Most touched on all relevant crises, including the rise of AI-generated content, and how large-language models can be weaponized by malign actors into spreading state-sponsored propaganda and false narratives. For example, in April 2024, we delivered a keynote at AI Week in Italy, where we discussed the risks posed by generative AI to the information ecosystem and explored how journalism can play a crucial role in mitigating these risks.	

Specific Action applied (Measure 29.1)	In 2024, NewsGuard published seven Monthly AI Misinformation Monitors, including one (in October 2024) measuring the responses of the chatbots in French, on top of English.
	In its reports, NewsGuard described the research methodology of the analysis. All these reports were published on NewsGuard's website, where they still are available.
	Indication of impact (at beginning of action: N/A

Reporting on the service's response during an election

Reporting on the service's response during an election European Parliamentary Elections

NewsGuard launched its 2024 European Parliamentary Elections Misinformation Tracking Center on June 4, 2024, to track false claims targeting the event. NewsGuard's team identified false and misleading narratives targeting European Commission President Ursula von der Leyen; EU laws, regulations, and proposals; agriculture in the EU; and the EU voting procedures. The claims spread on social media as well as on misinformation and disinformation websites.

Mitigations in place – or planned – at time of reporting: N/A

Specific Action applied

(Measure 1.6)

[Note: Signatories are requested to provide information relevant to their particular response to the threats and challenges they observed on their service(s). They ensure that the information below provides an accurate and complete report of their relevant actions. As operational responses to crisis/election situations can vary from service to service, an absence of information should not be considered a priori a shortfall in the way a particular service has responded. Impact metrics are accurate to the best of signatories' abilities to measure them].

Scrutiny of Ads Placements

Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.

Since November of 2020, NewsGuard has implemented a specific "Election or Voting Misinformation" metadata field accompanying its Reliability Ratings, to allow brands and advertisers using its BrandGuard services to easily identify these sites and make sure their ad money does not support misinformation on electoral processes. Since then, our analysts have been tracking websites that repeatedly publish false or egregiously misleading claims about elections. These include sites that have published misinformation about the 2020 and 2024 U.S. presidential elections, the 2022 U.S. midterm elections, the 2017 and 2024 French presidential election, the September 2021 and 2025 federal elections in Germany, and the 2022 Italian national election, and the 2024 European Parliamentary Elections. In doing so, NewsGuard continued using its transparent and apolitical evaluation process, whose methodology is detailed on its website, with all criteria clearly explained to publishers. NewsGuard also made sure that news publishers being flagged for spreading Election Misinformation were aware of it and given a right to comment on issues flagged by NewsGuard. NewsGuard also continued offering these websites the possibility to publish a full response to their ratings.

Indication of impact (at beginning of action: N/A

Empowering Users

Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.

Specific Action applied (Measures 17.2, 17.3, 22.4, and 22.5)	In February 2024, NewsGuard launched a "2024 Elections Misinformation Tracking Center" to monitor the spread of misinformation related to several elections scheduled for 2024. NewsGuard launched its 2024 European Parliamentary Elections Misinformation Tracking Center on June 4, 2024, to detect new and emerging false claims, NewsGuard's team has been monitoring publishers that our analysts have determined have a history of repeatedly publishing false or egregiously misleading claims related to elections, including websites and social media accounts and video channels. In 2024, NewsGuard's analysts participated in 15 media literacy seminars and awareness raising events in France, Italy, Bulgaria, and Greece, and an additional 41 speaking engagements in Italy, France, Belgium, Slovenia, Romania, Ireland, Portugal, Cyprus, Sweden. Most touched on all relevant crises, including the European Parliamentary Elections, such as a panel discussion called "Information disorder in time of elections: insights from the 2024 European Elections" organized by the European Commission in Italy on June 26, 2024. Indication of impact (at beginning of action: expected impact) including relevant metrics when available		
	Empowering the Research Community		
Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.			
Specific Action applied (Measure 29.1)	In 2024, NewsGuard sent regular briefings to its clients, including researchers, on the 2024 European Parliamentary Elections, on top of its Tracking Center.		
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available		