Code of Conduct on Disinformation – Report of Newtral for the period January - December 2024

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Executive summary

Newtral is a media startup founded in January 2018. Our work is divided into three main business areas:

- Audiovisual production for television programs and streaming platforms. Our productions include *El Objetivo de Ana Pastor, Dónde Estabas Entonces,* and *Generación Top,* aired on laSexta; *Nevenka* for Netflix; *Sueño Real* for HBO; and *Los Borbones: una familia real* on Atresplayer.
- **Fact-checking and data verification.** On our website, you can find debunked hoaxes, fact-checks on political statements, as well as explainers, visualizations, and articles from our contributors.
- Innovation and research based on Artificial Intelligence protocols. We have made significant advancements in various AI-driven fact-checking solutions through automation on a *language-agnostic* platform powered by Artificial Intelligence and Machine Learning.

At Newtral, we are journalists, engineers, researchers, programmers, producers, directors, editors, graphic designers, and documentalists. As of September 1, 2024, we have 68 employees, 36 of whom are women, representing 60% of our management team.

Newtral's fact-checking team is formed by independent journalists who have no relationship with any political party, private interest, or advocacy organization. This team fact-checks the statements of politicians from different parties and public administrations daily as well as debunks viral misinformation. At the end of every piece we publish, we include a list of all sources we have used, including their links. We also invite readers to contact our team if they detect an error, have any comments about data related to our work, or have any doubts about anything whatsoever.

Newtral has partnerships with Meta and TikTok for debunking content proactively on those platforms. We also have a fact-checking service through WhatsApp, where anyone can ask us to verify any content they suspect is false. Besides journalists and fact-checkers, Newtral's team includes engineers and data scientists working on the automation of the fact-checking workflow. We have expertise in deep learning techniques and NLP data analysis. Additionally, we are members of both the EFCSN and the IFCN, reinforcing Newtral's commitment to upholding fact-checking standards, fostering transparency, and promoting the integrity of information.

Newtral's activities also cover other types of journalism and reporting, always highlighting the importance of data analysis and the interrelations between computer science and journalism.

As of 2019, Newtral also has an educational area under the name Newtral Educación, devoted to media literacy, data journalism, and promoting critical thinking in schools and universities.

Newtral joined the Code of Practice on Disinformation in 2022, reinforcing our commitment to transparency and the fight against misinformation. As part of this initiative, we actively participated in the transition of the Code into a Code of Conduct under the Digital Services Act (DSA), finalized in February 2025. This process marked a crucial step in strengthening the European Union's efforts to create a safer and more reliable information ecosystem.

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 17.1	
QRE 17.1.1 [insert wording if adapted]	At Newtral we have media literacy as one of our main objectives. In 2019 we launched Newtral Educación, a full division devoted to pursuing this goal. Through it, we participate in many activities with different types of civil society organizations, universities, and companies to generate a critical spirit and promote good practices in the field of verification.
SLI 17.1.1 - actions enforcing policies above [change wording if adapted]	In 2024, Newtral has reinforced its commitment to media literacy and the fight against disinformation by conducting training sessions tailored to diverse audiences, including schools, universities, associations, and companies. These initiatives have covered a wide range of topics, from fact-checking and misinformation detection to artificial intelligence and its impact on journalism and democracy. At the school level, Newtral has partnered with educational institutions to deliver workshops on podcast creation, responsible digital media use, and fact-checking techniques to help students identify and combat misinformation. In the university sphere, Newtral has collaborated with national and international institutions to promote critical thinking and enhance verification skills. Highlights include AI-driven fact-checking workshops in Spain and participation in summer courses at universities such as Carlos III of Madrid, Rey
	Juan Carlos, and Santiago de Compostela. Newtral has also delivered guest lectures on fact-checking at Duke University (United States) and the University of Glasgow (United Kingdom), strengthening its role as a global reference in the fight against disinformation. Beyond academia, Newtral has provided training sessions for associations, public institutions, and media professionals. Collaborations include a media literacy workshop for parents' associations in Aragón, participation in the Spanish Civil Guard's Intelligence and Security Summer Course in Logroño, and specialized training for journalists in Ghana and Ecuador. Additionally, Newtral has acted as a mentoring organization for the Fact-Checking Incubator, an initiative by the European fact-checking network (EFCSN) aimed at supporting emerging verification organizations.
	Furthermore, Newtral has expanded its outreach through educational initiatives such as the Verificatón , a fact-checking hackathon where university students apply real-time verification techniques during electoral debates. In 2024, four editions were held, focusing on elections in Galicia, Catalonia, the Basque Country,

ar	nd the United States, engaging 150 students from Spanish and American universities.
ro Ci	ewtral has also maintained its presence in major industry events, participating in over 30 seminars and bundtables organized by institutions like the Complutense University of Madrid, the Huesca Journalism ongress, and the Galician Academy of Public Security, addressing topics ranging from the ethical and echnological challenges of fact-checking to the impact of AI on journalism.
cc se th	inally, Newtral continues to innovate through projects such as FakesOver , an interactive educational game o-developed with FAD and Google to teach users how to detect and counteract misinformation, and a eries of TikTok video tutorials aimed at providing young audiences with practical verification tools. Through nese efforts, Newtral remains committed to promoting media literacy and equipping individuals with the skills eeded to navigate the digital information landscape responsibly.
l w	/e have also strengthened our commitment to media literacy through various projects, including:
	 DoCHECK!: Newtral is part of the Erasmus+ program DoCHECK!, co-funded by the European Commission, to promote media literacy and combat disinformation across Europe. The project aims to develop open educational resources for teachers and families. To achieve this goal, DoCHECK! brings together a consortium of six European partners, including Fundación Cibervoluntarios (Spain), the project coordinator; Epal Kaisarianis (Greece); the European School of Brussels II (Belgium); Centro Culturale Francesco Luigi Ferrari (Italy); WeSchool (Italy); and Newtral.
	 HYBRIDS: Newtral is also participating in the European innovation project HYBRIDS, which leverages hybrid intelligence to combat disinformation. Alongside 13 organizations from seven countries—including universities and research centers—this Horizon Europe-funded initiative combines engineering and linguistics to develop automated tools using natural language processing (NLP) and deep learning. The goal is to create advanced computational systems capable of identifying and mitigating disinformation.
	• Fact-Checking Incubator : With the support of Porticus, the EFCSN has launched a mentorship program for emerging fact-checking organizations. This initiative pairs 10 mentee organizations with experienced EFCSN-certified fact-checkers who act as mentors. The program includes seven training sessions designed to strengthen fact-checking capabilities, establish best practices, and guide mentees through the EFCSN certification process.
	• NERD : The NERD project focuses on developing an automated system to identify and monitor the monetization channels of disinformation. By analyzing websites that spread false information, NERD aims to create a comprehensive database to better understand how disinformation networks are funded and their potential impact on the European elections.
	• IBERIFIER+ : Newtral has joined the Iberian observatory IBERIFIER+ as a collaborating organization to support research and combat disinformation in Spain and Portugal. Linked to the European Digital Media Observatory (EDMO) and coordinated by the University of Navarra, IBERIFIER+ brings together universities, fact-checking organizations, and research institutions to develop joint solutions in the fight against disinformation.
The	hrough these initiatives, Newtral continues to expand its role in media literacy, fostering innovative trategies and collaborations to counter disinformation across Europe.

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	Newtral has designated two representatives to actively participate in both the Permanent Task Force and the Subgroups. Their role is to oversee and coordinate internal initiatives to ensure the effective implementation of our commitments under the Code of Conduct (formerly the Code of Practice). Beyond striving for full compliance, our goal is also to contribute our expertise, insights, and ideas to enrich the ongoing work and strengthen collective efforts in tackling disinformation.
QRE 38.1.1 [insert wording if adapted]	Newtral has allocated sufficient resources and has established appropriate internal processes to ensure the effective implementation of our commitments under the Code. We have formed a team of two people and instituted internal processes to achieve comprehensive coverage across all aspects of our commitment.

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]

This marks Newtral's third report submission under our commitment to the Code. Our previous reports were submitted in July 2023 and March 2024, ensuring continuous monitoring and accountability. With this new report, we cover all relevant activities and developments since our last submission, reaffirming our dedication to transparency and the fight against disinformation.

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 40.1	Newtral is delivering its third report.

Measure 40.2	Newtral is fully committed to cooperating with the European Commission, ensuring prompt responses to their requests for information and data. This cooperation is aimed at facilitating an efficient and thorough monitoring process for the implementation of the Code.
Measure 40.3	In the next six months, we will closely monitor the changes and obligations associated with the transition from the Code of Practice (CoP) to the Code of Conduct (CoC) under the Digital Services Act (DSA). Our focus will be on understanding the implications of this shift and ensuring that we remain aligned with new requirements, while also contributing our insights to enrich the ongoing work. This approach will help us stay responsive to any emerging developments and continue fulfilling our commitments.
Measure 40.4	In the next six months, our focus will be on actively tracking the changes and new obligations arising from the transition from the Code of Practice (CoP) to the Code of Conduct (CoC) within the framework of the Digital Services Act (DSA). This includes not only the ongoing reporting but also addressing any additional requirements or developments as they emerge, ensuring our full alignment with the evolving standards and contributing to the ongoing work.

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]

Newtral is committed to taking swift action during critical situations, such as elections or crises, in line with the rapid response system established by the Taskforce. In preparation for the 2024 European elections, we actively observed and analyzed disinformation narratives circulating in other countries during the 2019 elections to better anticipate similar challenges. Additionally, Newtral participated in the **Elections24Check** project, a collaboration with the European Fact-Checking Standards Network (EFCSN) and 40 organizations across Europe. Supported by Google, Elections24Check creates a repository of fact-checks, debunks, and reports on disinformation trends, enhancing cross-border collaboration and serving as a resource for European voters. This initiative aims to provide data-driven analysis and monitor disinformation related to the 2024 elections.

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Moreover, Newtral has contributed to **Climate Facts Europe**, an initiative focused on combating climate-related disinformation. The project has developed an open-access database for the European public to consult fact-checks related to climate disinformation. Additionally, it provides an alert system to notify fact-checking organizations and the European Climate Foundation about cross-border disinformation campaigns. In collaboration with EFCSN, we also contributed to the Terreno fértil para la desinformación narrative analysis with ScienceFeedback.

Finally, Newtral joined the Al@EUElections project, funded by Meta, to raise awareness about Al-generated and altered content ahead of the European elections. Alongside 30 other fact-checking organizations, Newtral translated and disseminated videos, infographics, and informational posts to increase awareness of the challenges posed by Al-generated content.

X. Monitoring of Code

Commitment 43

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Newtral is committed to generating reports and providing data in accordance with the harmonized reporting templates and refined methodology for reporting and data disclosure, collectively agreed upon within the Taskforce. As part of our proactive approach, we are actively preparing to enhance the maturity of this commitment in anticipation of the upcoming European elections. Additionally, Newtral is involved in **FactCRICIS**, a project launched in May 2024 and co-funded by the European Union. FactCRICIS aims to strengthen European fact-checking organizations' responses to crises, particularly related to climate change, by providing advanced tools, expert networks, and improved methodologies. This initiative further supports our readiness to address disinformation during crises, ensuring faster, more coordinated responses.

Reporting on the service's response during an election

Reporting on the service's response during an election

European Elections

Threats observed or anticipated at the time of reporting: In light of the upcoming European elections, it is imperative to address the proliferation of fake news campaigns fueled by misinformation, particularly among young individuals, regarding the functions and activities of the EU.

Mitigations in place – or planned - at the time of reporting: In anticipation of these challenges, Newtral has been actively monitoring potential disinformation and enhancing our coverage. We contributed to several initiatives like Elections24Check, a collaborative project with 40 fact-checking organizations, which aims to create a repository of verified information surrounding the European elections. We have also worked with Climate Facts Europe and Al@EUElections to counter misleading claims. Additionally, we have reinforced our coverage of parliamentary topics via ParlamentiaUE, ensuring more informed engagement on EU-related matters.

Through these efforts, including content on the disinformation narratives related to the election process, such as the piece we published alongside ScienceFeedback on June 3, 2024, addressing misinformation surrounding farmers' protests, we ensure swift responses to emerging disinformation. Our outreach specifically targets younger audiences through platforms they actively engage with, facilitating a clearer understanding of the EU's role.

[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

In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, we commit to continue and strengthen our efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups, specifically young people.

Specific Action applied (with reference to the Code's relevant Commitment and Measure)	We created two videos for our TikTok and Instagram accounts, along with six Instagram posts, to explain the impact of the EU on citizens and cover key aspects of the European elections.
	Together, these pieces have reached nearly 400,000 views and 14,000 likes, demonstrating strong engagement and interest in accessible, fact-based content about the electoral process.