

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

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Executive summary

Valid is a software company situated in Berlin, Germany. It builds solutions which make it possible to generate provenance indicators for (news) content. These provenance indicators enable users to check the source and authenticity of the news consumed across platforms. Moreover, the solutions allow consumers to verify whether content is synthetically generated or “real”. As a result, users have the chance to better distinguish between genuine content on the one hand and dis- and misinformation as well as spam on the other hand. Especially, Valid’s solutions are capable of countering the so-called Doppelgänger issue where bad actors including foreign operations pose as established news brands to spread disinformation.

Moreover, it has been established that the provenance indicators provided by Valid have a signalling function towards recommender systems of online platforms. In consequence, online platforms can utilise these signals to enhance their recommender systems especially in the context of AI SEO hacks and spam.

Valid provides an effective, scalable and transparent solution to make news content more findable and verifiable. This matches the desire of around half of the EU population who actively check whether the content that they encounter online is trustworthy in fear of consuming AI generated dis- and misinformation (see Unzicker, K., *Desinformation: Herausforderung für die Demokratier* (2023)). The solutions provided by Valid empower online users to take sovereign decisions in regard to the content they want to consume and is an adequate risk mitigation measure as foreseen by Article 35 of the Digital Services Act. This is particular the case as Valid helps to coherently disseminate news content as enshrined by Article 11 of the Charter of Fundamental Rights of the European Union.

Valid is an active member of the Taskforce of the Strengthened Code of Practice on Disinformation (2022). Valid became a Signatory of the Code in May 2023 is proud to have been part of establishing the subgroup ‘Generative AI’ and to work on this important matter with other stakeholders.

Valid engages in the fight on disinformation also by partaking in activities which supplement the work of the Taskforce. In this context, Valid has been conducting legal research on the DSA and the Code of Practice and shared this knowledge on numerous conferences and in journal articles (see Brorsen, H. and Falk, R., *Neue Compliance-Pflichten nach dem Digital Services Act*, *Zeitschrift für IT-Recht und Recht der Digitalisierung* (2024), p. 32). Moreover, Valid was part of the ISO international workshop agreement on designing so-called Unique Media Identifiers (IWA 2024:44) and is a member of the Coalition of Coalition for Content Provenance and Authenticity (C2PA).

Valid is proud to be supported by national and regional news organisations in Germany as well as by the German government.

V. Empowering Users

Commitment 20

Relevant Signatories commit to empower users with tools to assess the provenance and edit history or authenticity or accuracy of digital content.

Measure 20.1	
QRE 20.1.1	During the past year Valid has further developed its solution to that enables the attachment of provenance indicators to content and is now able to verify the authenticity and integrity of images.
Measure 20.2	
QRE 20.2.1	Valid has joined the Coalition for Content Provenance and Authenticity (C2PA).

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.

Measure 34.3	
Measure 34.5	

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.

Measure 35.3	
Measure 35.6	

VIII. Transparency Centre	
Commitment 36	
Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner.	
Measure 36.2	
Measure 36.3	
QRE 36.1.1 (for the Commitments 34-36)	-
QRE 36.1.2 (for the Commitments 34-36)	The administration of the Transparency Centre website has been transferred fully to the community of the Code's signatories, with VOST Europe taking the role of developer.
SLI 36.1.1 - (for Measures 34 and 36) meaningful quantitative information on the usage of the Transparency Centre, such as the average monthly visits of the webpage	The common Transparency Center has received around 20.255 in the reporting period. The average engagement time on the website is 4 minutes and 5 seconds and reports have been downloaded 5.626 times.
Data	

IX. Permanent Task-Force	
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.	
Measure 37.1	
Measure 37.2	
Measure 37.3	
Measure 37.4	
Measure 37.5	
Measure 37.6	
QRE 37.6.1	Valid joined the Taskforce in May 2023 and has been part of establishing the subgroup 'Generative AI' in late 2023. Here, Valid was part of organising a workshop on mitigation methods in the context of generative AI disinformation.

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.

Measure 38.1	
QRE 38.1.1	-

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.

Measure 40.2	
Measure 40.3	
Measure 40.4	
Measure 40.5	
Measure 40.6	

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.

Measure 41.1	
Measure 41.2	
Measure 41.3	

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.

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.