Code of Practice on Disinformation – Report of Microsoft for the period 1 July – 31 December 2024

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# **Executive Summary**

Microsoft welcomes the opportunity to file this fifth report on our compliance with the commitments of the strengthened 2022 EU Code of Practice on Disinformation, covering the second half of 2024. At Microsoft, we are committed to instilling trust and security across our products and services, and across the broader web. We recognise that information integrity is a key element in empowering users to access the information they need and freely express themselves. We also recognize that there is not a one size fits all approach to this work, and instead there needs to be a whole of society strategy that recognizes that not all services or platforms are the same and that there are a variety of efforts that can be effective in improving the information environment and empowering the public.

One opportunity is to continue employing AI as a resource in assisting and streamlining important work in detecting and assessing cyber enabled foreign influence operations. The harmful use of AI can also pose challenges in the information integrity space, including improved efficiency of deceptive and malicious images and videos, as malicious threat actors continue to build their capacity to create highly deceptive content efficiently. This requires continuous improvement and response to changing tactics. Microsoft's services are fully committed to utilising best in class tools and technology to help mitigate the risks of its services being misused.

Microsoft is taking a cross-product, whole-of-company approach to ensure the responsible implementation of Al. This starts with our Responsible Al Principles. Building on those principles in June of 2022, Microsoft released our Responsible Al Standard v.2 and Information Integrity Principles to help set baseline standards and guidance across product teams. Recognizing that there is an important role for government, academia and civil society to play in the responsible deployment of Al, we also created a roadmap for the governance of Al across the world as well as creating a vision for the responsible advancement of Al, both inside Microsoft and throughout the world, including specifically in Europe. For more information on Microsoft's commitment to Responsible Al and ongoing internal and external efforts, we encourage you to review our Responsible Al hub, which offers a range of information, tools, and resources related to the ethical and responsible use of Al technologies. It includes detailed information about Microsoft's internal Responsible Al processes and tools which can be used to responsibly develop and deploy Al products, including our first annual Responsible Al Transparency Report. In addition, Microsoft recently released a white paper focused on policy steps that can be taken to reduce the harms of abusive Al-generated content.

Serving as a leader in Al research, we are committed to proactively publicize our threat detection efforts for the benefit of the Al community, regulators, and broader society. As such, we have adopted six focus areas to combat the harmful use of deceptive Al:

- 1. A strong safety architecture
- 2. Durable media provenance and watermarking
- 3. Safeguarding our services from abusive content and conduct
- 4. Robust collaboration across industry and with governments and civil society
- 5. Modernized legislation to protect people from the abuse of technology
- 6. Public awareness and education

Additionally, we will continue to build upon these approaches to Responsible AI. For example, recognizing both the enormous potential for generative and other forms of AI to transform the world of work in positive ways and the potential risks AI presents in that context, LinkedIn published its framework of Responsible AI Principles, which is inspired by and aligned with Microsoft's Responsible AI Principles. LinkedIn provides more details on these principles in our response to Commitment 15.

Since our last report, Microsoft has continued to work with EU Member States and EU institutions to protect elections from cyber enabled influence operations by malicious threat actors. As part of that work, Microsoft and LinkedIn, along with 25 other companies, continued efforts to meet the commitments of the <u>Tech Accord to Combat Deceptive</u> <u>Use of AI in 2024 Elections (Tech Accord)</u>. We believe the success of the Tech Accord and our work together have contributed to the limited impact of deceptive AI-generated election content throughout the elections across the European Union in 2024.

Meeting the Tech Accord's commitments made it more difficult for malicious threat actors to use legitimate tools to create deceptive Al-generated election content, while simultaneously simplifying the process for users to identify authentic content. To meet its Tech Accord commitments, Microsoft moved forward with several important initiatives that are detailed further in this report. For example:

- Microsoft is harnessing the data science and technical capabilities of our AI for Good Lab and Microsoft Threat Analysis Center (MTAC) teams to better assess whether abusive content—including that created and disseminated by malicious threat actors—is synthetic or not. Microsoft AI for Good has been improving our detection model (image, video) to assess whether media was generated by AI. The model is trained on approximately 200,000 examples of AI and real content. AI for Good continues to invest in creating sample datasets representing the latest generative AI technology. When appropriate, the team calls on the expertise of Microsoft's Digital Crimes Unit to invest in and operationalize the early detection of AI-powered criminal activity and respond fittingly, through the filing of affirmative civil actions to disrupt and deter that activity and through threat intelligence programs and data sharing with customers and government.
- As part of our commitments related to public awareness and engagement, Microsoft ran a campaign titled <a href="Check. Recheck. Vote.">Check. Recheck. Vote.</a> containing a series of public messages and stood up an Al and Elections <a href="website">website</a> focused on engaging voters about the risks of deceptive Al and where to find authoritative election information. This campaign ran across the EU, UK, and the US in the lead up to major elections. Globally, the campaign reached hundreds of millions of people, with millions interacting with the content, connecting them with official election information.
- We developed a dedicated web portal Microsoft-2024 Elections political candidates and election authorities can report to us a concern about a deepfake of themselves or the election process that would violate our policy on deceptive Al-generated content.
- In advance of elections across the EU, we kicked off a global effort to engage campaigns and elections authorities to deepen understanding of the possible risks of deceptive AI in elections and empower those campaigns and election officials to speak directly to their voters about these steps they can take to build resilience and increase confidence in the election. In 2024, we delivered nearly 200 training sessions for political stakeholders in 25 countries, reaching over 4300 participants. This includes almost fifty separate training events with over 500 participants across EEA, including in France prior to the parliamentary elections.

Microsoft is committed to advancing information integrity and believes that including content credentials is an important driver for this. We were a founding member of the Coalition for Content Provenance and Authenticity (C2PA). To achieve transparency, support information integrity, and empower our users, we are leveraging C2PA's "content credentials" open standard across several products. For example, since 15 May 2024, content containing the "Content Integrity" technology has been automatically labelled on LinkedIn, with users beginning to see the "Cr" icon on images and videos that contain C2PA metadata.

During the reporting period, Microsoft continued piloting Content Integrity Tools, which allowed users to add content credentials to their own authentic content. Designed as a pilot program primarily to support the 2024 election cycle and gather feedback about Content Credentials-enabled tools, during the reporting period of this report, the tools were available to political campaigns in the EU, as well as to elections authorities and select news media organizations in the EU and globally. These tools included a partnership and collaboration with fellow Tech Accord signatory, TruePic. Announced in April 2024, this collaboration leveraged TruePic's mobile camera SDK enabling campaign, election, and media participants to capture authentic images, videos and audio directly from a vetted and secure device. Called the "Content Integrity Capture App" (an app that makes it easy to directly capture images with C2PA enabled signing) launched for both Android and Apple and can be used by participants in the Content Integrity Tools pilot program.

Beyond our commitment to combat deceptive use of Al during the electoral process, we implemented additional actions safeguarding candidates, election campaigns, election authorities, and voters:

- Microsoft's Campaign Success Team supported political parties and campaigns around the world to navigate the world of AI, combat the spread of cyber influence campaigns, and protect the authenticity of their own content and images.
- Microsoft's Election Communications Hub continued to support democratic governments around the world as they build secure and resilient election processes.
- Microsoft established a Virtual Situation Room, bringing together resources across the company to monitor, support, and protect elections in France and UK.
- Bing Search implemented a multifaceted approach to election integrity and integrated specialised answers and information panels for the elections across the European Union, with a link to official sources of information, which included voting information relevant to each EU Member State.

Microsoft continued its work with other trusted third-parties as part of a larger effort to empower Microsoft users to access the trusted information they are seeking. Microsoft also announced \$2M in societal resilience grants with OpenAl and several organizations benefited from the grants during this reporting period. Additionally, WITNESS, received a grant to improve journalists' ability to counter Al threats to elections. Training sessions were conducted ahead of the 2024 elections in Ghana, Georgia, and Venezuela, reaching 250 global participants. Microsoft's collaboration with WITNESS also includes co-leading the Deepfakes Rapid Response Force.

- Microsoft continues to provide pro-bono advertising space across Microsoft surfaces to disseminate media literacy campaigns, averaging 50 million impressions per
  month. Beginning in March 2024 and continuing through Fall 2024, Microsoft launched a new "Be Informed, Not Misled" campaign from the News Literacy Project.
  Microsoft also continues their partnership with the Trust Project, boosting their campaign to build audience literacy on evaluating the credibility of the content they
  encounter.
- In May 2024, Microsoft, in collaboration with OpenAI, launched the Societal Resilience Grants to support various organizations in promoting AI literacy, ethical AI use, and societal resilience against AI-related challenges. The grants were awarded to the Older Adults Technology Services from AARP, International IDEA, Partnership on AI, Coalition for Content Provenance and Authenticity (C2PA), and WITNESS. These initiatives have reached national election bodies in 26 countries, 500,000 older adults, and 250 global journalists, demonstrating a comprehensive approach to addressing AI threats and fostering responsible AI practices.

These initiatives underscore Microsoft's commitment to fostering a resilient and informed society in the age of Al. These grants build on an existing effort by Microsoft to support media, Al, and information literacy globally. We have continued our work with leading news and media literacy nonprofits, including the News Literacy Project (NLP), a collaboration led by The Trust Project on the Trust Indicators, and Verified, to develop campaigns built on industry research and best practices. Microsoft provided funding for the research and development of public awareness and education campaigns and supported partners with threat intelligence insights, technical expertise, and increased visibility

through in-kind ad space on Microsoft platforms. Microsoft also worked to reach young learners with dynamic and entertaining content that builds knowledge and skills. For instance,

Microsoft has subscribed to the Code of Practice with the following services:

- <u>Bing Search</u> is an online search engine with the primary objective of connecting users to the most relevant search results from the web. Users come to Bing with a specific research topic in mind and expect Bing to provide links to the most relevant and authoritative third-party websites on the Internet that are responsive to their search terms. Therefore, addressing misinformation or disinformation in organic search results often requires a different approach than may be appropriate for other types of online services, as over-moderation of content in search could have a significant negative impact on the right to access information, freedom of expression, and media plurality. Therefore, Bing must carefully balance these fundamental rights and interests as it works to ensure that its algorithms return the most high-quality content available that is relevant to the user's queries, working to avoid causing harm to users without unduly limiting their ability to access answers to the questions they seek. In some cases, different features may require different interventions based on functionality and user expectations. While Bing's remediation efforts may on occasion involve removal of content from search results (where legal or policy considerations warrant removal), in many cases, Bing has found that actions such as targeted ranking interventions, or additional digital literacy features such as Answers pointing to high authority sources and content provenance indicators, are more effective. Bing regularly reviews the efficacy of its measures to identify additional areas for improvement and works with internal and external subject matter experts in key policy areas to identify new threat vectors or improved mechanisms to help prevent users from being unexpectedly exposed to harmful content in search results that they did not expressly seek to find. During the Reporting Period, the nature of Bing generative AI experiences evolved. In October 2024, Microsoft launched a separate, standalone consumer service known as Microsoft Copilot at copilot.microsoft.com, which offers conversational experiences powered by generative AI, and the Copilot in Bing (formerly known as Bing Chat) generative AI experience was phased out. Bing continues to offer generative AI experiences, such as Bing Image Creator and Bing Generative Search, which was launched this Reporting Period. Bing Generative Search utilizes AI to deliver a unique experience by not only optimizing search results but presenting information in a user-friendly, cohesive layout. Results also include citations and links that enable users to explore further and evaluate websites for themselves. For both of these Al-powered experiences, Bing has partnered closely with Microsoft's Responsible AI team to proactively address AI-related risks and continues to evolve these features based on user and external stakeholder feedback.
- <u>LinkedIn</u> is a real identity online social networking service for professionals to connect and interact with other professionals, grow their professional network and brand, and seek career development opportunities. LinkedIn is part of its members' professional identity and has a specific purpose. Activity on the platform and content members share can be seen by current and future employers, colleagues, potential business partners and recruitment firms, among others. Given this audience, members by and large tend to limit their activity to professional areas of interest and expect the content they see to be professional in nature. LinkedIn is committed to keeping its platform safe, trusted, and professional and respects the laws that apply to its services. On joining LinkedIn, members agree to abide by LinkedIn's <u>User Agreement</u> and its <u>Professional Community Policies</u>, which expressly forbid members from posting information that is false or misleading.
- <u>Microsoft Advertising</u> is our proprietary advertising platform, which serves the vast majority of ads displayed on Bing Search and provides advertising to most other Microsoft services that display ads, as well as many third-party services. Microsoft Advertising works both with advertisers, who provide it with advertising content, and publishers, such as Bing Search, who display these advertisements on their services. Microsoft Advertising employs a distinct set of policies and enforcement measures

with respect to each of these two categories of business partners to prevent the spread of disinformation, including through discouraging and reducing the dissemination and monetization of disinformation through advertising.

As a company, we continued our efforts during the reporting period to empower users to better understand the information they consume across our platforms and products. For example, Bing compiled a specialized dataset of European Parliament election related queries in different EU languages for use by the research community and to support transparency; researchers can apply using the form found <a href="here">here</a>. Over the course of the next reporting period, we will continue to make this information transparent and public. Specifically, we will continue to focus on the following areas:

- Further de-funding the mechanisms malicious threat actors are using to push their narratives and propaganda and regularly evaluating and improving user and advertiser policies as needed.
- Ensuring Microsoft and LinkedIn AI products are developed consistent with Microsoft's Responsible AI Standards and LinkedIn's Responsible AI Principles, as relevant, and that risks associated with AI systems are mitigated to provide safe, trustworthy, and ethical experiences for users and, further, ensuring that our information integrity principles are integrated into AI systems included in Microsoft products.
- Continuing to monitor foreign information influence operations and actioning such intelligence appropriately through defensive search and other techniques. This includes working with trusted third parties Microsoft uses to inform its work detecting and disrupting these influence operations. This also includes adding trusted third parties in additional languages, ensuring global coverage for our information integrity work.
- Strengthening our efforts and expanding our funding in the areas of media literacy and critical thinking, aiming to include vulnerable groups and having greater language access. As part of our focus areas and commitments under the Tech Accord we will increase our partnerships to increase Al literacy efforts and build greater understanding of provenance and other trustworthiness indicators.
- Supporting good faith research into disinformation and broader disinformation trends and tactics.
- Continue to share learnings pertaining to generative Al and Responsible Al practices as products and services evolve and new threats emerge. In addition, Microsoft will continue to regularly evaluate, implement, and share best practices for addressing disinformation trends as we navigate the technological changes posed by the malicious use of Al.
- Develop new partnerships to support EU-specific risks and continue to explore further ways to help users evaluate content on our services.
- Enhance existing research tooling to provide enhanced data reporting and continue to deliver relevant data and research to support research into the spread of disinformation.
- Educating users on generative AI features, including their risks and limitations, and providing the broader public and research community with information on our approach to Responsible AI
- Implementing and regularly evaluating measures to support safe and democratic elections in the EU and to direct users to high authority sources of information about elections.

Unless stated otherwise, data provided under this report covers a reporting period of 1 July 2024 to 31 December 2024 ("Reporting Period").

# Subscription per Service overview during the Reporting Period

Commitments	Measures	LinkedIn  Microsoft  Advertising		Bing Search	Microsoft Corporation					
	II. Scrutiny of Ad Placements									
	Measure 1.1									
	Measure 1.2		$\boxtimes$							
1	Measure 1.3	$\boxtimes$	$\boxtimes$							
ľ	Measure 1.4	$\boxtimes$								
	Measure 1.5	$\boxtimes$	$\boxtimes$							
	Measure 1.6	$\boxtimes$	$\boxtimes$							
	Measure 2.1	$\boxtimes$	$\boxtimes$							
2	Measure 2.2									
2	Measure 2.3									
	Measure 2.4	$\boxtimes$	$\boxtimes$							
	Measure 3.1	$\boxtimes$	$\boxtimes$							
3	Measure 3.2	$\boxtimes$	$\boxtimes$							
	Measure 3.3									
		III. Political	Advertising							
4	Measure 4.1									
4	Measure 4.2		$\boxtimes$							
5	Measure 5.1	$\boxtimes$	$\boxtimes$							
	Measure 6.1									
	Measure 6.2									
6	Measure 6.3									
	Measure 6.4									
	Measure 6.5									
7	Measure 7.1									
/	Measure 7.2									

	Measure 7.3	$\boxtimes$	$\boxtimes$			
	Measure 7.4					
8	Measure 8.1					
0	Measure 8.2					
9	Measure 9.1					
9	Measure 9.2					
10	Measure 10.1					
10	Measure 10.2					
	Measure 11.1					
11	Measure 11.2					
11	Measure 11.3					
	Measure 11.4					
	Measure 12.1					
12	Measure 12.2					
	Measure 12.3					
	Measure 13.1					
13	Measure 13.2					
	Measure 13.3					
		IV. Integrity	of Services			
	Measure 14.1			$\boxtimes$		
14	Measure 14.2	$\boxtimes$		$\boxtimes$		
	Measure 14.3	$\boxtimes$		$\boxtimes$		
15	Measure 15.1	$\boxtimes$		$\boxtimes$		
15	Measure 15.2	$\boxtimes$		$\boxtimes$		
16	Measure 16.1	$\boxtimes$		$\boxtimes$		
10	Measure 16.2	$\boxtimes$				
V. Empowering Users						
	Measure 17.1			$\boxtimes$		
17	Measure 17.2			$\boxtimes$		
	Measure 17.3			$\boxtimes$		

	Measure 18.1	$\boxtimes$			
18	Measure 18.2	$\boxtimes$		$\boxtimes$	
	Measure 18.3	$\boxtimes$		$\boxtimes$	
19	Measure 19.1	$\boxtimes$		$\boxtimes$	
19	Measure 19.2	$\boxtimes$		$\boxtimes$	
20	Measure 20.1	$\boxtimes$		$\boxtimes$	
20	Measure 20.2	$\boxtimes$		$\boxtimes$	
	Measure 21.1	$\boxtimes$		$\boxtimes$	
21	Measure 21.2	$\boxtimes$			
	Measure 21.3	$\boxtimes$		$\boxtimes$	
	Measure 22.1	$\boxtimes$			
	Measure 22.2	$\boxtimes$		$\boxtimes$	
	Measure 22.3	$\boxtimes$		$\boxtimes$	
22	Measure 22.4				
	Measure 22.5				
	Measure 22.6				
	Measure 22.7	$\boxtimes$		$\boxtimes$	
23	Measure 23.1	$\boxtimes$		$\boxtimes$	
23	Measure 23.2	$\boxtimes$		$\boxtimes$	
24	Measure 24.1	$\boxtimes$			
25	Measure 25.1				
23	Measure 25.2				
	VI. E	impowering the I	Research Commu	nity	
	Measure 26.1	$\boxtimes$		$\boxtimes$	
26	Measure 26.2	$\boxtimes$		$\boxtimes$	
	Measure 26.3	$\boxtimes$		$\boxtimes$	
	Measure 27.1	$\boxtimes$		$\boxtimes$	
27	Measure 27.2	$\boxtimes$		$\boxtimes$	
21	Measure 27.3	$\boxtimes$		$\boxtimes$	
	Measure 27.4	$\boxtimes$		$\boxtimes$	

	Measure 28.1	$\boxtimes$		$\boxtimes$	
28	Measure 28.2	$\boxtimes$		$\boxtimes$	
20	Measure 28.3	$\boxtimes$		$\boxtimes$	
	Measure 28.4	$\boxtimes$		$\boxtimes$	
	Measure 29.1				
29	Measure 29.2				
	Measure 29.3				
	VII. Em	powering the Fa	ct-checking Com	nunity	
	Measure 30.1	$\boxtimes$		$\boxtimes$	
30	Measure 30.2	$\boxtimes$		$\boxtimes$	
30	Measure 30.3	$\boxtimes$		$\boxtimes$	
	Measure 30.4	$\boxtimes$		$\boxtimes$	
	Measure 31.1	$\boxtimes$			
31	Measure 31.2	$\boxtimes$		$\boxtimes$	
31	Measure 31.3	$\boxtimes$		$\boxtimes$	
	Measure 31.4	$\boxtimes$		$\boxtimes$	
	Measure 32.1	$\boxtimes$		$\boxtimes$	
32	Measure 32.2	$\boxtimes$			
	Measure 32.3	$\boxtimes$		$\boxtimes$	
33	Measure 33.1				
		VIII. Transpa	rency Centre		
	Measure 34.1				$\boxtimes$
	Measure 34.2				$\boxtimes$
34	Measure 34.3				$\boxtimes$
	Measure 34.4				$\boxtimes$
	Measure 34.5				$\boxtimes$
	Measure 35.1				$\boxtimes$
35	Measure 35.2				$\boxtimes$
55	Measure 35.3				$\boxtimes$
	Measure 35.4				$\boxtimes$

	Measure 35.5				
	Measure 35.6				
		_		_	
	Measure 36.1				
36	Measure 36.2				
	Measure 36.3				
		IX. Permaner	nt Task-Force		
	Measure 37.1				$\boxtimes$
	Measure 37.2				$\boxtimes$
37	Measure 37.3				
31	Measure 37.4				$\boxtimes$
	Measure 37.5				$\boxtimes$
	Measure 37.6				$\boxtimes$
		X. Monitoring	g of the Code		
38	-				$\boxtimes$
39	-				$\boxtimes$
	Measure 40.1				$\boxtimes$
	Measure 40.2				$\boxtimes$
40	Measure 40.3				$\boxtimes$
40	Measure 40.4				$\boxtimes$
	Measure 40.5				
	Measure 40.6				$\boxtimes$
	Measure 41.1		$\boxtimes$		$\boxtimes$
41	Measure 41.2				$\boxtimes$
	Measure 41.3				
42	-				
43	-				
44	-				$\boxtimes$

# II. Scrutiny of Ad Placements

Commitments 1 - 3

# **II. Scrutiny of Ad Placements**

## 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

	C.1	M 1.1	M 1.2	M 1.3	M 1.4	M 1.5	M 1.6
We signed up to the following	LinkedIn	LinkedIn	LinkedIn	LinkedIn	LinkedIn	LinkedIn	LinkedIn
measures of this commitment:	Microsoft	Microsoft	Microsoft	Microsoft		Microsoft	Microsoft
	Advertising	Advertising	Advertising	Advertising		Advertising	Advertising

	LinkedIn	Microsoft Advertising
In line with this commitment, did you deploy new implementation measures (e.g. changes to	No	No
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable.	Not applicable.
Do you plan to put further implementation measures in place in the next 6 months to	Yes	Yes
substantially improve the maturity of the implementation of this commitment? [Yes/No]		
If yes, which further implementation measures do you plan to put in place in the next 6	Planned Implementation Measures	Planned Implementation Measures
months?		
	LinkedIn plans to continue to assess	Microsoft Advertising plans to
	its policies and services and to	continue to assess its policies,
	update them as warranted.	services and accreditations to
		update them as warranted.

Measure 1.1	LinkedIn	Microsoft Advertising
Measure 1.1 <b>QRE 1.1.1</b>	LinkedIn prohibits misinformation and disinformation on its platform, whether in the form of organic content or in the form of advertising content. LinkedIn's Professional Community Policies, which apply to all content on LinkedIn's platform, expressly prohibit false and misleading content, including misinformation and disinformation:  • Do not share false or misleading content. Do not share content that is false, misleading, or intended to deceive. Do not share content to interfere with or improperly influence an election or civic process. Do not share content that directly contradicts guidance from leading global health organisations and public health authorities; including false information about the safety or efficacy of vaccines or	Microsoft Advertising prohibits misinformation and disinformation on its network.  As reported in QRE 1.2.1, Microsoft Advertising works with selected, trustworthy publishing partners and requires these partners to abide by strict brand safety-oriented policies to avoid providing revenue streams to websites engaging in misleading, deceptive, harmful, or insensitive behaviours.  Additionally, Microsoft Advertising has network-wide policies to avoid the publishing and carriage of harmful Disinformation and the placement of advertising next to Disinformation content. Such policies prohibit ads or sites that contain or lead to Disinformation. To enforce this policy, "We may use a combination of internal signals and trusted third-party data or information
	medical treatments. Do not share content or endorse someone or something in exchange for personal benefit (including personal or family relationships, monetary payment, free products or services, or other value), unless you have included a clear and conspicuous notice of the personal benefit you receive and have otherwise complied with our Advertising Policies.	sources to reject, block, or take down ads or sites that contain disinformation or send traffic to pages containing disinformation. We may block at the domain level landing pages or sites that violate this policy." Please see <a href="here">here</a> for our main policy page.
	LinkedIn provides specific examples of false and misleading content that violates its policy via a Help Center article on <a href="False or Misleading Content">False or Misleading Content</a> .	
	LinkedIn's <u>Advertising Policies</u> incorporate the Professional Community Policies provision, and similarly prohibit misinformation and disinformation. In addition, LinkedIn's Advertising Policies also prohibit fraudulent and deceptive ads, and require that claims in an ad have factual support:	

Fraud and Deception: Ads must not be fraudulent or deceptive. Your product or service must accurately match the content of your ad. Any claims in your ad must have factual support. Do not make deceptive or inaccurate claims about competitive products or services. Do not imply you or your product are affiliated with or endorsed by others without their permission. Additionally, make sure to disclose any pertinent partnerships when sharing advertising content on LinkedIn. Do not advertise prices or offers that are inaccurate - any advertised discount, offer or price must be easily discoverable from the link in your ad. Of note, unlike some other platforms, LinkedIn does not allow members to monetise or run ads against their content, nor does it offer a member ad revenue share program. Thus, members publishing disinformation on LinkedIn are not able to monetise that disinformation or collect advertising revenue via LinkedIn. LinkedIn has instead reported the number of ads it restricted on its platform during the period. SLI 1.1.1 -Methodology of data measurement: Methodology of data measurement: **Numbers by** actions The table below reports metrics concerning ads LinkedIn restricted Microsoft Advertising assesses the impact of its actions by reporting on the under the misinformation policies in QRE 1.1.1. individual ads that we prevented from monetizing on web properties enforcing policies above participating in the Microsoft Advertising network (i.e., "publisher sites" that use the Microsoft Advertising services to display ads on their properties), and the (specify if at The metrics include: 1. the number of ads LinkedIn restricted under the number web domains that we blocked from participating in our ad network. We page and/or domain level) misinformation policies in QRE 1.1.1 between 1 July - 31 focus our reporting on the number of instances where ads would have been December 2024, broken out by EEA Member State; served but have been restricted from serving, thus eliminating an "impression". 2. the number of impressions those ads received before they Below we define this methodology as a count of Page Views. were restricted. The metrics are assigned to EEA Member "Page Views" represents the number of pages viewed in which we prevented State based on the primary country targeting of the ad. an ad from being served. This means that we proactively blocked ads before No ads were restricted under the misinformation policies in QRE 1.1.1 between 1 July - 31 December 2024.

The following factors may contribute to the number of ads reported by LinkedIn being lower than other platforms:

- LinkedIn is primarily a business-to-business advertising platform
   that is, businesses marketing their products and services to other businesses and members in a professional capacity.
- Related, because of the business-to-business nature of LinkedIn's advertising platform, ads on LinkedIn may cost more than ads in other settings, impacting the ads run on LinkedIn.

they may be shown to a consumer. Please see SLI 1.1.2 for the Euro value of ads demonetized associated with this Page Views data.

"Domain" represents the number of web domains which received at least one page view in a Member State. Since Microsoft Advertising blocks domains across all regions (meaning, we don't break down the blocks at the individual country level because we apply the same globally), we are reporting on the overall number across all Member States for the current reporting period.

	The number of ads LinkedIn	The number of impressions	Page Views	Domain
	restricted under its misinformation	the ads received before they		
	policies in QRE 2.1.1 between 1 July	were restricted.		
	– 31 December 2024			
Level	Ads	Impressions	Page Views	Domain
Member States				
Austria	0	0	460,850	
Belgium	0	0	0	
Bulgaria	0	0	3,504	
Croatia	0	0	5,079	
Cyprus	0	0	3,950	
Czech Republic	0	0	75,076	
Denmark	0	0	95,138	
Estonia	0	0	1,438	
Finland	0	0	0	
France	0	0	1,784,624	
Germany	0	0	4,418,339	
Greece	0	0	0	
Hungary	0	0	11,815	
Ireland	0	0	326,844	
Italy	0	0	8,256,291	

Total EEA	0	0	15,589,004	158
Total EU	0	0	15,492,563	158
Norway	0	0	96,441	
Liechtenstein	0	0	0	
Iceland	0	0	0	
Sweden	0	0	0	
Spain	1	0	0	
Slovenia	0	0	0	
Slovakia	0	0	0	
Romania	0	0	20,952	
Portugal	0	0	0	
Poland	0	0	23,777	
Netherlands	0	0	0	
Malta	0	0	3,032	
Luxembourg	0	0	0	
Lithuania	0	0	1,386	
Latvia	0	0	468	

This additional Service Level Indicator provides an estimated financial value of the actions taken by Signatories to demonetise disinformation sources (under SLI 1.1.1). It is based on media metrics available to Signatories (query/bid1 or impression2) and applying an agreed-upon conversion factor provided by a third party designated by the Task-force of the Code (Ebiquity Plc.).

SLI 1.1.2 - Preventing the	Methodology of data measurement:	Methodology of data measurement:
flow of legitimate		
advertising investment to	Following the methodology developed by the Task-force	Following the methodology developed by the Task-force Subgroup on Ad
sites or content that are	Subgroup on Ad Scrutiny, this SLI considers the impressions	Scrutiny, this SLI considers Page Views and applies an agreed-upon conversion
designated as	to ads or sources that were blocked and applies an agreed-	factor to those impressions.
disinformation	upon conversion factor to those impressions.	

<sup>&</sup>lt;sup>1</sup> Request placed between a seller and buyer of advertising that can detail amongst other things website, specific content, targeting data inclusive of audience or content.

<sup>&</sup>lt;sup>2</sup> Comprehensive calculation of the number of people who have been reached by a piece of media content by passive exposure (viewing a piece of content) or active engagement (visiting a destination).

		It should be noted, however, that Microsoft Advertising is a "pay per click" (PPC)
	As reported above, LinkedIn restricted 0 ads between 1 July	ad network. This means that advertisers are charged following a click on the ad,
	- 31 December 2024 under its misinformation policies in	and not based on the number of impressions served. We therefore calculated
	QRE 1.1.1.	the approximate financial value in the table by using the "blended CPM" value
		provided by Ebiquity Plc. and the following equation:
	We calculated the approximate financial value in the table	
	by using a "blended CPM" value and the following equation:	(Page Views/1000) x Blended CPM; where CPM means "Cost Per Mille."
	(Impressions/1000) x Blended CPM; where CPM means "Cost Per Mille."	As described above, Microsoft Advertising prevents serving any ads on web domains that spread disinformation. Such proactive measures block all ad traffic upfront (i.e., we act at the earliest point of identification, which could mean prior to an impression being served), which brings the monetization on those web properties down to zero. Please see SLI 1.1.1 for the associated number of advertisements that we proactively prevented from showing to a consumer.
	Euro value of ads demonetised	Euro value of ads demonetised
Member States		
Austria	0	€ 1,843.40
Belgium	0	€ 0.00
Bulgaria	0	€ 5.26
Croatia	0	€ 17.78
Cyprus	0	€ 9.88
Czech Republic	0	€ 300.30
Denmark	0	€ 428.12
Estonia	0	€ 3.60
Finland	0	€ 0.00
France	0	€ 7,138.50
Germany	0	€ 19,882.53
Greece	0	€ 0.00
Hungary	0	€ 23.63

Ireland	0	€ 980.53
Italy	0	€ 28,897.02
Latvia	0	€ 1.40
Lithuania	0	€ 3.47
Luxembourg	0	€ 0.00
Malta	0	€ 9.10
Netherlands	0	€ 0.00
Poland	0	€ 35.67
Portugal	0	€ 0.00
Romania	0	€ 31.43
Slovakia	0	€ 0.00
Slovenia	0	€ 0.00
Spain	0	€ 0.00
Sweden	0	€ 0.00
Iceland	0	€ 0.00
Liechtenstein	0	-
Norway	0	€ 530.43
Total EU	0	€ 59,612
Total EEA	0	€ 60,142

Measure 1.2	LinkedIn	Microsoft Advertising
	LinkedIn does not offer a member ad revenue share program and does not	Microsoft Advertising works with selected, trustworthy publishing
	allow members to monetise content they post to LinkedIn by running ads	partners and requires these partners to abide by strict brand safety-
	against it.	oriented policies to avoid providing revenue streams to websites
QRE 1.2.1		engaging in misleading, deceptive, harmful, or insensitive behaviors.
QRE 1.2.1	LinkedIn displays ads in two environments: (1) on the LinkedIn platform, which	These publishers also benefit from the set of measures identified
	accounts for the vast majority of ads; and (2) on the LinkedIn Audience Network,	above that Microsoft Advertising takes with regard to advertisers,
	which allows LinkedIn advertisers to extend their reach to professionals on a	which ensures that these partners receive high-integrity, non-
	curated network of approximately twenty-five thousand third-party publishers	deceptive ads from the Microsoft Advertising platform.

selected by LinkedIn (for example, Nasdaq.com, CNN.com, Vogue.com, Realtor.com).

With respect to the first category – ads displayed on the LinkedIn platform – as noted in response to QRE 1.1.1, unlike other platforms, LinkedIn does not offer a content monetisation or an ad revenue share program to members. Thus, no member content is monetised or demonetised, and there is no ability for a member publishing disinformation to collect any advertising revenue share from LinkedIn.

With respect to the second category – ads displayed on the LinkedIn Audience Network – LinkedIn takes a number of steps to help ensure LinkedIn advertisers' ads appear in a trusted environment and that publishers that systematically provide harmful disinformation are not included in the LinkedIn Audience Network.

- First, the LinkedIn Audience Network is a curated network of third-party sites and apps selected by LinkedIn. LinkedIn does not allow any blog, application, or website to join the LinkedIn Audience Network and display ads; rather, LinkedIn selects the publishers that are included in the network.
- Second, LinkedIn has integrated with partners, such as Integral Ad Science and DoubleVerify, to help monitor the quality and brand safety of the publishers in the LinkedIn Audience Network and filter out publisher inventory that falls short of standards, such as brand safety floors.
- Third, LinkedIn regularly reviews the publishers included in the LinkedIn Audience Network to ensure they meet LinkedIn standards and are serving LinkedIn advertisers.

To date, LinkedIn has periodically removed publishers from the LinkedIn Audience Network, but has not had to remove any publisher as a result of publishing disinformation.

Microsoft Advertising's policies with respect to these publishers include a comprehensive list of prohibited content that ads cannot serve against. Prohibited content includes, but is not limited to, Disinformation, sensitive political content (e.g., extreme, aggressive, or misleading interpretations of news, events, or individuals), unmoderated user-generated content, and unsavory content (such as content disparaging individuals or organizations). Publishers are required to maintain a list of prohibited terms and provide us with information on their content management practices where applicable. In addition to content requirements, publishers are required to abide by restrictions against engaging in business practices that are harmful to users (e.g., distributing malware).

Microsoft Advertising reviews publisher properties and domains for policy compliance, including compliance with restrictions on prohibited content. In this review, Microsoft Advertising also considers feedback from its advertisers to help ensure a safe environment for the delivery of their advertisements and maintains a review process to investigate related advertiser complaints. Publishers are promptly notified of properties or domains that violate Microsoft Advertising's policies; such properties and domains are not approved by Microsoft for live ad traffic. If a property or domain is already live, and later found in violation of Microsoft Advertising's policies, it is removed from the network until the publisher remedies the issue.

As stated in our revised policies, "We may use a combination of internal signals and trusted third-party data or information sources to reject, block, or take down ads or sites that contain disinformation or send traffic to pages containing disinformation."

Total EU	-	-	-	-	-	Zero (0)	Zero (0)	130
Member States Global					Zero (0)	7ere (0)	Zero (0)	158
			barred			to policies	barred	barred
	reviews	policies	accounts	barred	Nr of policy reviews	update	accounts	domains
	Nr of policy	Nr of update to	Nr of	Nr of domains	1 31	Nr of	Nr of	Nr of
					Microsoft Advertising did reporting period. Therefore,			
					may be promoting them.			
SLI 1.2.1	zero.		•		domains across the entire network, irrespective of which ad account			
	Accordingly, the me	etrics for this SLI for the p	period 1 July – 3	31 December 2024 are	Microsoft Advertising did not bar any accounts during the relevant reporting period. This is because we take actions by blocking web			
	disinformation.				Microsoft Advertising did n	ot har any a	accounts during	the relevant
		publisher from the Linke	dIn Audience N	etwork for publishing	aggregate number of 158 ba	arred for the	current reporti	ng period.
	monetise content t	hey post to LinkedIn by	running ads a	gainst it and has not	globally, not at the Member	r State level,	we are providi	ng the global
	As stated in respo	onse to QRE 1.2.1, Link	kedIn does no	t allow members to	As reported in SLI 1.1.1, sind	ce Microsoft	: Advertising blo	ocks domains
	Methodology of da	ta measurement:			Methodology of data measu	ırement		
					influence related or non-cor			
					domains, based in part or		rces evaluation	ns as foreign
					strategic intelligence on o	domains. M	icrosoft Advert	ising actions
					Microsoft Advertising part	ners with t	hird parties as	sources for

Measure 1.3	LinkedIn	Microsoft Advertising
	LinkedIn provides a range of information and tools to give	Microsoft Advertising provides its customers with campaign reporting and
QRE 1.3.1	advertisers transparency and control regarding the placement of	functionalities to monitor and control ad placement across the Microsoft Advertising
QRE 1.5.1	their advertising. For example, for ads on the LinkedIn platform,	network. Such transparency controls are generally available via the campaign User
	LinkedIn publishes a Feed Brand Safety score for advertisers and the	Interface (UI) and through customer support. Transparency controls include:

public. The Feed Brand Safety score measures the number of ad impressions on the LinkedIn platform that appeared adjacent to – that is, immediately above or below within the LinkedIn feed – content removed for violating LinkedIn's Professional Community Policies, including disinformation. From 1 July through 31 December 2024, the Feed Brand Safety score was 99%+ safe. More information about LinkedIn's Feed Brand Safety Score is available <a href="here">here</a>.

In addition, LinkedIn publishes for advertisers and the public a semiannual transparency report, which discloses the amount of violating member content, including misinformation, that LinkedIn removed from the platform during the period. For the period from 1 January to 30 June 2024, for example, LinkedIn removed 30,497 pieces of misinformation from the platform. LinkedIn's most recent transparency report is available <a href="https://example.com/hem-example-report-r

For ads on the LinkedIn Audience Network, as discussed in QRE 1.2.1, LinkedIn provides tools to assist advertisers in controlling where their ads appear within the network. For example, advertisers can set up category-level blocking based on the Interactive Advertising Bureau's (IAB) publisher category taxonomy to prevent their ads from running on certain types of publishers within the network. Similarly, advertisers can review the list of publishers within the network and create custom allow lists and block lists to ensure their ads are placed on apps and sites that meet an advertiser's specific standards.

- Ad delivery reports at the domain level: data reports show the website/domain where the ads are served.
- Site exclusions: ability to exclude certain websites/domains from the ad campaigns to prevent ads from serving on such websites.
- Negative keywords exclusions: ability to exclude certain keywords from the ad campaigns to prevent ads from serving against search queries containing such keywords.
- Syndication Publisher Network Opt-Out: ability to prevent any ad delivery on the extended publisher network. In which case, all ads will serve on owned and operated properties.

#### Measure 1.4

**QRE 1.4.1** 

#### LinkedIn

### This Measure is not relevant or pertinent for LinkedIn as it does not buy advertising on behalf of others, inclusive of advertisers, and

#### **Microsoft Advertising**

This measure is not relevant or pertinent to Microsoft Advertising as it does not buy advertising, inclusive of advertisers, and agencies.

Measure 1.5	LinkedIn	Microsoft Advertising
QRE 1.5.1	As indicated in response to QRE 1.2.1, LinkedIn does not offer a content monetisation or an ad revenue share program to members. Thus, no member content is monetised or demonetised, and there is no ability for a member publishing disinformation on LinkedIn to collect advertising revenue share. As a result, LinkedIn has not undertaken independent third-party audits relative to monetisation and disinformation.	This measure is not relevant or pertinent to Microsoft Advertising, as it does not produce first party reporting. Please see QRE 1.5.2 for the relevant actions.
QRE 1.5.2	Not applicable.	Microsoft Advertising undergoes yearly Media Rating Council (MRC) accreditations via third-party audit. The MRC accreditation certifies Microsoft Advertising's click measurement systems adheres to the industry standards for counting ad clicks and the processes supporting this technology are accurate. Here is the Microsoft Advertising's MRC accreditation letter. This article provides a summary of the click measurement processes and methods Microsoft Advertising employs to measure and count clicks. For additional information, please visit the IAB/MRC click measurement guidelines.  Microsoft Adverting undergoes yearly audit by the Network Advertising Initiative (NAI) as part of the annual member's compliance review process.
Measure 1.6	LinkedIn	Microsoft Advertising
QRE 1.6.1	LinkedIn has integrated a number of brand safety tools and services to help advertisers understand and control the placement of their advertising and help avoid the placement of advertising next to disinformation content and/or in places or sources that repeatedly publish disinformation.  First, it's worth noting that LinkedIn endeavours to limit the disinformation that may appear on its platform in the first place. As set out in response to QREs 17.1.1 / 18.1.3 / 18.2.1 / 23.2.1, LinkedIn has implemented automated and manual systems and processes to detect and remove content that violates our policies, including disinformation, and to take action on violative content when it's	As described in QRE 1.2.1, Microsoft Advertising partners with third parties as sources and references for strategic intelligence on foreign influence related or non-compliant domains. Microsoft Advertising is actioning domains based in part on information from these third parties.  Please see QRE 1.3.1 for transparency and control functionalities.

	reported to us. Further, LinkedIn limits and controls the publishers that are included in the LinkedIn Audience Network, discussed in response to QRE 1.2.1.  Second, LinkedIn has partnered with third parties, such as Integral Ad Science and DoubleVerify, to evaluate and filter advertising inventory on LinkedIn Audience Network publisher sites that falls short of standards, such as brand safety floors. These partners help evaluate and filter third-party publisher advertising inventory before a bid is placed, and decrease instances when an ad may run on an unsafe or low-quality page.  In addition, LinkedIn has implemented a Brand Safety Hub within LinkedIn Campaign Manager. As part of the hub, advertisers can control what publisher apps and sites their ads appear on within the LinkedIn Audience Network. For example, advertisers can create custom block lists and allow lists of publisher sites within the LinkedIn Audience Network that meet an advertiser's specific standards. Similarly, advertisers can apply third-party brand safety tools to their campaigns, including DoubleVerify brand suitability profiles.	
QRE 1.6.2	This QRE is not relevant or pertinent for LinkedIn as it does not buy advertising on behalf of others, inclusive of advertisers, and agencies.	This QRE is not relevant or pertinent as Microsoft Advertising does not buy advertising.
QRE 1.6.3	This QRE is not relevant or pertinent as LinkedIn is not a brand safety tool provider.	This QRE is not relevant or pertinent as Microsoft Advertising is not a brand safety tool provider.
QRE 1.6.4	This QRE is not relevant or pertinent as LinkedIn is not a ratings service.	This QRE is not relevant or pertinent as Microsoft Advertising is not a ratings service.
SLI 1.6.1	Methodology of data measurement: Not applicable.	Methodology of data measurement: N/A

# **II. Scrutiny of Ad Placements**

## Commitment 2

Relevant Signatories participating in advertising commit to prevent the misuse of advertising systems to disseminate Disinformation in the form of advertising messages.

	C.2	M 2.1	M 2.2	M 2.3	M 2.4
We signed up to	LinkedIn	LinkedIn	LinkedIn	LinkedIn	LinkedIn
the following	Microsoft	Microsoft Advertising	Microsoft Advertising	Microsoft Advertising	Microsoft Advertising
measures of this	Advertising				
commitment:					

	LinkedIn	Microsoft Advertising
In line with this commitment, did you deploy new implementation measures (e.g. changes to	No	Yes
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable.	Microsoft Advertising implemented the following measures:
		- Iterated on its automated
		detection mechanisms
		<ul> <li>Improve AI model to detect clickbait and low-quality ads</li> </ul>
		<ul> <li>Continue expanding to multiple internal domain trust signals</li> </ul>
		as well as partner
		signals to make

		domain detection
		more robust
Do you plan to put further implementation measures in place in the next 6 months to	Yes	Yes
substantially improve the maturity of the implementation of this commitment? [Yes/No]		
If yes, which further implementation measures do you plan to put in place in the next 6	Planned Implementation Measures	Planned Implementation Measures
months?		
	LinkedIn plans to continue to	Microsoft Advertising plans to
	assess its policies and services and	continue to assess its policies and
	to update them as warranted.	services and to update them as
		warranted.

Measure 2.1	LinkedIn	Microsoft Advertising
QRE 2.1.1	As noted in response to QRE 1.1.1, LinkedIn prohibits misinformation and disinformation on its platform, whether in the form of organic content or in the form of advertising content. LinkedIn's Professional Community Policies, which apply to all content on the platform, expressly prohibit false and misleading content, including misinformation and disinformation:  - Do not share false or misleading content. Do not share content that is false, misleading, or intended to deceive. Do not share content to interfere with or improperly influence an election or other civic process. Do not share content that directly contradicts guidance from leading global health organisations and public health authorities; including false information about the safety or efficacy of vaccines or medical treatments. Do not share content or endorse someone or something in exchange for personal benefit (including personal or family relationships, monetary payment, free products or services, or other value), unless you have included a clear and conspicuous notice of the personal	As described in QRE 2.2.1, Microsoft Advertising employs a set of policies that prohibit advertising content that is misleading, deceptive, fraudulent, or harmful, including misinformation and disinformation.  In December 2022, Microsoft Advertising rolled out revised network-wide policies to avoid the publishing and carriage of harmful Disinformation and the placement of advertising next to Disinformation content. Such policies prohibit ads or sites that contain or lead to Disinformation. To enforce this policy, "We may use a combination of internal signals and trusted third-party data or information sources to reject, block, or take down ads or sites that contain disinformation or send traffic to pages containing disinformation. We may block at the domain level landing pages or sites that violate this policy." Please see <a href="here">here</a> for our main policy page.

benefit you receive and have otherwise complied with our Advertising Policies. LinkedIn provides specific examples of false and misleading content that violates its policy via a Help Center article on False or Misleading Content. LinkedIn's Advertising Policies incorporate the Professional Community Policies provision, and similarly prohibit misinformation and disinformation. In addition, LinkedIn's Advertising Policies separately prohibit fraudulent and deceptive ads, and require that claims in an ad have factual support: Fraud and Deception: Ads must not be fraudulent or deceptive. Your product or service must accurately match the content of your ad. Any claims in your ad must have factual support. Do not make deceptive or inaccurate claims about competitive products or services. Do not imply you or your product are affiliated with or endorsed by others without their permission. Additionally, make sure to disclose any pertinent partnerships when sharing advertising content on LinkedIn. Do not advertise prices or offers that are inaccurate – any advertised discount, offer or price must be easily discoverable from the link in your ad. Methodology of data measurement: Methodology of data measurement: SLI 2.1.1 -The table below reports the number of ads LinkedIn restricted under Microsoft Advertising assesses the impact of its actions by reporting on the ads **Numbers by** the misinformation policies in QRE 2.1.1 above between 1 July - 31 that were loaded in the Microsoft Advertising campaign system but that we actions blocked from being displayed across our network and estimating the number of December 2024, broken out by EEA Member State. enforcing individual ad impressions that such ads would have generated (i.e., ads that would policies above The metrics are assigned to EEA Member State based on the primary have been served to consumers). country targeting of the ad.

"Unique Ads" are the individual advertisements (or ad creatives) loaded in the No ads were restricted between 1 July – 31 December 2024. Microsoft Advertising campaign system that we blocked. During the reporting period, 2,193,970 ads were blocked globally (see "Global" total), including in all EEA The following factors may contribute to the number of ads reported Member States. For transparency purposes, the metrics mentioned in the table for by LinkedIn being low: each Member State are lower, as these are additional ads that were blocked in each LinkedIn is primarily a business-to-business advertising platform respective Member State. Hence the totals for ads blocked in the EU and EEA as a - that is, businesses marketing their products and services to whole, are in this instance larger than the Global total. other businesses and members in a professional capacity. Because of the business-to-business nature of LinkedIn's "Blocked Impressions" means the individual ad impressions that such Unique Ads advertising platform, ads on LinkedIn may cost more than ads would have generated if not blocked. placed in other settings, impacting the ads run on LinkedIn. "Unique Domains" means the web domain or URLs that the Unique Ads would have directed customers to. For example, if Advertiser A loads 10 ads in the campaign system promoting two websites associated with disinformation that would have been displayed 100 times, Microsoft Advertising will report 10 Unique Ads, 100 Blocked Impressions, and two Unique Domains. In practice, however, no consumer ever see any of these ads. "Account suspension" means suspending access to the Microsoft Advertising services to advertisers who willingly or repeatedly violate our terms or policies prohibiting phishing, malware, or payment Instrument fraud. Suspended customers cannot serve ads until they redress the violation. The number of ads Microsoft restricted under the misinformation policies in QRE The number of ads LinkedIn restricted under the misinformation 2.1.1 between July 1, 2024 - December 31, 2024. policies in QRE 2.1.1 between 1 July - 31 December 2024 Unique Ads **Blocked** Unique Account **Domains Impressions** suspension **Member States** 15,099,520 321 Austria 0 45,895 432 0 Belgium 13,602 16,341,515 489 679 Bulgaria 0 8,414 846,117 344 140 Croatia 0 5,557 589,799 254 25

Total EEA	0	2,687,055	339,909,383	11,651	24,714
Total EU	0	2,668,636	335,639,163	10,892	24,260
Global		2,193,970	-	-	-
Norway	0	13,590	3,895,944	411	426
Liechtenstein	0	1,058	61,850	126	5
celand	0	3,771	312,425	222	23
Sweden	0	13,051	7,940,119	464	551
Spain	0	18,471	19,365,688	605	2857
Slovenia	0	4,950	520,188	241	48
Slovakia	0	6,654	1,064,249	284	50
Romania	0	8,605	3,557,594	407	427
Portugal	0	11,122	6,574,294	452	235
Poland	0	10,657	5,351,377	464	1068
Netherlands	0	13,072	13,276,757	579	1511
Malta	0	4,377	274,817	241	27
Luxembourg	0	5,616	736,362	300	43
Lithuania	0	7,644	732,340	313	197
Latvia	0	5,296	418,449	254	97
taly	0	17,654	18,995,565	580	2022
Ireland	0	10,087	6,351,043	431	351
Hungary	0	8,412	1,381,649	336	61
Greece	0	6,960	1,554,682	375	290
Germany	0	184,877	169,260,210	735	7277
France	0	22,321	33,941,040	693	4378
Finland	0	9,004	2,929,201	348	556
Denmark Estonia	0 0	11,955 5,023	3,736,810 394,036	377 241	161
Czech Republic	0	9,385	4,020,308	368	453
Cyprus	0	6,005	385,434	285	139 296

Measure 2.2	LinkedIn	Microsoft Advertising	
	LinkedIn works with numerous partners to facilitate the flow of	Microsoft Advertising employs dedicated operational support and engineering	
	information to tackle purveyors of disinformation, including	resources to enforce its advertising policies detailed below, combining	
	disinformation spread by state-sponsored and institutional actors.	automated and manual enforcement methods to prevent or take down	
		advertisements that violate its policies. Every ad loaded into the Microsoft	
	LinkedIn maintains an internal Trust and Safety team composed of threat	Advertising system is subject to these enforcement methods, which leverage	
	investigators and intelligence analysts to address disinformation. This	machine-learning techniques, automated screening, the expertise of its	
	team works with peers and other stakeholders, including our Artificial	operations team, and dedicated user safety experts. In addition, Microsoft	
	Intelligence modeling team, to identify and remove nation-state actors	Advertising conducts a manual review of all advertisements flagged to its	
	and coordinated inauthentic campaigns. LinkedIn conducts investigations	customer support team and removes advertisements that violate its policies.	
	into election-related influence operations and nation-state targeting		
	including continued information sharing on threats with industry peers	As stated in our revised policies on Disinformation, "We may use a combination	
	and Law Enforcement on a regular basis. LinkedIn works with peer	of internal signals and trusted third-party data or information sources to reject,	
	companies and other stakeholders to receive and share indicators related	block, or take down ads or sites that contain disinformation or send traffic to	
	to fake accounts created by state-sponsored actors, such as confirmed	pages containing disinformation." Microsoft Advertising partners with third	
	Tactics, Techniques, and Protocols (TTPs) and Indicators of Compromise	parties as sources for strategic intelligence on domains. Microsoft Advertising	
QRE 2.2.1	(IOC). This exchange of information leads to a better understanding of the	actions domains, based in part on these sources evaluations as foreign influence	
	incentives of sophisticated and well-funded threat actors and how they	related or non-compliant	
	evolve their TTPs to achieve those goals, which assists LinkedIn in their		
	identification and removal. Any associated disinformation content is	In addition to the policy on Disinformation, Microsoft Advertising's Misleading	
	verified by our internal or external fact-checkers, and coordinated	Content Policies prohibit advertising content that is misleading, deceptive,	
	inauthentic behaviours (CIBs) are also removed by our Trust and Safety	fraudulent, or that can be harmful to users, including advertisements that	
	team.	contain unsubstantiated claims, or that falsely claim or imply endorsements or	
		affiliations with third party products, services, governmental entities, or	
	LinkedIn, along with its parent company, Microsoft, is heavily involved in	organisations. Microsoft Advertising also has a set of Relevance and Quality	
	threat exchanges. These threat exchanges take various forms, such as: 1)	Policies to manage the relevancy and quality of the advertisements that it serves	
	regular discussion amongst industry peers to discuss high-level trends	through its advertising network. These policies deter advertisers from luring	
	and campaigns; and, 2) one-on-one engagement with individual peer	users onto sites using questionable or misleading tactics (e.g., by prohibiting	
	companies to discuss TTPs and IOCs. This exchange of information leads	advertisements that lead users to sites that misrepresent the origin or intent of	
	to a better understanding of the incentives of sophisticated and well-	their content).	
	funded threat actors and how they evolve their TTPs to achieve those		
	goals, which assists us in their identification and removal.		

	LinkedIn always stands ready to receive and investigate any leads we receive from peers and other external stakeholders. In addition to one-on-one engagement with peers, we also consume intelligence from vendors and investigate any TTPs and IOCs made available in peer disclosures. In turn, we also regularly release information about disinformation on our platform in publicly-available transparency reports and blog posts.	
Measure 2.3	LinkedIn	Microsoft Advertising
QRE 2.3.1	All advertising that runs on LinkedIn's platform is subject to LinkedIn's Advertising Policies. LinkedIn has implemented both automated and manual systems to help ensure that advertising on the platform complies with its Advertising Policies, and that ads that do not comply with its policies are removed.  When an advertiser submits an advertising campaign, the campaign is evaluated by LinkedIn automated systems. If those systems determine a campaign may violate LinkedIn's policies, the campaign is rejected or forwarded to LinkedIn's advertising review team for manual review.  The advertising review team is trained in LinkedIn's Advertising Policies	Please see QRE 2.2.1. Microsoft Advertising blocks sites or domains that our Information Integrity expert partners deem as spreading Disinformation.  Microsoft Advertising also rejects all ads associated with such domains and instructs its publishing partners to block ads from showing on such domains.
	and dedicated to advertising review. LinkedIn also employs a dedicated team of trainers, who not only support the onboarding of new ad reviewers, but also provide ongoing educational opportunities for reviewers.  LinkedIn similarly employs quality assurance analysts, who provide one-on-one coaching, as well as regular monthly forums to discuss reviewers' most frequent challenges. For complex issues, reviewers have direct access to global advertising policy managers through regular office hours and dedicated escalation pathways.	

	LinkedIn members may also report ads that they believe violate LinkedIn's advertising policies, and when members report ads LinkedIn's advertising review team reviews them. To report an ad, members can click on the three-dot icon in the upper right-hand corner of every ad and select the "Hide or report this ad" option. Members are then directed to select a reporting reason, with "Misinformation" provided as a reporting option.	
SLI 2.3.1	Methodology of data measurement:  The table below reports metrics concerning ads LinkedIn restricted under the misinformation policies in QRE 2.1.1. The metrics include: (1) the number of ads LinkedIn restricted under the misinformation policies in QRE 2.1.1 between 1 July - 31 December 2024, broken out by EEA Member State; (2) the number of impressions those ads received before they were restricted. The metrics are assigned to EEA Member States based on the primary country targeting of the ad.  No ads were restricted under the misinformation policies in QRE 2.1.1 between 1 July - 31 December 2024.  The following factors may contribute to the number of ads reported by LinkedIn being lower than other platforms:  - LinkedIn is primarily a business-to-business advertising platform that is, businesses marketing their products and services to other businesses and members in a professional capacity.  - Because of the business-to-business nature of LinkedIn's advertising platform, ads on LinkedIn may cost more than ads on other platforms, impacting the ads run on LinkedIn.	Methodology of data measurement:  Microsoft Advertising removed ads after the ads were shown to consumers during the relevant reporting period. Since we remove ads running in all countries, the "Nr. of ads removed" count is the same across all Member States. The low figures are due to the proactive nature of our actions, since we block most disinformation content before it is shown to consumers.  Please see SLI 2.1.1 (Unique Ads) for the number of ads prohibited.

	The number of ads LinkedIn	The number of impressions the	Nr of ads removed (as well as reach of	Nr of ads prohibited (same as
	restricted under the misinformation	ads received before they were	ads before they were successfully	Unique Ads in SLI 2.1.1)
	policies in QRE 2.1.1 between 1 July – 31 December 2024	restricted	removed)	
Member				
States				
Austria	0	0	2,527	2,239,865
Belgium	0	0	2,527	2,207,572
Bulgaria	0	0	2,527	2,202,384
Croatia	0	0	2,527	2,199,527
Cyprus	0	0	2,527	2,199,975
Czech Republic	0	0	2,527	2,203,355
Denmark	0	0	2,527	2,205,925
Estonia	0	0	2,527	2,198,993
Finland	0	0	2,527	2,202,974
France	0	0	2,527	2,216,291
Germany	0	0	2,527	2,378,847
Greece	0	0	2,527	2,200,930
Hungary	0	0	2,527	2,202,382
Ireland	0	0	2,527	2,204,057
Italy	0	0	2,527	2,211,624
Latvia	0	0	2,527	2,199,266
Lithuania	0	0	2,527	2,201,614
Luxembourg	0	0	2,527	2,199,586
Malta	0	0	2,527	2,198,347
Netherlands	0	0	2,527	2,207,042
Poland	0	0	2,527	2,204,627
Portugal	0	0	2,527	2,205,092
Romania	0	0	2,527	2,202,575
Slovakia	0	0	2,527	2,200,624
Slovenia	0	0	2,527	2,198,920

Spain	0	0	2,527	2,212,441
Sweden	0	0	2,527	2,207,021
Iceland	0	0	2,527	2,197,741
Liechtenstein	0	0	2,527	2,195,028
Norway	0	0	2,527	2,207,560
Total EU	0	0	2,527	59,711,856
Total EEA	0	0	2,527	66,312,185

Measure 2.4	LinkedIn	Microsoft Advertising
	When LinkedIn rejects or restricts an ad for violation of its policies, as	Microsoft Advertising notifies its advertiser customers of policy violations
	described in QRE 2.3.1, LinkedIn sends the advertiser an email	through the following:
	notification. The email notification outlines the rejection reason and	- Prompts in the campaign User Interface (UI)
	advertising policy that the ad has violated.	- Email notifications (for example, for account suspension)
		- Notifications from the assigned Account representatives, as applicable
	The notification also provides advertisers instructions regarding how	
	they can address the violation, including by revising the ad in LinkedIn	Advertisers may appeal an editorial decision through the conflict-resolution
	Campaign Manager to address the violations, or by contacting their	process described here: How do I challenge a disapproval? (microsoft.com)
	sales representative or LinkedIn customer support if they require	
QRE 2.4.1	clarification or believe there has been a mistake.	
QILL ZT. I		
	Because advertisers can address rejections a number of ways – by	
	revising and resubmitting the advertisement, by creating a new	
	advertisement that complies with LinkedIn's policies, or by contacting	
	their LinkedIn sales representative or customer support – LinkedIn does	
	not report "appeal" and "appeal grant" metrics for ad rejections.	
	LinkedIn has provided metrics on the number of ad restrictions as part	
	of SLI 2.3.1 above.	
SLI 2.4.1	Methodology of data measurement:	Methodology of data measurement:

Global	N/A	a change of the initial decision	4,999	change of the initial decision  3,242
	Nr of appeals	Proportion of appeals that led to	Nr of appeals	Proportion of appeals that led to a
	above.		appeals during the relevant reporting p	period.
	provided metrics on the number of ad restrictions as part of SLI 2.3.1		of its services. We are providing the aggregate global value of 4,999 total	
	rejections as outlined in our response to QRE 2.4.1. LinkedIn has		level) in the aggregate and not at the Member State level due to the nature	
	LinkedIn does not report "appeal" and "appeal grant" metrics for ad N		Microsoft Advertising tracks appeals	(at advertising creative and keyword

# **II. Scrutiny of Ad Placements**

## Commitment 3

Relevant Signatories involved in buying, selling and placing digital advertising commit to exchange best practices and strengthen cooperation with relevant players, expanding to organisations active in the online monetisation value chain, such as online e-payment services, e-commerce platforms and relevant crowd-funding/donation systems, with the aim to increase the effectiveness of scrutiny of ad placements on their own services.

	C.3	M 3.1	M 3.2	M 3.3
We signed up to the	LinkedIn	LinkedIn	LinkedIn	LinkedIn
following measures of	Microsoft	Microsoft Advertising	Microsoft Advertising	Microsoft Advertising
this commitment:	Advertising			

	LinkedIn	Microsoft Advertising
In line with this commitment, did you deploy new implementation measures (e.g., changes to	No	No
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	Not applicable	New Implementation Measures
		Not applicable
Do you plan to put further implementation measures in place in the next 6 months to	No	No
substantially improve the maturity of the implementation of this commitment? [Yes/No]		

If yes, which further implementation measures do you plan to put in place in the next 6	Planned Implementation Measures	Planned Implementation Measures
months?	Not applicable	Not applicable

Measure 3.1	LinkedIn	Microsoft Advertising
Measure 3.1  QRE 3.1.1	As discussed as part of QRE 2.2.1, LinkedIn works with numerous partners to facilitate the flow of information to tackle purveyors of disinformation, including disinformation spread by state-sponsored and institutional actors.  LinkedIn maintains an internal Trust and Safety team composed of threat investigators and intelligence analysts to address disinformation. This team works with peers and other stakeholders, including our Artificial Intelligence modelling team, to identify and remove nation-state actors and coordinated inauthentic campaigns. LinkedIn conducts investigations into election-related influence operations and nation-state targeting including continued information sharing on threats with industry peers and Law	Microsoft Advertising partners with third parties as sources for strategic intelligence on domains. Microsoft Advertising actions domains, based in part on these sources evaluations as foreign influence related or noncompliant.  Microsoft Advertising is a member and an active participant in several trade groups, including the IAB and EDAA.  As part of the broader Microsoft engagements, Microsoft Advertising participates in threat exchange discussions with industry peers and trusted third parties which increase the effectiveness of our enforcement actions.
	Enforcement on a regular basis. LinkedIn works with peer companies and other stakeholders to receive and share indicators related to fake accounts created by state-sponsored actors, such as confirmed Tactics, Techniques, and Protocols (TTPs) and Indicators of Compromise (IOC). This exchange of information leads to a better understanding of the incentives of sophisticated and well-funded threat actors and how they evolve their TTPs to achieve those goals, which assists LinkedIn in their identification and removal. Any associated disinformation content is verified by our internal or external fact-checkers, and coordinated inauthentic behaviours (CIBs) are also removed by our Trust and Safety team.	

	LinkedIn, along with its parent company, Microsoft, is heavily involved in threat exchanges. These threat exchanges take various forms, such as: 1) regular discussion amongst industry peers to discuss high-level trends and campaigns; and, 2) one-on-one engagement with individual peer companies to discuss TTPs and IOCs. This exchange of information leads to a better understanding of the incentives of sophisticated and well-funded threat actors and how they evolve their TTPs to achieve those goals, which assists us in their identification and removal.  LinkedIn always stands ready to receive and investigate any leads we	
	one-on-one engagement with peers, we also consume intelligence from vendors and investigate any TTPs and IOCs made available in peer disclosures. In turn, we also regularly release information about disinformation on our platform in publicly-available transparency reports and blog posts.	
Measure 3.2	LinkedIn	Microsoft Advertising
QRE 3.2.1	Please see the response to QRE 3.1.1.	Please see the response to QRE 3.1.1.
Measure 3.3	LinkedIn	Microsoft Advertising
QRE 3.3.1	Please see the response to QRE 3.1.1. In addition, as discussed in response to QRE 1.6.1, LinkedIn partners with companies including Integral Ad Science and DoubleVerify to help evaluate and filter advertising inventory on LinkedIn Audience Network publisher sites that falls short of standards, such as brand safety floors.	Please see the response to QRE 3.1.1.

# III. Political Advertising

Commitments 4 - 13

	III. Political Advertising				
	Commitment 4  Relevant Signatories commit to adopt a common definition of "political and issue advertising".				
	C.4 M 4.1 M 4.2				
We signed up to the following measures of this commitment:	LinkedIn Microsoft Advertising	LinkedIn Microsoft Advertising	LinkedIn Microsoft Advertising		

	LinkedIn	Microsoft Advertising
In line with this commitment, did you deploy new implementation measures	No	No
(e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable.	Not applicable.
Do you plan to put further implementation measures in place in the next 6	No	No
months to substantially improve the maturity of the implementation of this		
commitment? [Yes/No]		
If yes, which further implementation measures do you plan to put in place in	Planned Implementation Measures	Planned Implementation Measures
the next 6 months?	Fiantieu impiementation Measures	rianned implementation weasures
the next o months:	Not applicable.	Not applicable.

Measure 4.1	LinkedIn	Microsoft Advertising
Measure 4.2	LinkedIn	Microsoft Advertising
QRE 4.1.1 (for	LinkedIn's Advertising Policies do not allow political advertising, and	Microsoft Advertising policies prohibit ads for election-related content,
measures 4.1 and 4.2)	LinkedIn has not allowed political advertising since 2018.	political candidates, parties, ballot measures and political fundraising

Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome" and "ads fundraising for or by political candidates, parties, political action committees or similar organisations, or ballot propositions." In addition, LinkedIn's Advertising Policies prohibit certain types of advertisements that might be considered issue based. For example, "ads exploiting a sensitive political issue even if the advertiser has no explicit political agenda" are also prohibited.

globally. Similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve advertisements on their platforms benefit from these robustly enforced set of policies.

Furthermore, Microsoft prohibits political advertising across Microsoft media properties and platforms. Microsoft Advertising's policies also prohibit certain types of advertisements that might be considered issue-based. More specifically, "advertising that exploits political agendas, sensitive political issues or uses 'hot button' political issues or names of prominent politicians is not allowed regardless of whether the advertiser has a political agenda," and "advertising that exploits sensitive political [or religious] issues for commercial gain or promote extreme political [or extreme religious] agendas or any known associations with hate, criminal or terrorist activities" is also prohibited.

As stated in our revised policies, "We may use a combination of internal signals and trusted third-party data or information sources to reject, block, or take down ads or sites that contain disinformation or send traffic to pages containing disinformation."

Microsoft Advertising partners with third parties as sources for strategic intelligence on domains. Microsoft Advertising actions domains, based in part on these sources evaluations as foreign influence related or non-compliant.

#### See here:

<u>Microsoft Advertising - Restricted Content - Political Content</u> and <u>Microsoft Advertising - Restricted Content - Religious Content</u>

QRE 4.1.2 (for measures 4.1 and 4.2)

Microsoft looks forward to the full entry into application of the Regulation on Transparency and Targeting of Political Advertising

Microsoft looks forward to the full entry into application of the Regulation on Transparency and Targeting of Political Advertising and the associated

and	d the associated upcoming common guidance to be issued in	upcoming common guidance to be issued in accordance with Art. 8.2 of the
acc	cordance with Art. 8.2 of the Regulation.	Regulation.

# III. Political Advertising

# Commitment 5

Relevant Signatories commit to apply a consistent approach across political and issue advertising on their services and to clearly indicate in their advertising policies the extent to which such advertising is permitted or prohibited on their services.

	C.5	M 5.1
We signed up to the following	LinkedIn	LinkedIn
measures of this commitment:	Microsoft Advertising	Microsoft Advertising

	LinkedIn	Microsoft Advertising
In line with this commitment, did you deploy new implementation measures (e.g.	No	No
changes to your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable.	Not applicable.
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	No	No
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures	Planned Implementation Measures
	Not applicable as LinkedIn currently prohibits all political	Not applicable as Microsoft Advertising currently prohibits all political advertising, as outlined under QRE 5.1.1.

advertising, as outlined under QRE	
5.1.1.	

QRE 5.1.1 LinkedIn's <u>Advertising Policies</u> do not allow political advertising, and Mi	
Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome" and "ads fundraising for or by political candidates, parties, political action committees or similar organisations, or ballot propositions." In addition, LinkedIn's Advertising Policies prohibit certain types of advertisements that might be considered issue based. For example, "ads exploiting a sensitive political issue even if the advertiser has no explicit political agenda" are also prohibited.  Ser production of the proposition of propositions and proposition of propositions and proposition of propositio	Microsoft Advertising policies prohibit ads for election-related content, political candidates, parties, ballot measures and political fundraising globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve advertisements on their platforms benefit from these robustly enforced set of policies.  Furthermore, Microsoft prohibits political advertising across Microsoft media properties and platforms. Microsoft Advertising's policies also prohibit certain types of advertisements that might be considered issuebased. More specifically, "advertising that exploits political agendas, sensitive political issues or uses 'hot button' political issues or names of prominent politicians is not allowed regardless of whether the advertiser has a political agenda," and "advertising that exploits sensitive political [or religious] issues for commercial gain or promote extreme political or extreme religious agendas or any known associations with hate, criminal or terrorist activities" is also prohibited.  See here:  Microsoft Advertising - Restricted Content - Political content and Microsoft

# **III. Political Advertising**

#### Commitment 6

Relevant Signatories commit to make political or issue ads clearly labelled and distinguishable as paid-for content in a way that allows users to understand that the content displayed contains political or issue advertising

	C.6	M 6.1	M 6.2	M 6.3	M 6.4	M 6.5
We signed up to the following	Commitment 6 is not relevant or pertinent for LinkedIn and Microsoft Advertising as	N/A	N/A	N/A	N/A	N/A
measures of this commitment:	they do not allow political or issue-based advertising as set out in more detail under					
	measure 5.1.					

# **III. Political Advertising**

#### Commitment 7

Relevant Signatories commit to put proportionate and appropriate identity verification systems in place for sponsors and providers of advertising services acting on behalf of sponsors placing political or issue ads. Relevant signatories will make sure that labelling and user-facing transparency requirements are met before allowing placement of such ads.

	C.7	M 7.1	M 7.2	M 7.3	M 7.4
We signed up to the following	LinkedIn	N/A	N/A	LinkedIn	N/A
measures of this commitment:	Microsoft Advertising			Microsoft Advertising	

	LinkedIn	Microsoft Advertising
In line with this commitment, did you deploy new implementation measures (e.g. changes to	No	No
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable	Not applicable

Do you plan to put further implementation measures in place in the next 6 months to	No	No
substantially improve the maturity of the implementation of this commitment? [Yes/No]		
If yes, which further implementation measures do you plan to put in place in the next 6	Planned Implementation Measures	Planned Implementation Measures
months?	Not applicable	Not applicable

Measure 7.3	LinkedIn	Microsoft Advertising
QRE 7.3.1	As set out in QRE 5.1.1, LinkedIn's Advertising Policies prohibit	As set out in QRE 5.1.1, Microsoft Advertising prohibits ads for election-
	political advertising. Before submitting a campaign, customers must	related content, political candidates, parties, ballot measures and political
	agree that their ad complies with LinkedIn's policies.	fundraising globally; similarly, ads aimed at fundraising for political
		candidates, parties, political action committees ("PACs"), and ballot
	As detailed in QRE 2.3.1, LinkedIn has implemented both automated	measures also are barred. All Microsoft and third-party services that rely on
	and manual systems to help ensure that advertising on the platform	Microsoft Advertising to serve advertisements on their platforms benefit
	complies with its Advertising Policies, and that ads that do not comply	from these robustly enforced set of policies.
	with its policies are removed. These enforcement systems apply	
	equally to prohibited political advertising, as well as other violations	Furthermore, Microsoft Advertising's policies also prohibit certain types of
	of LinkedIn's Advertising Policies.	advertisements that might be considered issue-based. More specifically,
		"advertising that exploits political agendas, sensitive political issues or uses
	In addition to LinkedIn's pre-emptive enforcement, LinkedIn	'hot button' political issues or names of prominent politicians is not allowed
	members may also report ads that they believe violate LinkedIn's	regardless of whether the advertiser has a political agenda," and "advertising
	advertising policies, and when members report ads LinkedIn's	that exploits sensitive political [or religious] issues for commercial gain or
	advertising review team reviews them. To report an ad, members can	promote extreme political or extreme religious agendas or any known
	click on the three-dot icon in the upper right-hand corner of every ad	associations with hate, criminal or terrorist activities" is also prohibited. In
	and select the "Hide or report this ad" option.	addition, to comply with local laws in Canada and France, Microsoft
		Advertising has prohibited advertising content related to debates of general
		interest linked to an electoral campaign in those jurisdictions.
		See here:
		Microsoft Advertising - Restricted Content - Political content and Microsoft
		<u>Advertising – Restricted Content - Religious Content</u>

# As set out in QRE 5.1.1, LinkedIn's Advertising Policies prohibit political advertising. Ads that do not comply with LinkedIn's Advertising Policies are removed.

Microsoft Advertising does not offer its advertising services to customers or partners that may promote political content. For example, a political party would be made aware by our customer support team that it cannot run political ads campaigns through our ad network.

Microsoft Advertising employs dedicated operational support and engineering resources to enforce restrictions on political advertising using a combination of proactive and reactive mechanisms. On the proactive side, Microsoft Advertising has implemented several processes designed to identify and block political ads from showing across its advertising network, including restrictions on certain terms and from certain domains. For example, we compile a list of terms comprised of known political parties, candidates, and ballot measures and block any ads that may be otherwise shown on a search engine search for such terms. On the reactive side, if Microsoft Advertising becomes aware that an ad suspected of violating its policies is being served to our publishers—for instance, because a user flagged that ad to our customer support team—the offending ad is promptly reviewed. If it violates our policies, we will take it down. Users can report advertising that may be in violation of the Microsoft Advertising policies through the publisher-specific reporting form or via this form: Low quality ad submission & escalation - Microsoft Advertising

The above actions apply across all the websites that use Microsoft Advertising to serve ads on their properties, whether owned and operated by Microsoft (like Bing) or third-party websites.

	III. Political Advertising			
	Commitment 8			
Relevant Signato	Relevant Signatories commit to provide transparency information to users about the political or issue ads they see on their service.			
		M 8.1	M 8.2	
We signed up to the following	Commitment 8 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow political or	N/A	N/A	
measures of this commitment:	issue-based advertising as set out in more detail under measure 5.1.			

	III. Political Advertising			
	Commitment 9			
Relevant Signatories comm	Relevant Signatories commit to provide users with clear, comprehensible, comprehensive information about why they are seeing a political or issue ad.			
	C.9	M 9.1	M 9.2	
We signed up to the following	Commitment 9 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow political or	N/A	N/A	
measures of this commitment:	issue-based advertising as set out in more detail under measure 5.1.			

	III. Political Advertising			
	Commitment 10			
•	Relevant Signatories commit to maintain repositories of political or issue advertising and ensure their currentness, completeness, usability and quality, suc that they contain all political and issue advertising served, along with the necessary information to comply with their legal obligations and with transparence			
commitments under this Cod	commitments under this Code.			
	C.10 M 10.1 M 10		M 10.2	
We signed up to the following	Commitment 10 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow political or	N/A	N/A	
measures of this commitment:	issue-based advertising as set out in more detail under measure 5.1.			

# **III. Political Advertising**

#### Commitment 11

Relevant Signatories commit to provide application programming interfaces (APIs) or other interfaces enabling users and researchers to perform customised searches within their ad repositories of political or issue advertising and to include a set of minimum functionalities as well as a set of minimum search criteria for the application of APIs or other interfaces."

C.11	M 11.1	M 11.2	M 11.3	M 11.4
Commitment 11 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they	N/A	N/A	N/A	N/A
do not allow political or issue-based advertising as set out in more detail under measure 5.1.				

# **III. Political Advertising**

#### Commitment 12

Relevant Signatories commit to increase oversight of political and issue advertising and constructively assist, as appropriate, in the creation, implementation and improvement of political or issue advertising policies and practices.

	C.12	M 12.1	M 12.2	M 12.3
We signed up to the following	Commitment 12 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow	N/A	N/A	N/A
measures of this commitment:	political or issue-based advertising as set out in more detail under measure 5.1.			

## **III. Political Advertising**

### Commitment 13

Relevant Signatories agree to engage in ongoing monitoring and research to understand and respond to risks related to Disinformation in political or issue advertising.

	C.13	M 13.1	M 13.2	M 13.3
We signed up to the following	Commitment 13 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow	N/A	N/A	N/A
measures of this commitment:	political or issue-based advertising as set out in more detail under measure 5.1.			

# IV. Integrity of Services

Commitments 14 - 16

# **IV. Integrity of Services**

#### Commitment 14

In order to limit impermissible manipulative behaviours and practices across their services, Relevant Signatories commit to put in place or further bolster policies to address both misinformation and disinformation across their services, and to agree on a cross-service understanding of manipulative behaviours, actors and practices not permitted on their services. Such behaviours and practices, which should periodically be reviewed in light with the latest evidence on the conducts and TTPs employed by malicious actors, such as the AMITT Disinformation Tactics, Techniques and Procedures Framework, include:

The following TTPs pertain to the creation of assets for the purpose of a disinformation campaign, and to ways to make these assets seem credible:

- 1. Creation of inauthentic accounts or botnets (which may include automated, partially automated, or non-automated accounts)
- 2. Use of fake / inauthentic reactions (e.g. likes, up votes, comments)
- 3. Use of fake followers or subscribers
- 4. Creation of inauthentic pages, groups, chat groups, fora, or domains
- 5. Account hijacking or impersonation

The following TTPs pertain to the dissemination of content created in the context of a disinformation campaign, which may or may not include some forms of targeting or attempting to silence opposing views. Relevant TTPs include:

- 6. Deliberately targeting vulnerable recipients (e.g. via personalized advertising, location spoofing or obfuscation)
- 7. Deploy deceptive manipulated media (e.g. "deep fakes", "cheap fakes"...)
- 8. Use "hack and leak" operation (which may or may not include doctored content)
- 9. Inauthentic coordination of content creation or amplification, including attempts to deceive/manipulate platforms algorithms (e.g. keyword stuffing or inauthentic posting/reposting designed to mislead people about popularity of content, including by influencers)
- 10. Use of deceptive practices to deceive/manipulate platform algorithms, such as to create, amplify or hijack hashtags, data voids, filter bubbles, or echo chambers
- 11. Non-transparent compensated messages or promotions by influencers
- 12. Coordinated mass reporting of non-violative opposing content or accounts

	C.14	M 14.1	M 14.2	M 14.3
We signed up to the following	LinkedIn	LinkedIn	LinkedIn	LinkedIn
measures of this commitment:	Bing Search	Bing Search	Bing Search	Bing Search

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to	No	Yes
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable	During the reporting period
		Microsoft continued piloting
		Content Integrity Tools, which
		allowed users to add content
		credentials to their own authentic
		content. Designed as a pilot
		program primarily to support the
		2024 election cycle and gather
		feedback about Content
		Credentials-enabled tools, during
		the reporting period of this report,
		the tools were available to political
		campaigns in the EU, as well as to
		elections authorities and select news
		media organizations in the EU and
		globally. These tools included a
		partnership and collaboration with
		fellow Tech Accord signatory,
		TruePic. Announced in April 2024,
		this collaboration leveraged
		TruePic's mobile camera SDK
		enabling campaign, election, and
		media participants to capture

		authentic images, videos and audio directly from a vetted and secure device. Called the "Content Integrity Capture App" (an app that makes it easy to directly capture images with C2PA enabled signing) launched for both Android and Apple and can be used by participants in the Content Integrity Tools pilot program.
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	No	No
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures  Not applicable	Planned Implementation Measures  Not applicable

Measure 14.1	LinkedIn	Bing Search
QRE 14.1.1	LinkedIn's User Agreement (in particular section 8 LinkedIn "Dos and	Bing Search is an online search engine, the primary purpose of which is to
	Don'ts") and our Professional Community Policies - which are	provide a searchable index of webpages available on the internet to help
	accepted by every member when joining LinkedIn - detail the	users find the content they are looking for. Bing Search does not host the
	impermissible manipulative behaviours and practices that are	content or control the operation, content, or design of indexed websites.
	prohibited on our platform. Fake accounts, misinformation, and	Users come to Bing Search with a specific research topic in mind and expect
	inauthentic content are not allowed, and we take active steps to	Bing to provide links to the most relevant and authoritative third-party
	remove it from our platform.	websites on the Internet that are responsive to their search terms. Bing
		Search does not allow users to post and share content or otherwise enable
	LinkedIn provides additional specific examples of false and	content to go "viral" through user-to-user exchanges of information on Bing.
	misleading content that violates its policy via a Help Center article on	
	False or Misleading Content.	As such, addressing misinformation in organic search results often requires
		a different approach than may be appropriate for other types of online
		services. The majority of the TTPs (namely, TTPs 1-9 and 11-12) are more

pertinent to social media or account-driven services in that they specifically relate to user accounts, subscribers/followers, inauthentic coordination, influencers, or targeting users of a service, account hijacking, etc., and thus are not relevant to search engines.

The highest potential for abuse in web search arises under TTP 10, which involves "use of deceptive practices to deceive/manipulate platform algorithms, such as by exploiting data voids, spam tactics, or keyword stuffing." Therefore, relevant Bing Search policies and practices that help combat manipulative behaviors primarily address TTP Number 10.

Although as a search engine Bing does not have any control over third party websites appearing in search results, Bing's ranking algorithms, spam policies, and other safeguards described below can also address and mitigate the risks arising from malicious websites that use other TTPs attempting to manipulate our search engine rankings. For example, pages employing social media schemes (e.g., fake followers – TTP 3), using inauthentic domains (TTP 4), or keyword stuffing (TTP 9) are considered abusive practices that are addressed in Bing's ranking system and Webmaster Guidelines. In addition, in connection with generative Al features, Microsoft has implemented measures intended to address TTP No. 7 (related to deceptive deepfakes), which are discussed in more detail below.

Bing's primary mechanism for combatting manipulative behaviors in search results is via its ranking algorithms and systems designed to identify and combat attempts to abuse search engine optimization techniques (i.e., spam). Bing Search describes the main parameters of its ranking systems in depth in <a href="How Bing Delivers Search Results">How Bing Delivers Search Results</a>. Abusive techniques and examples of prohibited SEO activities are described in more detail in the <a href="Bing Webmaster Guidelines">Bing Webmaster Guidelines</a>.

As described in these documents, Bing's ranking algorithms are designed to identify and prioritize high quality, highly authoritative content available

online that is relevant to the user's query and to prevent abusive search engine optimization techniques (spam).

One of the key ranking techniques Bing uses to prevent low quality or deceptive websites from returning high in search results is through the "quality and credibility" score. Determining the quality and credibility (QC) of a website includes evaluating the clarity of purpose of the site, its usability, and presentation. QC also consists of an evaluation of the page's "authority", which includes factors such as:

- Reputation: What types of other websites link to the site? A well-known news site is considered to have a higher reputation than a brand-new blog.
- Level of discourse: Is the purpose of the content solely to cause harm to individuals or groups of people? For example, a site that promotes violence or resorts to name-calling or bullying will be considered to have a low level of discourse, and therefore lower authority, than a balanced news article.
- Level of distortion: How well does the site differentiate fact from opinion? A site that is clearly labeled as satire or parody will have more authority than one that tries to obscure its intent.
- Origination and transparency of the ownership: Is the site reporting first-hand information, or does it summarize or republish content from others? If the site doesn't publish original content, do they attribute the source? A first-hand account published on a personal blog could have more authority than unsourced content.

In addition to its ranking algorithms, Bing Search's general abuse/spam policies prohibit certain practices intended to manipulate or deceive the Bing Search algorithms, including those that could be employed by malicious actors in the spread of disinformation. Pursuant to the Webmaster Guidelines, Bing may take action on websites employing spam tactics (such as social media schemes, keyword stuffing, malicious behavior, cloaking, link

schemes, or misleading structured data markups) or that otherwise violate the Webmaster Guidelines, including by applying ranking penalties (such as demoting a website) or delisting a website from the index.

Note that it is not feasible to distinguish between general spam tactics and spam tactics employed by malicious actors specifically for the purpose of spreading disinformation. Therefore, Bing Search has not presented data on the amount of spam detected and actioned under its policies since these figures are indicative of actions taken toward spam overall and presently cannot be used to provide an accurate assessment of whether it pertains to spam used in connection with disinformation campaigns or spam used for another purpose (e.g., phishing).

#### Generative AI Features

During the Reporting Period, the nature of Bing generative AI experiences evolved. In October 2024, Microsoft launched a separate, standalone consumer service known as Microsoft Copilot at copilot.microsoft.com, which offers conversational experiences powered by generative AI, and the Copilot in Bing (formerly known as Bing Chat) generative AI experience was phased out. Bing continues to offer generative AI experiences, such as Bing Image Creator and Bing Generative Search, which was launched this Reporting Period. Bing Generative Search utilizes AI to deliver a unique experience by not only optimizing search results but presenting information in a user-friendly, cohesive layout. Results also include citations and links that enable users to explore further and evaluate websites for themselves. For Al-powered experiences, Bing has partnered closely with Microsoft's Responsible AI team to proactively address AI-related risks and continues to evolve these features based on user and external stakeholder feedback. Bing generative AI experiences continue to rely on the same infrastructure and mitigations previously discussed in Microsoft's last report.

Bing Generative Search's primary functionality is, like traditional Bing search, to provide users with links to third party content responsive to their search

queries. As such, the ranking algorithms and spam/abuse policies described above continue to be Bing's primary defense against manipulation and abuse, supplemented by interventions designed specifically to address manipulation in generative AI features. As to answers triggering creative inspiration, Microsoft has worked continuously to improve and adjust safety mitigations, policies, and user experiences within Bing's generative AI experiences to minimize the risk they may be used for manipulative purposes. Additional information on how Microsoft approached responsible AI in Bing's generative AI experiences is available How Bing Delivers Search Results.

TTP 10 remains the most relevant TTP to Bing's generative AI experiences, as users cannot post or share content directly on the Bing service. In addition, Microsoft undertakes specific mitigations to address TTP 7 given the risks that users may attempt to use generative AI to create deepfakes or manipulated media to spread disinformation. Although Bing does not have the ability to monitor third party platforms for publication of content created through Bing's services, Bing has implemented safeguards to help to minimize the risk that bad actors can use Bing generative AI experiences to create mis/disinformation.

Microsoft's <u>Copilot Al Experiences Terms</u> (applicable to <u>Copilot in Bing through October 2024</u>) and <u>Bing's Image Creator Terms of Use</u> (referred to here as "Supplemental Terms") advise users on prohibited conduct and content. These Supplemental Terms primarily address TTPs No. 10 and 7 by restricting attempts to create or spread mis/disinformation or deceptive images using Bing's generative Al experiences. Users that violate the Supplemental Terms and Code of Conduct may be suspended from the service. In addition, Bing's generative Al experiences work to prevent generation of problematic text or images by blocking user prompts that (i) violate the Code of Conduct or (ii) are likely to lead to creation of material that violates the Code of Conduct. Repeated attempts to produce prohibited

#### **QRE 14.1.2**

information to tackle purveyors of disinformation, including disinformation spread by state-sponsored and institutional actors.

LinkedIn maintains an internal Trust and Safety team composed of behaviours (CIBs) are also removed by our Trust and Safety team.

LinkedIn, along with its parent company, Microsoft, is heavily

content or other violations of the Code of Conduct may also result in service or account suspension.

For further information as to how Bing Search and Bing's generative Al experiences implement these policies see QRE 14.1.2.

LinkedIn works with numerous partners to facilitate the flow of As discussed under QRE 14.1.1, TTP No. 10 tends to be the primary mechanism for manipulation and abuse in the context of search engines and is addressed through Bing's ranking systems and abuse policies (for both traditional search and Bing's generative AI experiences).

threat investigators and intelligence analysts to address Blocking content in organic search results based solely on the truth or falsity disinformation. This team works with peers and other stakeholders, of the content can raise significant concerns relating to fundamental rights including our Artificial Intelligence modeling team, to identify and of freedom of expression and the freedom to receive and impart remove nation-state actors and coordinated inauthentic campaigns. information. Instead of blocking access to content to address these TTPs, LinkedIn conducts investigations into election-related influence Bing Search focuses on ranking its organic search results so that trusted, operations and nation-state targeting including continued authoritative news and information appears first and provides tools to help information sharing on threats with industry peers and Law its users evaluate the trustworthiness of certain sites and ensure they are not Enforcement on a regular basis. LinkedIn works with peer companies misled or harmed by the content that appears in search results. Bing and other stakeholders to receive and share indicators related to fake presumes the user seeks high quality, authoritative content unless the user accounts created by state-sponsored actors, such as confirmed clearly indicates an intent to research low quality content. Bing Search takes Tactics, Techniques, and Protocols (TTPs) and Indicators of actions to promote high authority, high quality content and thereby reduce Compromise (IOC). This exchange of information leads to a better the impact of misinformation appearing in Bing Search results. This includes understanding of the incentives of sophisticated and well-funded Bing Search's continued improvement of its ranking algorithms to ensure threat actors and how they evolve their TTPs to achieve those goals, that authoritative, relevant content is returned at the top of search results, which assists LinkedIn in their identification and removal. Any regular review and actioning of disinformation threat intelligence, associated disinformation content is verified by our internal or partnership with third party information intelligence and media literacy external fact-checkers as needed, and coordinated inauthentic organizations, contributing to and supporting the research community, and enforcement of clear policies concerning the use of manipulative tactics on Bing Search, among other initiatives described elsewhere in this report.

involved in threat exchanges. These threat exchanges take various Although the Bing Search algorithm endeavors to prioritize relevance, forms, such as: 1) regular discussion amongst industry peers to quality, and credibility, in some cases Bing Search identifies threats arising discuss high-level trends and campaigns; and, 2) one-on-one from emerging or evolving world events and/or activities by external actors their identification and removal.

The LinkedIn Community Report also describes actions we take on authority search results. content that violates our Professional Community Policies and User the most recent report <u>published</u> in February 2025.

engagement with individual peer companies to discuss TTPs and that attempt to undermine the efficacy of its algorithms. When this happens, IOCs. This exchange of information leads to a better understanding Bing Search employs "defensive search" strategies and interventions to of the incentives of sophisticated and well-funded threat actors and counteract threats and TTPs in accordance with its trustworthy search how they evolve their TTPs to achieve those goals, which assists us in principles (which are discussed in further detail in the How Bing Delivers Search Results.

LinkedIn always stands ready to receive and investigate any leads we | "Defensive search interventions" may include algorithmic interventions (such receive from peers and other external stakeholders. In addition to as authority signal boost in ranking or demotions of a website), restricting one-on-one engagement with peers, we also consume intelligence autosuggest or related search terms to avoid directing users to problematic from vendors and investigate any TTPs and IOCs made available in queries, prioritizing additional features promoting high authority peer disclosures. In turn, we also regularly release information about information (e.g., Answers or Public Service Announcements), and in limited policy-violating content on our platform in publicly available cases manual interventions for individual reported issues or broader areas transparency reports and blog posts, including for example How more prone to misinformation or disinformation. Bing actively monitors We're Protecting Members From Fake Profiles, Automated Fake manipulation trends in identified high-risk areas and deploys mitigation Account Detection, and An Update on How We Keep Members Safe. methods as needed to ensure users are provided with high quality, high

Agreement. It is published twice per year and covers the global In addition to defensive search, Bing Search regularly monitors for other detection of fake accounts, spam and scams, content violations and violations of its Webmaster Guidelines, including attempts to manipulate the copyright infringements. The most recent reporting period covered 1 Bing Search algorithm through prohibited practices such as cloaking, link January to 30 June 2024. LinkedIn Ireland Unlimited Company – the spamming, keyword stuffing, and phishing. Bing Search dedicates provider of LinkedIn's services in the EU – has been designated by the meaningful resources to maintaining the integrity of the platform, European Commission as a very large online platform and, therefore, promoting high authority, relevant results, and reducing spam (including pursuant to its obligations under Article 42 of the Digital Services Act, spam aimed at distributing low authority information and manipulative publishes Transparency Reports covering the EU every 6 months, with content). Bing Search utilizes a combination of human intervention and Aldriven analysis to regularly review, detect, and address spam tactics occurring on Bing Search. When Bing Search detects websites deploying manipulative techniques or engaging in spam tactics, those websites may incur ranking penalties or be removed from the Bing Search index altogether.

Microsoft also works to identify and track nation-state information operations targeting democracies across the world and works with a number of trusted third-party partners for early indicators of narratives, hashtags, or information operations that can be leveraged to inform early detection and defensive search strategies. Through Microsoft's Democracy Forward team and the Microsoft Threat Assessment Center (MTAC), Microsoft also offers mediums for election authorities, including in the EU and EEA Member States, to have lines of communication with Microsoft to identify possible foreign information operations targeting elections.

The above measures also apply to Bing's generative AI experiences. responses to user prompts are "grounded" on high authority content from the web (except in certain creative use cases), which are based on the same ranking algorithms and moderation infrastructure that are used by Bing's traditional web search, and, as such, benefit from Bing's longstanding safety infrastructure described above. Nonetheless, Microsoft recognizes that generative AI technology may also raise novel risks and possibilities of harm that are not present in traditional web search and has supplemented its existing threat identification and mitigation processes with additional risk assessments and mitigation processes based on Microsoft's Responsible AI program.

Microsoft's Responsible AI program is designed to identify potential harms, measure their propensity to occur, and build mitigations to address them. Guided by its Responsible AI Standard, Microsoft identifies, measures, and mitigates potential harms and misuse of new generative AI experiences while securing the transformative and beneficial uses that these tools provide. , Microsoft has implemented a range of safety mitigations to help address, among other things, impermissible content, behaviours, and other TTPs that could potentially be used to create or spread misinformation.

Below are several examples of Microsoft's iterative approach to identify, measure, and mitigate potential harms, including the spread of misinformation.

- **Pre-launch and ongoing testing.** Before launching Bing's generative AI experiences, Microsoft conducted "red team" testing. A multidisciplinary team of experts evaluated how well the system responded when pressed to produce harmful responses, surface potential avenues for misuse, and identify capabilities and limitations. Post-release, generative AI experiences are integrated into Microsoft engineering organizations' existing production measurement and testing infrastructure. More information on Microsoft's approach to red-team testing is available at Microsoft AI Red Team building future of safer AI | Microsoft Security Blog.
- Classifiers, Metaprompting, and Filtering Interventions: Microsoft has created special mitigations in the form of "classifiers" and "metaprompting" to help reduce the risk of certain harms and misuse of generative AI features. Classifiers classify text to flag different types of potentially harmful content in search gueries, chat prompts, or generated responses. Microsoft uses Albased classifiers and content filters, which apply to all search results and relevant features; it also designed additional prompt classifiers and content filters specifically to address possible harms raised by new generative AI features.. Flags lead to potential mitigations, such as not returning generated content to the user, diverting the user to a different topic, or redirecting the user to traditional search. Metaprompting involves giving instructions to the model to guide its behavior, including so that the system behaves in accordance with Microsoft's Al Principles and user expectations. Microsoft has also implemented additional filtering and classifiers to prevent chat responses from returning what Bing considers "low authority" content as part of an answer and to help address impermissible content, behaviours, and other TTPs (e.g., TTP No. 7) that could potentially be used to create or spread misinformation.

- Content Provenance Tools. Microsoft also makes it clear that images created in Bing Image Creator (and Copilot in Bing prior to its phase out) are Al-generated by including content provenance information in each image. These content provenance features use cryptographic methods to mark and sign Al-generated content with metadata about its source and history. The invisible digital watermark feature shows the source, time, and date of original creation, and this information cannot be altered. Providing clear indications of image provenance helps reduce the risk of deepfakes (e.g., TTP No. 7) and helps users identify when an image was generated with the assistance of Microsoft generative Al tools. Microsoft has partnered with other industry leaders to create the Coalition for Content Provenance and Authenticity (C2PA) standards body to help develop and apply content provenance standards across the industry.
- **Expanded and Prominent Reporting Functionality.** Bing's generative Al experiences allow users to submit feedback and report their concerns, which are then reviewed by Microsoft's operations teams. Microsoft has made it easy for users to report problematic content they encounter while using generative Al features in Bing by including a "Feedback" portal on the footer of every Bing page, with direct links to its "Report a Concern" tool.
- Regular Improvements Based on Real World Usage. Microsoft continues to make changes to Bing generative AI experiences regularly to improve product performance, update existing mitigations, and implement new mitigations in response to our learnings based on real-world usage of the product.
- **Operations and incident response.** Bing also uses Microsoft's ongoing monitoring and operational processes to address when Bing's generative AI features receive signals or a report indicating possible misuse or violations of the terms of use.

		- Cooperation with Industry Partners. The third-party content that grounds Bing's generative AI experiences relies on the same ranking algorithms and defensive interventions that power traditional Bing search, including reliance on signals of page authority that Bing receives from its third-party partners and fact-checks using the ClaimReview protocol.  Our approach to identifying, measuring, and mitigating harms will continue to evolve as we learn more, and we continue to make improvements based on feedback from users, civil society groups, and other third-party stakeholders.  Microsoft also maintains a web page – Microsoft-2024 Elections – where political candidates and election authorities can report alleged deepfakes of themselves or the election process on Microsoft platforms to Microsoft.  See also response to QRE 14.1.1.
Measure 14.2	LinkedIn	Bing Search
QRE 14.2.1	and misinformation is removed from the LinkedIn platform. Where LinkedIn removes such content pursuant to our false and misleading content policies, LinkedIn notifies members of the action taken.	The Webmaster Guidelines – and related defensive search and spam interventions – are global policies that are enforced globally by Bing Search, including in EU Member States. Websites that appear in Bing search results (in traditional search or in generative AI chat) are not hosted by Bing Search and, as such, Bing Search has limited information about the hosting location of these third-party websites. When addressing spam activity, Bing Search takes action at the global level (which necessarily carry through to Copilot AI features reliant on the Bing search index) to benefit Bing Search users in all countries (including EU Member States). Bing Search's defensive search interventions are also applied at a global level (thereby encompassing all EU member states) and automatically applied to queries searched in all EU languages. Metrics on defensive search interventions are provided in SLI 14.2.1.

To ensure their content reaches a large audience, bad actors need to either connect with real members or post content that real members will like—both of which are hard to achieve on LinkedIn given our professional focus. The mass dissemination of false information, as well as artificial traffic and engagement, therefore, requires the mass creation of fake accounts, which we have various defences to prevent and limit.

To evolve to the ever-changing threat landscape, our team continually invests in new technologies for combating inauthentic behaviour on the platform. We are investing in artificial intelligence technologies such as advanced network algorithms that detect communities of fake accounts through similarities in their content and behaviour, computer vision and natural language processing algorithms for detecting Al-generated elements in fake profiles, anomaly detection of risky behaviours, and deep learning models for detecting sequences of activity that are associated with abusive automation. As noted in our most recent global Transparency Report, in the period 1 January to 30 June 2024, LinkedIn blocked or removed approximately 86 million fake accounts. Our automated defenses blocked 94.6% of the fake accounts we stopped during that period, with the remaining 5.4% stopped by our manual investigations and restrictions. 99.7% of the fake accounts were stopped proactively, before a member report.

To respond to the ever-changing threat landscape, LinkedIn's teams continually invest in new technologies for combating inauthentic behavior on the platform. LinkedIn committed to the Tech Accord to Combat Deceptive Use of AI in 2024 Elections. Aligned with this commitment, LinkedIn is investing in AI technologies such as advanced network algorithms that detect communities of fake

See also responses to QRE 14.1.1-2.

accounts through similarities in their content and behavior; computer vision and natural language processing algorithms for detecting Algenerated elements in fake Profiles such as deep fakes; anomaly detection of risky behaviors; and deep learning models for detecting sequences of activity that are associated with abusive automation. LinkedIn has also adopted the Coalition for Content Provenance and Authenticity's industry-leading "Content Credentials" technology (C2PA) to include metadata labeling, including data about whether content is created using Al, on content containing the C2PA technology. Furthermore, LinkedIn acts vigilantly to maintain the integrity of all accounts and to ward off false account activity:

- Establishing metrics for when election-related conversations, violations, or operational capacity breach a threshold and require additional support
- Maintaining a dedicated Anti-Abuse team to research emerging trends and key risks and develop tools to address them
- Using AI to detect inauthentic activity and communities of fake accounts
- Using automated systems to detect and block automated activity
- Imposing limits on certain categories of activity commonly engaged in by bad actors
- Conducting manual investigation and restriction of accounts engaged in automated activity
- Using third party fact checkers during the human content review process
- Conducting hash matching for known instances of deepfake content
- Maintaining 24/7 escalation paths to address any emerging issues

LinkedIn has reported available metrics at SLI 14.2.1 in respect of the following TTPs:

- TTP 1: Creation of inauthentic accounts or botnets (which may include automated, partially automated, or nonautomated accounts)
- TTP 2: Use of fake / inauthentic reactions (e.g. likes, up votes, comments)
- TTP 3: Use of fake followers or subscribers
- TTP 4: Creation of inauthentic pages, groups, chat groups, fora, or domains

LinkedIn has also reported metrics for SLI 14.2.2 in respect of TTP 1 and TTP 4.

LinkedIn has focused its efforts on TTPs 1-4 because, as a realidentity professional network, the harm on LinkedIn is generally conducted through fake accounts. Our real members know that the content they post is viewed by their colleagues, managers, and potential business partners, and therefore they generally do not knowingly post misinformation.

With respect to the remaining TTPs, LinkedIn is unable to reasonably ascertain the intent or provenance of such content. As discussed above, disinformation is not prevalent on LinkedIn due to the professional context of the platform. Distribution of such content through fake accounts is further hampered due to the need to create connections between the fake account and the real member. In the rare instances that such misinformation is spread through fake accounts, due to the adversarial nature of this activity, publicly disclosing details regarding the threat actor's TTPs would hurt our ability to fight against this activity. For example, reporting that

vulnerable recipients were not targeted may incentivize the targeting of such recipients.	,
LinkedIn has and will continue to evaluate what additional metrics it could potentially include in future reporting in light of how LinkedIn's services function and are used.	

			LinkedIn				
			SLI 14.2.1 – SLI 14.2.4				
TTP 1	accounts)." SLI 14.2.1 rep out by EEA Member Stat	The table below addresses TTP 1: "Creation of inauthentic accounts or botnets (which may include automated, partially automated, or non-automated accounts)." SLI 14.2.1 reports the number of fake accounts that LinkedIn prevented from being created or restricted between 1 July - 31 December 2024, broken out by EEA Member State. The fake accounts reported are attributed to EEA Member States based on the IP address used during registration of the account. 'Number of instances of identified TTPs' and 'Number of actions taken by type' are identical given LinkedIn blocked the registration attempt or restricted the account in all instances.					
	2024. For example, the 19 2024. Whether an accour in in SLI 14.2.1 that poste	SLI 14.2.2. reports two metrics. First, the number of EEA accounts that connected to or followed the fake accounts in SLI 14.2.1 between 1 July – 31 December 2024. For example, the 194,153 fake accounts reported for Austria had a total of 3,299 EEA accounts connect to or follow them between 1 July and 31 December 2024. Whether an account qualifies as an EEA account is based on the IP address used during registration of the account. Second, the number of fake accounts in in SLI 14.2.1 that posted a feed post between 1 July – 31 December 2024. For example, of the 444,743 fake accounts prevented or restricted for Ireland, 789 posted a feed post between 1 July and 31 December 2024.					
	Please note that the medisinformation.	Please note that the metrics provided below are total numbers and do not imply that these fake accounts were engaging in posting misinformation or disinformation.					
	We have not reported metrics associated with this TTP where, for example, there is no meaningful metric to report (e.g., metrics for after the TTP in question, given LinkedIn removes detected misinformation and fake accounts from our platform) or LinkedIn does not have a reasonable means to compute the requested metrics.						
	SLI 14.2.1	SLI 14.2.2	SLI 14.2.3	SLI 14.2.4			

	Nr of instances of	fNr of actions taken	Views/ impressions	Views/ impressions	Penetration	Trends on	Trends on	TTPs	Views/	Interaction
	identified TTPs	by type	before action	before action	and impact	targeted	narratives	related	impressio	/
					on genuine	audiences	used	content	ns of TTP	engageme
	The number of	The number of fake	The number of EEA	The number of fake	users			in relation	related	nt with TTP
	fake accounts	accounts LinkedIn	accounts that	accounts that posted				to overall	content	related
	LinkedIn	prevented or	connected to or	a feed post between				content on	`	content (in
	prevented or	restricted between	followed the fake	1 July – 31				the	relation	relation to
	restricted	1 July – 31	accounts between	December 2024				service		overall
	between	December 2024	1 July – 31 December						views/	interaction
	1 July – 31		2024						impressio	
	December 2024									engageme
	2024								service)	nt on the
										service)
										Service)
Member States										
Austria	194,153	194,153	3,299	710						
Belgium	344,346	344,346	5,081	1,147						
Bulgaria	140,495	140,495	2,033	549						
Croatia	53,395	53,395	1,465	236						
Cyprus	61,105	61,105	977	218						
Czech Republic	185,280	185,280	3,811	629						
Denmark	150,598	150,598	2,732	558						
Estonia	452,316	452,316	525	129						
Finland	530,752	530,752	1,701	506						
France	2,712,034	2,712,034	58,419	11,784						
Germany	1,923,995	1,923,995	35,323	9,523						
Greece	271,628	271,628	5,422	1,009						
Hungary	102,782	102,782	1,606	401						
Ireland	444,743	444,743	3,951	789						

Norway	104,916	104,916	1,797	413			
Liechtenstein	1,080	1,080	24	6			
Iceland	16,166	16,166	191	36			
Sweden	518,628	518,628	6,511	1,020			
Spain	2,046,114	2,046,114	68,945	6,128			
Slovenia	80,358	80,358	654	142			
Slovakia	84,337	4,337	1,207	266			
Romania	683,248	683,248	5,942	920			
Portugal	180,022	180,022	6,676	1,448			
Poland	597,637	597,637	13,476	2,715			
Netherlands	1,172,414	1,172,414	18,922	3,448			
Malta	31,539	31,539	587	101			
Luxembourg	40,195	40,195	655	134			
Lithuania	155,975	155,975	1,927	304			
Latvia	468,370	468,370	1,087	230			
Italy	8,365,534	8,365,534	21,848	4,535			

# The table below addresses TTP 2: "Use of fake / inauthentic reactions (e.g. likes, up votes, comments)." The table reports the number of fake accounts reported in TTP 1 SLI 14.2.1 that reacted to, commented on, or shared (collectively, "engaged with") a feed post between 1 July – 31 December 2024.

The numbers of fake accounts reported below are a subset of the fake accounts reported in TTP 1 SLI 14.2.1 that engaged with a feed post between 1 July – 31 December 2024. For example, of the 194,153 fake accounts that LinkedIn prevented from being created or restricted between 1 July – 31 December 2024 in Austria (as reported in TTP 1 SLI 14.2.1), 1,148 of those accounts engaged with a feed post between 1July – 31 December 2024.

Please note that the metrics provided below are total numbers and do not imply that these fake accounts were engaging in posting misinformation or disinformation.

We have not reported metrics associated with this TTP where, for example, there is no meaningful metric to report (e.g., metrics for after the TTP in question, given LinkedIn removes detected misinformation and fake accounts from our platform) or LinkedIn does not have a reasonable means to compute the requested metrics. SLI 14.2.1 SLI 14.2.2 SLI 14.2.3 SLI 14.2.4 Penetration Trends on Nr of Nr of Views/ Trends on TTPs Views/ Views/ Interaction Interaction/ Interaction impressions/ instances of impressions engagement and impact targeted narratives related impressions of actions engagement after content in TTP related identified taken by before after action audiences engagement with on used TTPs before action content (in TTP related type action genuine relation content (in action users relation to overall to overall views/impressions relation to overall The number content interaction of fake on the on the service) service /engagement on accounts the service) reported in TTP 1 SLI 14.2.1 that engaged with a feed post between 1 July – 31 December 2024 Member States Austria 1,148 Belgium 1,399 Bulgaria 791 Croatia 373 Cyprus 312 Czech Republic 740 Denmark 648 Estonia 166

Total EEA	67,545						
Total EU	66,909						
Norway	583						
Liechtenstein	4						
Iceland	49						
Sweden	1,378						
Spain	6,420						
Slovenia	166						
Slovakia	309						
Romania	1,328						
Portugal	1.660						
Poland	4,104						
Netherlands	4,451						
Malta	122						
Luxembourg	261						
Lithuania	678						
Latvia	312						
Italy	6,200						
Ireland	1,064						
Hungary	475						
Greece	1,230						
Germany	15,410						
France	14,984						
Finland	744						

TTP 3	The table below addresses TTP 3: "Use of fake followers or subscribers." The table reports the number of fake accounts reported in TTP 1 SLI 14.2.1 that followed
	a LinkedIn profile or page between 1 July – 31 December 2024.

The numbers of fake accounts reported below are a subset of the fake accounts reported in TTP 1 SLI 14.2.1 that followed a LinkedIn profile or page between 1 July – 31 December 2024. For example, of the 194,153 fake accounts that LinkedIn prevented from being created or restricted between 1 July – 31 December 2024 in Austria (as reported in TTP 1 SLI 14.2.1), 9,198 of those accounts followed a LinkedIn profile or page between 1 July – 31 December 2024 (as reported below).

Please note that the metrics provided below are total numbers and do not imply that these fake accounts were engaging in posting misinformation or disinformation.

We have not reported metrics associated with this TTP where, for example, there is no meaningful metric to report (e.g., metrics for after the TTP in question, given LinkedIn removes detected misinformation and fake accounts from our platform) or LinkedIn does not have a reasonable means to compute the requested metrics.

Nr of Nr of Views/ Interaction Views/ Interaction Penetration Trends on Trends on instances of actions impression / identified taken by s before engagement ns after engagement on audiences used relation Trends on Tre	TPs related Views/ Interaction ontent in impressions of elation to TTP related engagement verall content (in with TTP ontent on relation to overall related
instances of identified taken by s before engagement type action before action  The number of fake accounts reported in TTP 1 SLI 14.2.1 that followed a LinkedIn	ontent in impressions of / elation to TTP related engagement verall content (in with TTP ontent on relation to overall related
identified taken by s before engagement type action before action after genuine action users  The number of fake accounts reported in TTP 1 SLI 14.2.1 that followed a LinkedIn	elation to TTP related engagement verall content (in with TTP ontent on relation to overall related
TTPs type action before action after genuine overs  The number of fake accounts reported in TTP 1 SLI 14.2.1 that followed a LinkedIn	verall content (in with TTP ontent on relation to overall related
The number of fake accounts reported in TTP 1 SLI 14.2.1 that followed a LinkedIn	ontent on relation to overall related
The number of fake accounts reported in TTP 1 SLI 14.2.1 that followed a LinkedIn	
of fake accounts reported in TTP 1 SLI 14.2.1 that followed a LinkedIn	vious (impressions sentent (in
accounts reported in TTP 1 SLI 14.2.1 that followed a LinkedIn	ne views/impressions content (in
reported in TTP 1 SLI 14.2.1 that followed a LinkedIn	ervice on the service) relation to
TTP 1 SLI 14.2.1 that followed a LinkedIn	overall
14.2.1 that followed a LinkedIn	interaction
followed a LinkedIn	/engagemer
LinkedIn	on the
	service)
profile or	
page	
between 1	
July – 31	
December December	
2024	
Member States	

Austria	9,198						
Belgium	10,504						
Bulgaria	5,564						
Croatia	3,539						
Cyprus	1,631						
Czech Republic	11,763						
Denmark	6,065						
Estonia	2,523						
Finland	5,352						
France	137,403						
Germany	142,964						
Greece	11,514						
Hungary	4,856						
Ireland	11,910						
Italy	84,608						
Latvia	2,667						
Lithuania	4,464						
Luxembourg	1,567						
Malta	851						
Netherlands	39,036						
Poland	55,905						
Portugal	12,295						
Romania	10,745						
Slovakia	3,110						
Slovenia	1,298						
Spain	65,638						
Sweden	11,253						
Iceland	390						

Liechtenstein	52						
Norway	3,859						
Total EU	658,223						
Total EEA	662,524						

### TTP 4

The table below addresses TTP 4: "Creation of inauthentic pages, groups, chat groups, I, or domains." SLI 14.2.1 reports the number of LinkedIn pages or groups that the fake accounts reported in TTP 1 SLI 14.2.1 created between 1 July – 31 December 2024.

The numbers of LinkedIn pages or groups created reported below are based on the population of fake accounts reported in TTP 1 SLI 14.2.1. For example, the 194,153 fake accounts that LinkedIn prevented from being created or restricted between 1 July – 31 December 2024 in Austria (as reported in TTP 1 SLI 14.2.1) created 33 LinkedIn pages or groups between 1 July – 31 December 2024 (as reported below).

SLI 14.2.2 reports the number of accounts in the EEA that joined or followed the pages or groups reported in TTP 4 SLI 14.2.1 between 1 July – 31 December 2024. For example, the 33 pages and groups reported for Austria in TTP4 SLI 14.2.1 had a total of 107 EEA accounts join or follow between 1 July – 31 December 2024. Whether an account qualifies as an EEA account is based on the IP address used during registration of the account.

Please note that the metrics provided below are total numbers and do not imply that these fake accounts were engaging in posting misinformation or disinformation.

We have not reported metrics associated with this TTP where, for example, there is no meaningful metric to report (e.g., metrics for after the TTP in question, given LinkedIn removes detected misinformation and fake accounts from our platform) or LinkedIn does not have a reasonable means to compute the requested metrics.

SLI 14.2.1		SLI 14.2.2	2.2			SLI 14.2.3			SLI 14.2.4			
Nr of	Nr of	Views/	Interaction/	Views/	Interaction/	Penetration	Trends on	Trends	TTPs	Views/	Interactio	'n
instances of	actions	impressions	engagement	impressions	engagement	and impact	targeted	on	related	impressions of	/	
identified	taken by	before action	before	after	after action	on	audiences	narratives	content	TTP related	engagem	ent
TTPs	type		action	action		genuine		used	in	content (in	with	TTP
		The number of				users			relation	relation to overall	related	
The number		accounts in the							to	views/impressions	content	(in
of LinkedIn		EEA that joined							overall	on the service)	relation	to

	pages or	or followed the				content	overall
	groups	pages and				on the	interaction
	created	groups reported				service	/engagement
	between 1	in TTP 4 SLI					on the
	July – 31	14.2.1 between 1					service)
	December	July – 31					
	2024 by the	December 2024					
	fake						
	accounts						
	reported in						
	TTP 1 SLI						
	14.2.1.						
Member States							
Austria	33	107					
Belgium	35	177					
Bulgaria	18	31					
Croatia	12	78					
Cyprus	16	23					
Czech Republic	50	50					
Denmark	8	42					
Estonia	7	14					
Finland	10	35					
France	321	2,484					
Germany	195	792					
Greece	21	211					
Hungary	12	114					
Ireland	26	47		 			
Italy	141	2,225					
Latvia	13	35					

Lithuania	10	50					
Luxembourg	3	21					
Malta	6	35					
Netherlands	94	420					
Poland	104	349					
Portugal	79	884					
Romania	38	161					
Slovakia	20	33					
Slovenia	6	18					
Spain	191	1,499					
Sweden	28	147					
Iceland	0	5					
Liechtenstein	0	2					
Norway	9	24					
Total EU	1,497	10,082	_	_	_		
Total EEA	1,506	10,113					

TTP 5	LinkedIn notes that per the Integrity of Services Sub-Group, SLI 14.2.1 is theoretically fit for purpose, SLI 14.2.2 is not fit for purpose, SLI 14.2.3 is Optional/
	Alternative and SLI 14.2.4 is Partially fit for purpose. However, LinkedIn has not reported metrics associated with this TTP 5 (Account hijacking or impersonation)
	for the reasons explained in our response to QRE 14.2.1.

TTP 6	LinkedIn notes that per the Integrity of Services Sub-Group, SLI 14.2.1 is theoretically fit for purpose, SLI 14.2.2 is not fit for purpose, SLI 14.2.3 is Optional/
	Alternative and SLI 14.2.4 is Partially fit for purpose. However, LinkedIn has not reported metrics associated with this TTP 6 (Deliberately targeting vulnerable
	recipients (e.g. via personalized advertising, location spoofing or obfuscation)) for the reasons explained in our response to QRE 14.2.1.

TTP 7	LinkedIn notes that per the Integrity of Services Sub-Group, SLI 14.2.1, SLI 14.2.2 and SLI 14.2.4 are theoretically fit for purpose and SLI 14.2.3 is Optional/
	Alternative. However, LinkedIn has not reported metrics associated with this TTP 7 (Deploy deceptive manipulated media ("deep fakes", "cheap fakes")) for
	the reasons explained in our response to QRE 14.2.1.

- LinkedIn notes that per the Integrity of Services Sub-Group, SLI 14.2.1 is theoretically fit for purpose, SLI 14.2.2 is Not fit for purpose, SLI 14.2.3 is Optional/Alternative and SLI 14.2.4 is Partially fit for purpose. However, LinkedIn has not reported metrics associated with this TTP 8 (Use "hack and leak" operation (which may or may not include doctored content)) for the reasons explained in our response to QRE 14.2.1
- LinkedIn notes that per the Integrity of Services Sub-Group, SLI 14.2.1 is theoretically fit for purpose, SLI 14.2.2 is not fit for purpose, SLI 14.2.3 is Optional/ Alternative and SLI 14.2.4 is Partially fit for purpose. However, LinkedIn has not reported metrics associated with this TTP 9 (Inauthentic coordination of content creation or amplification, including attempts to deceive/manipulate platforms algorithms (e.g. keyword stuffing or inauthentic posting/reposting designed to mislead people about popularity of content, including by influencers)) for the reasons explained in our response to QRE 14.2.1.
- LinkedIn notes that per the Integrity of Services Sub-Group, SLI 14.2.1 is theoretically fit for purpose, SLI 14.2.2 is not fit for purpose, SLI 14.2.3 is Optional/ Alternative and SLI 14.2.4 is Partially fit for purpose. However, LinkedIn has not reported metrics associated with this TTP 10 (Use of deceptive practices to deceive/manipulate platforms algorithms, such as to create, amplify or hijack hashtags, data voids, filter bubbles, or echo chambers) for the reasons explained in our response to QRE 14.2.1.
- LinkedIn notes that per the Integrity of Services Sub-Group, SLI 14.2.1, SLI 14.2.2 and SLI 14.2.4 are Theoretically fit for purpose, and SLI 14.2.3 is Optional/
  Alternative. However, LinkedIn has not reported metrics associated with this TTP 11 (Non-transparent compensated messages or promotions by influencers)
  for the reasons explained in our response to QRE 14.2.1. LinkedIn also notes that where members share content in an exchange for value (including monetary
  payment, endorsements, free products or services, or other benefit), they must label the post as a brand partnership and comply with our Advertising Policies
  and applicable local laws. This Help Center article provides details on how to label a post as a brand partnership.
- LinkedIn notes that per the Integrity of Services Sub-Group, SLI 14.2.1 is Theoretically fit for purpose, SLI 14.2.2 is not fit for purpose, SLI 14.2.3 is Optional/ Alternative and SLI 14.2.4 is Partially fit for purpose. However, LinkedIn has not reported metrics associated with this TTP 12 (Coordinated mass reporting of non-violative opposing content or accounts) for the reasons explained in our response to QRE 14.2.1.

	Bing S	earch									
	SLI 14.2.1 – SLI 14.2.4										
TTP 10	voids, filter bubbles, or echo chambers"), which is the TTP primarily appears to this SLI, Bing Search is providing data on platform. This response includes the following data categories:  • "New DSI" reflects the net new number of queries treated we the preceding reporting period. Although Member State reporting period. Although Member State reporting for globally actioned measures. See • "AutoSuggest DSI" reflects the number of search query straditional web search and Copilot in Bing) during the Reporting appears oriented to social or sharing platforms. Bing also cannot provide query-driven nature of web search. Nonetheless, below Bing Search interventions across all of Bing Search during the Reporting Period.  • "Unique Queries DSI" reflects the total number of unique querying the Reporting Period.  • "DSI Query Impressions" reflects the number of impression in the EEA during the Reporting Period.  SLI 14.2.3 – This SLI is not applicable to search engines, as Bing Search generated content with other users. User accounts in the manner con are not capable of amplifying creating or amplifying content as one in	suggestions that were suppressed for queries entered by users in the EEA (including riting Period.  Is Bing does not allow users to "like" or "share" content within Bing and this SLI metric vide "before and after" data due to the preventative nature of search interventions and has provided user impressions for queries that were treated with "defensive search" deries searched by users in the EEA that were treated with defensive search interventions is for unique queries treated with defensive search interventions that appeared to users in its not an online platform that allows for user hosted content or public sharing of user templated under this provision are not available in search (i.e. registered user accounts hay through a social media network).									
	For SLI 14.2.4 – This SLI is also not applicable to search engines for the										
	SLI 14.2.1	l 14.2.2									

	Nr of actions taken by type	Nr of actions taken by type			Interaction/ engagement before action
	New DSI	Autosuggest DSI	Unique Queries DSI	DSI Query Impressions	N/A
Member States			-		
Austria		1,163,867	16,147	239,285	
Belgium		1,997,745	23,562	362,660	
Bulgaria		1,475	34	60	
Croatia		335	13	19	
Cyprus		203	11	14	
Czech Republic		3,658	64	110	
Denmark		672,541	1,114	138,488	
Estonia		231	17	20	
Finland		498,591	8,610	235,038	
France		8,892,324	59,006	2,396,725	
Germany		12,369,375	82,990	2,972,910	
Greece		1,158	17	25	
Hungary		3,249	31	52	
Ireland		506,151	26,277	246,692	
Italy		4,268,446	30,466	828,014	
Latvia		484	28	46	
Lithuania		397	18	24	
Luxembourg		90	3	10	
Malta		119	13	13	
Netherlands		3,242,718	35,638	498,064	
Poland		2,606,075	28,271	684,654	
Portugal		739,093	19,505	263,932	
Romania		2,755	63	143	
Slovakia		874	27	29	
Slovenia		228	6	7	

Spain		3,732,912	33,959	1,094,565	
Sweden		1,508,028	27,583	377,152	
Iceland		28	24	38	
Liechtenstein		0	1	1	
Norway		1,473,136	18,699	202,148	
Total EU		42,213,122	220,880	10,540,938	
Total EEA		43,686,286	239,604	10,743,125	
Total Global	11.4 million	-	-	-	

Measure 14.3	LinkedIn	Bing Search
QRE 14.3.1	The relevant Taskforce Subgroup has considered the list of TTPs adopted in the second half of 2022 (and reported on in Microsoft's previous reports) as being fit for purpose for the current reporting cycle. LinkedIn reiterates the need for flexibility amongst different types of services to address TTPs that	The relevant Taskforce Subgroup has considered the list of TTPs adopted in the second half of 2022 (and reported on in Microsoft's previous reports) as being fit for purpose for the current reporting cycle. The list can be consulted below.
	are most relevant to their platforms.  This list can be consulted below:	However, as noted in QRE 14.1.1 and 14.1.2, many of these TTPs are inapplicable to or irrelevant to search engines. Bing reiterates the need for flexibility amongst different types of services signatories to address TTPs that are most relevant to
	<ul> <li>The following TTPs pertain to the creation of assets for the purpose of a disinformation campaign, and to ways to make these assets seem credible:</li> <li>1. Creation of inauthentic accounts or botnets (which may include automated, partially automated, or non-automated accounts)</li> <li>2. Use of fake / inauthentic reactions (e.g. likes, up votes, comments)</li> <li>3. Use of fake followers or subscribers</li> <li>4. Creation of inauthentic pages, groups, chat groups, fora, or domains</li> </ul>	<ul> <li>The following TTPs pertain to the creation of assets for the purpose of a disinformation campaign, and to ways to make these assets seem credible:         <ul> <li>1. Creation of inauthentic accounts or botnets (which may include automated, partially automated, or non-automated accounts)</li> <li>2. Use of fake / inauthentic reactions (e.g. likes, up votes, comments)</li> <li>3. Use of fake followers or subscribers</li> </ul> </li> </ul>
	5. Account hijacking or impersonation  The following TTPs pertain to the dissemination of content created in the context of a disinformation campaign, which may or may not include some	<ul> <li>4. Creation of inauthentic pages, groups, chat groups, fora, or domains</li> <li>5. Account hijacking or impersonation</li> </ul> The following TTPs pertain to the dissemination of content created in the context of a disinformation campaign, which may or may not include some

include:

- 6. Deliberately targeting vulnerable recipients (e.g. via personalized advertising, location spoofing or obfuscation)
- 7. Deploy deceptive manipulated media (e.g. "deep fakes", "cheap fakes"...)
- 8. Use "hack and leak" operation (which may or may not include doctored content)
- 9. Inauthentic coordination of content creation or amplification, including attempts to deceive/manipulate platforms algorithms (e.g. keyword stuffing or inauthentic posting/reposting designed to mislead people about popularity of content, including by influencers)
- 10. Use of deceptive practices to deceive/manipulate platform algorithms, such as to create, amplify or hijack hashtags, data voids, filter bubbles, or echo chambers
- 11. Non-transparent compensated messages or promotions by influences
- 12. Coordinated mass reporting of non-violative opposing content or accounts

Further, as noted above, the relevant Taskforce Subgroup has considered whether the SLIs for each of these TTPs are fit for purpose and classified each SLI as either Theoretically fit for purpose, Not fit for purpose, Partially fit for purpose or Optional /Alternative.

forms of targeting or attempting to silence opposing views. Relevant TTPs forms of targeting or attempting to silence opposing views. Relevant TTPs include:

- 6. Deliberately targeting vulnerable recipients (e.g. via personalized advertising, location spoofing or obfuscation)
- 7. Deploy deceptive manipulated media (e.g. "deep fakes", "cheap fakes"...)
- 8. Use "hack and leak" operation (which may or may not include doctored content)
- 9. Inauthentic coordination of content creation or amplification, including attempts to deceive/manipulate platforms algorithms (e.g. keyword stuffing or inauthentic posting/reposting designed to mislead people about popularity of content, including by influencers)
- 10. Use of deceptive practices to deceive/manipulate platform algorithms, such as to create, amplify or hijack hashtags, data voids, filter bubbles, or echo chambers
- 11. Non-transparent compensated messages or promotions by influencers
- 12. Coordinated mass reporting of non-violative opposing content or accounts

# **IV. Integrity of Services**

## Commitment 15

Relevant Signatories that develop or operate AI systems and that disseminate AI-generated and manipulated content through their services (e.g. deep fakes) commit to take into consideration the transparency obligations and the list of manipulative practices prohibited under the proposal for Artificial Intelligence Act.

	C.15	M 15.1	M 15.2
We signed up to the following	LinkedIn	LinkedIn	LinkedIn
measures of this commitment:	Bing Search	Bing Search	Bing Search

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g.	Yes	No
changes to your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Additional transparency on use of personal data for generative Al.	Not applicable
Do you plan to put further implementation measures in place in the next 6 months to	Yes	Yes
substantially improve the maturity of the implementation of this commitment?		
[Yes/No]		
If yes, which further implementation measures do you plan to put in place in the next 6	Planned Implementation	Planned Implementation Measures
months?	Measures	
		Bing consistently reviews and evaluates its
	LinkedIn will continue to assess its	policies and practices related to existing
	policies and services and to	and new Bing features and adjusts as
	update them as warranted.	needed. Bing will continue to invest in its
		Responsible AI program.

Measure 15.1	LinkedIn	Bing Search
QRE 15.1.1	During the reporting period, LinkedIn continued to support and launch	Microsoft takes its commitment to responsible AI seriously and has a robust
	products and features that disseminate, and enable LinkedIn members to	Responsible AI program. In addition to the safeguards noted earlier in this
	disseminate, Al-generated textual content. LinkedIn also continues to	report, and discussed thoroughly at How Bing Delivers Search Results,
	integrate generative Al-powered features into existing products. To	Microsoft has implemented a number of measures and policies to help
	mitigate the potential safety risks posed by such features, LinkedIn has in	counter attempts to manipulate Al systems that generate content.
	place and continues to augment policies and procedures to ensure that	
	our Al systems, including any new features are consistent with LinkedIn's	Bing's generative AI experiences were developed in accordance with
	Responsible Al Principles and applicable law.	Microsoft's Al Principles, Microsoft's Responsible Al Standard, and in
		partnership with responsible AI experts across the company, including
	1. Privacy and Security – LinkedIn has an existing process for	Microsoft's Office of Responsible AI, engineering teams, Microsoft Research,
	assessing the privacy and security of new products and	and the AI Ethics and Effects in Engineering and Research (AETHER)
	initiatives, which has been augmented to recognize particular	committee. All Microsoft processes, programs, or tools utilizing AI, including
	risks arising from the use of generative Al. With respect to	Bing's generative AI experiences, must adhere to Microsoft's Responsible A
	generative AI, additional considerations include being	Standard and undertake impact assessments to help ensure responsible use
	thoughtful about the personal data used in prompt engineering	of Al-influenced algorithms and processes for any new product features.
	and ensuring that members maintain full control of their	More details on Microsoft's Responsible Al Standard, impact assessments
	profiles.	and resources on Responsible AI are located at Microsoft's <u>Responsible A</u>
	2. Safety – LinkedIn has an existing process for assessing the safety	<u>Hub</u> . Bing also conducts detailed annual risk assessments that evaluate risks
	of new products and initiatives, that has been augmented to	posed by its systems (including generative Al features) and evaluates
	recognize particular risks with generative Al. New features are	current and potential risk mitigation measures.
	carefully ramped to members and rate limits are introduced to	
	reduce the likelihood of abuse. Limiting access allows us to	In addition to the measures discussed at QREs 14.1.1 and 14.1.2 (including
	watch for issues that may arise. We aim to proactively identify	pre and post launch testing, the use of classifiers and metaprompting,
	how prompts could be misused to then mitigate potential	defensive search interventions, reporting functionality, and increased
	abuse. We engage in proactive content moderation (all Al	operations and incident response), Microsoft has incorporated the following
	generated content is held to the same professional bar as other	safeguards and policies for countering prohibited manipulative practices for
	content on the LinkedIn platform), through applying content	Al systems.
	moderation filters to both the member inputs for prompts and	
	the output. We also engage in reactive content moderation,	To help facilitate safe use of Bing's generative AI experiences, Microsoft
	through provision of member tools to report policy-violating	published Copilot Al Experiences Terms (applicable to Copilot in Bing
	issues with the content. Additional features have been added to	through its retirement in October 2024) and Bing's Image Creator Terms of

- these tools that address generative Al-specific issues such as 'hallucinations.' Additionally, all generative Al-powered features that have outputs that are directly visible to LinkedIn users, go through (1) manual and automated "red teaming," to test the generative Al-powered feature and to identify and mitigate any vulnerabilities, and (2) quality assurance assessments on response quality, accuracy, and hallucinations with the goal to remediate discovered inaccuracies.
- 3. Fairness and Inclusion LinkedIn has a cross functional team that designs policy and process to proactively mitigate the risk that AI tools, including generative AI tools, perpetuate societal biases or facilitate discrimination. To promote fairness and inclusion, we target two key areas content subject and communities. With respect to content subjects, prompts are engineered to reduce the risk of biased content, blocklists are leveraged to replace harmful terms with neutral terms, and member feedback is monitored to learn and improve. With respect to communities, in addition to a focus on problematic content like stereotypes, we are working to expand the member communities that are served by our generative AI tools. Additionally, LinkedIn continues to invest in methodologies and techniques to more broadly ensure algorithmic fairness.
- 4. Transparency LinkedIn is committed to being transparent with members. With respect to generative AI products and features, our goal is to educate members about the technology and our use of it such that they can make their own decisions about how to engage with it. For example, with Collaborative Articles we identify the use of AI in the relevant UI and we provide additional detail in a linked <a href="Help Center article">Help Center article</a>. Additionally, LinkedIn labels content containing industry-leading "Content Credentials" technology developed by the Coalition for Content

<u>Use</u> (including a user Code of Conduct) and implemented other mechanisms to help prevent and address misuse of these features. The Supplemental Terms prohibit users from "engaging in activity that is fraudulent, false, or misleading" and "attempting to create or share content that could mislead or deceive others, including for example creation of disinformation, content enabling fraud, or deceptive impersonation." Users that violate these terms may be suspended from the service. In addition, Bing's generative Al experiences may block certain text prompts that violate or are likely to violate the Code of Conduct. Repeated attempts to produce prohibited content or other violations of the Code of Conduct may result in service or account suspension. In addition,

Microsoft maintains social listening pipelines where insights and user feedback (including efforts to "jailbreak" generative AI experiences) are collected from the open Internet. These insights and user feedback are manually reviewed by humans, analyzed daily, and shared across the Bing product teams and with product leadership to identify new areas of concern and implement additional mitigations as needed. Microsoft also has set up a robust user reporting and appeal process to review and respond to user concerns of harmful or misleading content.

Bing's generative AI experiences also provide several touchpoints for meaningful AI disclosures, where users are notified that they are interacting with an AI system and are presented with opportunities to learn more about these features and generative AI, such as through in-product disclaimers, as discussed in <a href="How Bing Delivers Search Results">How Bing Delivers Search Results</a> educational FAQs, and blog posts. Empowering users with this knowledge can help them avoid overrelying on AI and learn about the system's strengths and limitations.

In addition to the measures discussed above, Microsoft has worked to deliver an experience that encourages responsible use of Bing's generative Al features and to limit the generation of harmful or unsafe images. When

Provenance and Authenticity ("C2PA"), including Al-generated content containing C2PA metadata. Content Credentials on LinkedIn show as a "Cr" icon on images and videos that contain C2PA metadata, particularly on highly visible surfaces such as the feed. By clicking the icon, LinkedIn members can trace the origin of the Al-created media, including the source and history of the content, and whether it was created or edited by Al. Additionally, LinkedIn provides members with information on how their personal data is used for generative AI in the LinkedIn Help Center, including how personal data is used for content generating AI model training. As of December 31, 2024, LinkedIn did not train content generating Al models on data from members located in the EU, EEA, UK, Switzerland, Canada, Hong Kong, or mainland China. 5. Accountability – In addition to the privacy, security, and safety processes discussed above, for AI tools we have additional assessments of training data and model cards so we can more

these systems detect that a potentially harmful image could be generated by a prompt, it blocks the prompt and warns the user.

Microsoft's Responsible AI systems will continue to improve, and Microsoft regularly incorporates user and third-party feedback reported via Bing and Copilot Feedback buttons and its user reporting tools.

See also QRE 20.1.1.

#### Measure 15.2

#### **QRE 15.2.1**

#### LinkedIn

With respect to the algorithms used for detection, moderation, and sanctioning of impermissible conduct and content, please see:

models that support our AI products and initiatives.

• QRE 15.1.1 (policies for countering prohibited manipulative practices in Al systems);

appropriately assess risks and develop mitigations for the Al

- QRE 18.1.3 (design of recommender systems and related AI);
- QRE 18.2.1 (policies and procedures to limit spread of harmful false or misleading information);
- QRE 22.2.1 (actions taken to assist members in identifying trustworthy content); and
- QRE 23.2.1 (actions taken to ensure integrity of reporting and appeals process).

## **Bing Search**

As a search engine, Bing Search operates differently from social media websites and other online platforms that host content. Bing Search does not host user-generated content and does not use algorithms to detect, moderate or sanction user-provided content except for limited circumstances outside the scope of this Code of Practice (e.g., the use of PhotoDNA software to detect and report child sexually explicit imagery uploaded to visual search). As to third party websites indexed by Bing Search, Bing Search does not use algorithms to detect, monitor or sanction such websites, except for limited circumstances outside the scope of this Code of Practice (e.g., the use of PhotoDNA software to detect and report child sexually explicit imagery). Bing users have many legitimate reasons for seeking out content in search that may be harmful or offensive in other

contexts, and so Bing Search works to provide as comprehensive and useful of a collection of results as possible and does not proactively intervene to limit access to legal content. In some limited cases Bing Search may take action to remove or limit access to third party links where quality, safety, user demand, relevant laws, and/or public policy concerns exist, but these interventions are reactive; Bing generally does not engage in proactive algorithmic interventions to remove content.

Bing's generative AI features include additional enhanced safety features such as classifiers, filters, and a bespoke metaprompt that further limits the likelihood of harmful content appearing in generative AI features. Microsoft has engaged in extensive Responsible AI reviews regarding generative AI features in order to ensure outputs are not biased or discriminatory. It has also implemented additional filtering and classifiers to prevent generative AI experiences from returning what Bing considers "low authority" content as part of an answer and to help address impermissible content and behaviors. Microsoft is also continually working to ensure that its generative features do not over-block outputs so that users are able to access the information they seek and measures and monitors conversation metrics to improve the interventions to balance the harm prevention and provide users with useful information.

Lastly, Microsoft has endeavored to provide transparency about how it designed and tested its generative AI features with responsible AI in mind via blog posts, FAQs, presentations, and responsible AI documentation, for example <a href="How Bing Delivers Search Results">How Bing Delivers Search Results</a>. In May 2024, Microsoft also released its first ever <a href="Responsible AI Transparency Report">Report</a>, which provides additional detail on Microsoft's Responsible AI programs, including insights into how Microsoft builds applications that use generative AI and makes decisions and oversees the deployment of those applications, among other things.

# **IV. Integrity of Services**

## Commitment 16

Relevant Signatories commit to operate channels of exchange between their relevant teams in order to proactively share information about cross-platform influence operations, foreign interference in information space and relevant incidents that emerge on their respective services, with the aim of preventing dissemination and resurgence on other services, in full compliance with privacy legislation and with due consideration for security and human rights risks.

	C.16	M 16.1	M 16.2
We signed up to the	LinkedIn	LinkedIn	LinkedIn
following measures of	Bing Search	Bing Search	
this commitment:			

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to	No	Yes
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable	Throughout the reporting period
		Microsoft continued to <u>publish</u>
		threat intelligence related to foreign
		<u>cyber enabled interference</u> in
		elections around the world. This
		intelligence was shared publicly so
		election authorities around the
		world, including in Romania and
		Croatia could benefit from the
		insights into foreign adversary
		activity.
		Bing participated in the Elections
		Working Group and established
		additional intake channels to

		facilitate cross-platform information sharing in relation to the French, Romanian and Croatian Elections.
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	Yes	Yes
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures	Planned Implementation Measures
	We look forward to continuing to	We look forward to continuing to
	work on this commitment with the	work on this commitment with the
	other signatories as we develop	other signatories as we develop
	further cross platform information	further cross platform information
	sharing.	sharing.

Measure 16.1	LinkedIn	Bing Search
Measure 16.1  QRE 16.1.1	LinkedIn, through Microsoft, is an active participant in and contributor to the Task-force's Crisis Response subgroup, in which it proactively provides analysis and data, related to influence operations, foreign interference in information space and relevant incidents that emerges on its service. Microsoft's internal threat detection and research teams, including Microsoft Threat Analysis Center (MTAC),	Bing Search, through Microsoft, is an active participant in and contributor to the Task-force's Crisis Response subgroup, in which it proactively provides analysis and data related to influence operations, foreign interference in information space and relevant incidents that emerges on its service.
	Microsoft Threat Intelligence Center (MSTIC), Microsoft Research (MSR), and AI For Good, collect and analyse data on actors of disinformation, misinformation and information manipulation across platforms.	Microsoft's internal threat detection and research teams, including Microsoft Threat Analysis Center (MTAC), Microsoft Threat Intelligence Center (MSTIC), Microsoft Research (MSR), and Al For Good, collect and analyse data on actors of disinformation, misinformation and information
	Moreover, LinkedIn works with numerous partners to facilitate the flow of information to tackle purveyors of disinformation, including disinformation spread by state-sponsored and institutional actors.	manipulation across platforms. These teams work with external organisations and companies to share and ingest data that help support Microsoft product and service teams effectively respond to issues and threats.

LinkedIn maintains an internal Trust and Safety team composed of threat investigators and intelligence analysts to address disinformation. This team works with peers and other stakeholders, including our Artificial Intelligence modelling team, to identify and remove nationstate actors and coordinated inauthentic campaigns. LinkedIn conducts investigations into election-related influence operations and nationstate targeting including continued information sharing on threats with industry peers and Law Enforcement on a regular basis. LinkedIn works with peer companies and other stakeholders to receive and share indicators related to fake accounts created by state-sponsored actors, such as confirmed Tactics, Techniques, and Protocols (TTPs) and Indicators of Compromise (IOC). This exchange of information leads to a better understanding of the incentives of sophisticated and wellfunded threat actors and how they evolve their TTPs to achieve those goals, which assists LinkedIn in their identification and removal. Any associated disinformation content is verified by our internal or external fact-checkers as needed, and coordinated inauthentic behaviours (CIBs) are also removed by our Threat Prevention and Defense team.

LinkedIn, along with its parent company, Microsoft, is heavily involved in threat exchanges. These threat exchanges take various forms, such as: 1) regular discussion amongst industry peers to discuss high-level trends and campaigns; and, 2) one-on-one engagement with individual peer companies to discuss TTPs and IOCs. This exchange of information leads to a better understanding of the incentives of sophisticated and well-funded threat actors and how they evolve their TTPs to achieve those goals, which assists us in their identification and removal.

LinkedIn always stands ready to receive and investigate any leads we receive from peers and other external stakeholders. In addition to one\_on-one engagement with peers, we also consume intelligence from vendors and investigate any TTPs and IOCs made available in peer

Microsoft also works to identify and track nation-state information operations targeting democracies across the world and works with trusted third-party partners for early indicators of narratives, hashtags, or information operations that can be leveraged to inform early detection and defensive search strategies for Bing. Through Microsoft's Democracy Forward team and MTAC, Microsoft also offers mediums for election authorities, including in the EEA member states, to have lines of communication with Microsoft to identify possible foreign information operations targeting elections.

See also QRE 14.1.2.

	disclosures. In turn, w	e also regularly release in	formation about policy_			
	violating content on our platform in publicly-available transparency					
	reports and blog posts.					
SLI 16.1.1 – Numbers	We look forward to providing reports where appropriate in future			See SLI 14.2.1 for defens	sive search intervention	s data, which is based in
of actions as a result				part on information and	threat intelligence gath	ered through information
of information	. 5.			sharing with third parti-	es, as well as the inte	ernal Microsoft and Bing
sharing			resources noted in QREs 16.1.1 and 14.2.1 Given the multipre approach Microsoft and Bing take to monitoring and actioning infl operations and sources of misinformation and disinformation ar multiple internal and external sources relied upon, it is challenged provide precise reporting on whether an incidence of single inform sharing results in a corresponding defensive search intervention or action.		g and actioning influence d disinformation and the spon, it is challenging to nce of single information	
- 1		Type of detected content	Other relevant metrics	Nr of actions taken Type of detected Other relevant (total) Content		Other relevant metrics
Measure 16.2	LinkedIn		Bing Search	1	1	
QRE 16.2.1	We look forward to working on this commitment with the other signatories as we develop further cross-platform information sharing.  We look forward to working on this commitment signatories as we develop further cross-platform best practices for measuring such information could be support to the commitment of the com			n information sharing and		

# V. Empowering Users

Commitments 17 - 25

# 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.

	C.17	M 17.1	M 17.2	M 17.3
We signed up to the following	LinkedIn	LinkedIn	LinkedIn	LinkedIn
measures of this commitment:	Bing Search	Bing Search	Bing Search	Bing Search

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	No	No
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable	Not applicable
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	No	No
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures	Planned Implementation Measures
	Not applicable.	Bing Search regularly reviews and evaluates its user tools, policies, and practices and adjusts and updates policies as needed. While Bing's existing programs are already designed to address these issues, Bing regularly evaluates its measures

	and endeavors to improve and work
	to respond quickly to new threats or
	issues as they arise.

Measure 17.1	LinkedIn	Bing Search
QRE 17.1.1	As the world around us changes, LinkedIn continues to evolve and	Bing Search offers a number of tools to help users understand the context and
	adapt our systems and practices for combating misinformation and	trustworthiness of search results. Even in circumstances where a user is expressly seeking
	other inauthentic behaviour on our platform, including to respond to	low authority content (or if there is a data void so little to no high authority content exists
	the unique challenges presented by world events.	for a query), Bing Search provides tools to users that can help improve their digital literacy
		and avoid harms resulting from engaging with misleading or inaccurate content. For
	LinkedIn's Professional Community Policies, which all members agree	example, Bing Search may include answers or public service announcements at the top
	to abide by on joining LinkedIn, prohibit misinformation. As	of search results pointing users to high authority information on a searched topic such
	described in more detail in our response to QRE 18.1.1, LinkedIn uses	as key global elections or warnings on particular URLs known to contain harmful
	a combination of automated and manual activity to keep content that	information (such as unaccredited online pharmacies and sites containing malware).
	violates our policies off of LinkedIn.	
		Where circumstances warrant (such as public health crises or major elections), Bing
	LinkedIn also aims to educate its members about civic discourse,	Search may provide information hubs for users to easily access a centralized repository
	electoral processes, and public security through its global team of	of high authority information.
	news editors. These editors provide trustworthy and authoritative	
	content to LinkedIn's member-base, and its content moderation	Bing Search also provides users with informative panels and direct answers to certain
	teams closely monitor associated platform conversations in a number	search queries and is now available in a multitude of global languages.
	of languages.	Bing Search's "Knowledge Cards" feature also gives users a single view of authoritative
		information on a specific topic. An example is shown below.
	In addition to broader measures, LinkedIn has taken special care to	
	counter low authority information in relation to the war of aggression	
	by Russia on Ukraine, the Israel-Hamas Conflict, and the European	
	Elections, as detailed in relevant chapters.	
	For example, during pre-election cycles, LinkedIn relies on trusted	
	and reputable publisher sources for featured shares, focusing on the	

policy impact on businesses and professionals around the EU. LinkedIn also curates links to topical landing pages from trusted publishers to provide members with easy and reliable entry points to more detailed coverage. LinkedIn does not compete with trusted publishers for speed or depth of coverage, but instead aims to connect their existing coverage to LinkedIn members and their needs. During important events in European Elections, this team provides manually curated and localised storylines.

We also work to identify and remove misinformation and inauthentic behaviour from our platform. As we continue to improve, we are committed to helping our members make informed decisions about content they find on LinkedIn, so we work with Microsoft to provide tools that assist our members in identifying trustworthy, relevant, authentic, and diverse content.

LinkedIn's <u>Professional Community Policies</u> clearly detail the objectionable and harmful content that is not allowed on LinkedIn. Misinformation and inauthentic content is not allowed, and our automated defenses take proactive steps to remove them. LinkedIn's blog provides information regarding our efforts, including <u>How We're Protecting Members From Fake Profiles</u>, <u>Automated Fake Account Detection</u>, and An Update on How We Keep Members Safe.

LinkedIn members can <u>report content</u> that violates our Professional Community Policies, including misinformation and inauthentic content. Our Trust and Safety teams work every day to identify and restrict such activity, and if reported content violates the Professional Community Policies, it will be actioned in accordance with our polices.

LinkedIn members can identify misinformation and inauthentic behaviour by utilising the News Literacy Project, The Trust Project



Bing Search provides users with public service announcements (PSAs). PSAs are user messages that appear as answer boxes at the top of a list of search results for certain triggering queries, providing information on potential risks associated with that query and/or pointing to support resources. PSAs are triggered by queries on specific topics, such as child pornography, attempts to purchase illegal pharmaceuticals, suicide, etc.

Bing search also partners with trusted election authorities to empower voters with authoritative election information on Bing. Bing leverages partnerships with EU election authorities to help direct users to trusted and/or official sources of information concerning elections and voting information.

For example, Bing launched specialized How to Vote Answers in advance of the French snap elections held June-July 2024. Examples of how these special answers appear to users are shown below.

and <u>Verified</u>, all of which develop information literacy campaigns built on industry research and best practices. The News Literacy Project campaign developed a <u>quiz</u> that tests a person's ability to identify why the information they are seeing is false and inaccurate in less than five minutes. The Trust Project campaign developed the research-backed <u>8 Trust Indicators</u>, which aim to improve consumers ability to identify reliable, ethical journalism. Finally, <u>Verified</u> delivers lifesaving information and fact-based advice to build digital literacy that helps communities protect themselves from misinformation. LinkedIn has also published an <u>article</u> in our Help Center compiling these useful resources on misinformation and inauthentic behaviour.



In addition to the features available for core search experiences, Bing generative features notify users that they are interacting with an Al system and are presented with opportunities to learn more about these features and generative Al, such as through inproduct disclaimers. For example, Bing Generative Search results displays the below disclosure to users:

		This summary was generated by AI from multiple online sources. Find the source links used for this summary under "Based on sources".  Learn more about Bing search results here
		Microsoft also offers meaningful resources for users interested in learning more about generative AI features and tools though blog posts, articles, information hubs, and support pages. In addition to teaching AI basics and how-tos, these resources reiterate the importance of checking AI-generated materials and understanding the strengths and limitations of AI. See e.g., Microsoft AI help & learning.
		As part of Microsoft's Tech Accord commitments, Microsoft has created trainings for political parties, candidates, and election officials to improve their understanding of what deepfakes are and how they can protect against their use in elections. At the time of writing, Microsoft has completed 50 separate training sessions across EEA countries reaching over 500 participants. Countries include Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Netherlands, Norway, Portugal, Slovakia, Spain, and Sweden.
		Microsoft is committed to providing resources, educational materials, and guides so that users can develop literacy when interacting with AI systems and will continue to explore ways to further educate the public on important generative AI topics.
SLI 17.1.1 - actions enforcing policies above	The table below reports the number of visitors to LinkedIn's Help Center <u>article</u> compiling useful resources on misinformation during the period 1 July – 31 December 2024.	Methodology of data measurement:  Knowledge Cards ("KC)" – Represents viewership of Knowledge Cards (of all types/topics) during the Reporting Period

				Transparency Hub Viewe	ership ("TH") – F	Represents the	total views of	the Microsoft
				Transparency Report Hub o	during the Report	ing Period.		
				Public Service Announ	coment ("DSA")	Poprocon	ts vious of	nublic convice
				announcement panels (of		•		
				Reporting Period.	an types/topics/	rendered in i	bing to Lo us	ers during the
				Taparang ranaan				
	Total count of the	Interactions/	Other relevant metrics		Interactions/	Total count	Total count	Other
	tool's impressions	engagement with			engagement	of the tool's	of the tool's	relevant
		the tool			with the tool	impressions	impressions	metrics
	Number of visits							
	during the period				W.C		DCA	
	1 July – 31 December 2024				KC	тн	PSA	
Member	2024							
States								
Austria	35				108,761,673	57	70,220	
Belgium	15				200,650,612	58	133,860	
Bulgaria	39				38,569,264	21	27,380	
Croatia	19				2,7201,309	8	21,260	
Cyprus	4				8,784,806	11	5,280	
Czech Republic	28				138,432,602	54	66,940	
Denmark	80				80,485,036	58	62,580	
Estonia	18				15,330,027	10	11,760	
Finland	81				86,792,314	46	49,120	
France	290				1,063,056,890	144	497,580	
Germany	794				1,108,464,294	324	604,440	
Greece	24				56,864,591	19	36,900	
Hungary	19				70,877,762	32	44,360	
Ireland	63				110,462,651	17	195,720	

Total EEA	7,244	6,0	26,046,031	1,845	3,073,660	
Total EU	7,184	5,9	23,719,089	1,765	3,155,880	
Norway	45	9.	4,912,507	50	76,540	
Liechtenstein	1		729,055	6	200	
Iceland	14	6	5,685,380	24	5,480	
Sweden	99	17	73,528,035	143	138,620	
Spain	109	81	16,296,463	136	206,520	
Slovenia	7	1,	,8367,447	11	13,860	
Slovakia	15	3	9,365,393	21	26,460	
Romania	56	8	3,347,298	30	59,440	·
Portugal	32	15	51,513,785	26	82,700	
Poland	166	46	53,903,783	112	202,920	
Netherlands	632	30	)9,694,218	313	251,780	
Malta	10	3	3,206,968	0	9,080	
Luxembourg	21	1	1,744,763	8	5,400	
Lithuania	185	2	8,626,206	14	23,560	
Latvia	354	1	7,582,909	11	223,340	
Italy	3,988	68	36,807,990	81	183,140	

Measure 17.2	LinkedIn	Bing Search
QRE 17.2.1	Microsoft works with leading media and information literacy partners	Microsoft works with leading media and information literacy partners
	globally to support the development and promotion of media literacy	globally to support the development and promotion of media literacy
	campaigns.	campaigns that benefit users across Microsoft services and the broader
		ecosystem.
	Microsoft has continued its partnerships with third-party organisations,	
	including the News Literacy Project and The Trust Project, to amplify media	Microsoft has also launched a media literacy initiative focusing on awareness
	literacy campaigns while continuing introductory calls with new	about deceptive use of AI on elections and how to identify AI generated
	organizations to grow additional campaigns' reach to new markets.	content: Combating the deceptive use of AI in elections (microsoft.com)

	Reginning March	2024 and co	ntinuina through	Autumn 2024, Microsoft					
	1 5 5		5 5						
	launched a new "Be Informed, Not Misled" campaign from the News Literacy Project. This campaign averages millions of impressions monthly.				In May 2024, Microsoft, in collaboration with OpenAI, launched the Societal				
	Literacy Project.	rnis campaign	averages millions	or impressions monthly.			•	n promoting Al literacy,	
	Microsoft has	also Jaunshad	a modia litoraci	v initiativo focusing on			•	related challenges. The	
			•	y initiative focusing on			-	-	
		•		ns and how to identify Al	_			gy Services from AARP, ontent Provenance and	
	generated conte	nt: Combating	the deceptive use	of Al in elections.		•		have reached national	
					1			dults, and 250 global	
								3	
	-				1 -	ring responsible Al		oach to addressing Al	
	l tr				tineats and ioste	iling responsible Al	practices.		
					As part of Micro	soft's Tech Accor	d commitments.	Microsoft has created	
								on officials to improve	
						•		they can protect against	
					their use in elections. At the time of writing, Microsoft has completed 50				
					separate training sessions across EEA countries reaching over 500				
					participants. Countries include Austria, Belgium, Denmark, Finland, France,				
					Germany, Greece, Ireland, Italy, Netherlands, Norway, Portugal, Slovakia,				
					Spain, and Sweden.				
SLI 17.2.1 -	Methodology of	data measurer	ment:		Methodology of	data measurement	··		
actions enforcing	Nr of media	Reach of	Nr of	Nr of interactions with	Nr of media	Reach of	Nr of	Nr of interactions with	
policies above	literacy/	campaigns	participants	online assets	literacy/	campaigns	participants	online assets	
	awareness				awareness				
	raising activities				raising activities				
	organised/				organised/				
	participated in				participated in				
					50 training	Countries	500		
					sessions	including	participants		
						Austria, Belgium,			
				•				"	

			Denmark,	
			Finland, France,	
			Germany,	
			Greece, Ireland,	
			Italy,	
			Netherlands,	
			Norway,	
			Portugal,	
			Slovakia, Spain,	
			and Sweden.	

Measure 17.3	LinkedIn	Bing Search
QRE 17.3.1	Microsoft continues to work with multiple organisations to develop and promote media literacy campaigns, including 2024 campaigns from the News Literacy Project and The Trust Project to promote information literacy resources on Microsoft platforms.	Microsoft continues to work with multiple organisations to develop and promote media literacy campaigns, including 2024 campaigns from the News Literacy Project and The Trust Project to promote information literacy resources on Microsoft platforms.
	For the next reporting period, Microsoft is continuing to work with existing and new partners to create, disseminate, and report on expanded literacy campaigns in EEA markets. Please also see response to QRE 17.1.1.	Since its last report, Microsoft continues to grow partnerships to strengthen the company's capacity and ability to combat information operations globally.
		Microsoft is continuing to work with existing and new partners to create, disseminate, and report on expanded literacy campaigns in EEA markets, such as delivering additional deepfake awareness trainings. Including International IDEA is on track to deliver 5 AI and Elections Trainings between November 2024 and May 2025. These trainings will reach global election officials, civil society and journalists. The training will provide participants with an enhanced understanding of AI, its ethical implications, and its uses and benefits in electoral management. Microsoft's Deepfake content will be integrated into the curriculum.

# V. Empowering Users

# Commitment 18

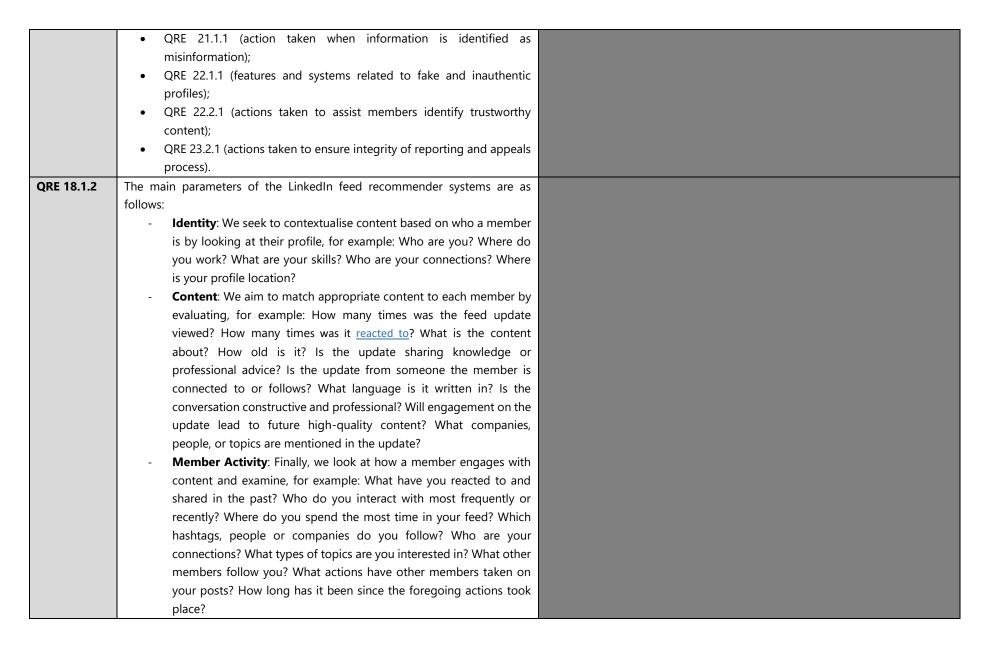
Relevant Signatories commit to minimise the risks of viral propagation of Disinformation by adopting safe design practices as they develop their systems, policies, and features.

	C.18	M 18.1	M 18.2	M 18.3
We signed up to the following	LinkedIn	LinkedIn	LinkedIn	LinkedIn
measures of this commitment:	Bing Search		Bing Search	Bing Search

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to	No	Yes
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable	Bing regularly reviews and
		implements mitigations, safeguards,
		and safe design considerations to
		help proactively address, prevent
		and mitigate harms arising from
		potential misuse of generative AI
		search experiences, including viral
		propagation of content, and
		provides updates to public facing
		transparency documents, such as
		How Bing Delivers Search Results.
		However, Bing features do not

		allow users to post or share content within Bing so virality is not possible on the platform itself.
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	Yes	Yes
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures  LinkedIn will continue to assess its policies and services and to update them as warranted.	Planned Implementation Measures  Bing is regularly reviewing and evaluating its policies and practices related to features and adjusts and updates policies as needed. Bing continues to explore additional potential research opportunities and partnerships related to the spread of harmful misinformation and/or disinformation.

Measure 18.1		This measure is not relevant or pertinent to Bing Search as search engines do not fuel virality of disinformation via users sharing content.
QRE 18.1.1	Outline relevant actions	
	<ul> <li>With respect to AI design, please see QRE 18.1.3</li> <li>With respect to additional tools, procedures, or features, please see:</li> <li>QRE 17.1.1 (editorial practices to provide members with trustworthy news);</li> <li>QRE 18.2.1 (policies and procedures to limit spread of harmful false or misleading information);</li> </ul>	



Combining these and other related signals, the LinkedIn feed recommender systems rank the content for the member, with the goal of showing the member high quality content that the member will enjoy consuming and can lead to further creation on the platform. To do this, the feed optimizes for content that a member is most likely to find highly valuable, which in turn is likely to lead the member to act on (e.g., react, comment, or reshare). **QRE 18.1.3** At LinkedIn, our guiding principle is "Members First." It ensures we honour our responsibility to protect our members and maintain their trust in every decision we make, and puts their interests first. A key area where we apply this value in engineering is within our design process. We call this "responsible design," which means that everything we build is intended to work as part of a unified system that delivers the best member experience, provides the right protections for our members and customers, and mitigates any unintended consequences in our products. One of the core pillars of "responsible design" is "responsible AI," which follows the LinkedIn Responsible Al Principles, which are inspired by and aligned with Microsoft's Responsible Al Principles. The LinkedIn Responsible Al Principles are to advance economic opportunity, uphold trust, promote fairness and inclusion, provide transparency, and embrace accountability. In addition to the LinkedIn Responsible AI Principles, responsible AI is also about intent and impact. "Intent" involves evaluating training data, designing systems, and reviewing model performance before the model is ever deployed to production to make sure that our principles are reflected at every step in the process. It includes actively changing our products and algorithms to empower every member. "Impact" covers detecting and monitoring the ways that people interact with products and features after they are deployed. We do this by measuring whether they provide significant value and empower individuals to reach their goals. Intent and impact are a cyclical process of

refinement that go hand-in-hand towards the broader goal of responsible design.

With respect to safety, we seek to keep content that violates our Professional Community Policies off of LinkedIn. This is done through a combination of automated and manual activity. Our first layer of protection is using AI to proactively filter out bad content and deliver relevant experiences for our members. We use content (like certain key words or images) that has previously been identified as violating our content policies to help inform our AI models so that we can better identify and restrict similar content from being posted in the future. The second layer of protection uses AI to flag content that is likely to be violative for human review. This occurs when the algorithm is not confident enough to warrant automatic removal. The third layer is member led, where members report content and then our team of reviewers evaluates the content and removes it if it is found to be in violation of our policies.

Quantifying the above process to monitor how many content violations are successfully prevented is another important task that our Data Science team prioritises, such that we can continuously refine our processes to improve detection and prevention of violative content.

#### Please also see:

- QRE 17.1.1 (editorial practices to provide members with trustworthy news);
- QRE 18.2.1 (policies and procedures to limit spread of harmful false or misleading information);
- QRE 21.1.1 (action taken when information is identified as misinformation);
- QRE 22.1.1 (features and systems related to fake and inauthentic profiles);

	<ul> <li>QRE 22.2.1 (actions content);</li> <li>QRE 23.2.1 (actions talprocess).</li> </ul>					
SLI 18.1.1 -						
actions	Reduction of prevalence of	Reduction of	Increase in	Other		
proving	disinformation	views/	visibility of	relevant		
effectiveness		impressions of	authoritative	metrics		
of measures		disinformation	information			
and policies						

Measure 18.2	LinkedIn	Bing Search			
QRE 18.2.1	LinkedIn is an online professional network. On LinkedIn, the world's	Unlike social media services, for which this Commitment appears primarily			
	professionals come together to find jobs, stay informed, learn new skills, and	oriented, search engines do not typically cause or facilitate the viral			
	build productive relationships. The content that our members share becomes	propagation of disinformation, as they do not allow users to post or share			
	part of their professional identity and can be seen by their boss, colleagues,	content directly on the service. Please see <u>How Bing delivers search results</u>			
	and potential business partners. Accordingly, the content on LinkedIn is	and Microsoft Bing Webmaster Guidelines for an overview of how Bing Search			
	professional in nature.	designs its algorithms to deliver high authority and highly relevant content			
		while minimizing the negative impact of spam and less credible information			
	To help keep LinkedIn safe, trusted, and professional, our <u>Professional</u>	sources. Bing Search's ranking algorithms and related policies are intended to			
	Community Policies clearly detail the range of objectionable and harmful	address deceptive tactics intended to manipulate the algorithms and are			
	content that is not allowed on LinkedIn. Fake accounts, misinformation, and	discussed in more detail at QREs 14.1.1 and 14.1.2. Bing Search features such			
	inauthentic content are not allowed, and we take active steps to remove it	as news carousels as well as the other features and policies discussed			
	from our platform.	throughout this report further help minimize the risk of viral propagation of			
		misinformation through Bing Search.			
	LinkedIn removes "specific claims, presented as fact, that are demonstrably				
	false or substantially misleading and likely to cause harm." This approach	Bing's suggestions features offer possible search queries to users to facilitate			
	applies globally and is used for purposes of content moderation and for	a more efficient search experience. While search suggestions are not directly			
	publicly reporting figures on misinformation. Specific examples of what might	tied to virality of content, Bing Search also undertakes measures to help			
	constitute misinformation can be found <u>here</u> in our Help Center. As part of	ensure it does not inadvertently lead users to misleading or other harmful			

our <u>User Agreement</u>, our Professional Community Policies are accepted by every member when joining LinkedIn and are easily available to every member.

LinkedIn creates value and preserves trust by fostering a safe, trusted, and professional platform, while honouring members' professional expression and speech. LinkedIn enables healthy on-platform conversations by facilitating the removal of misinformation that threatens its members' safety. And when content doesn't conclusively violate LinkedIn policies, LinkedIn gives the speaker the benefit of the doubt and favours speech (i.e., leaves the content up on platform).

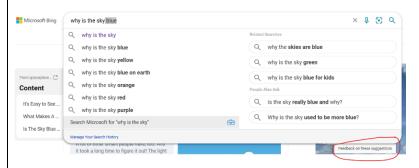
Additionally, as described in greater detail below, human review plays a significant role in our content moderation process. Additionally, Members who post content and members who report content can appeal our content moderation decisions.

Our content policies are clear and we apply them equally for all members. Within our Professional Community Policies we provide granular information and examples on what is and what is not allowed on LinkedIn.

Furthermore, LinkedIn has automated defences to identify and prevent abuse, including inauthentic behaviour, such as spam, phishing and scams, duplicate accounts, fake accounts, and misinformation. Our Trust and Safety teams work every day to identify and restrict inauthentic activity. We're regularly rolling out scalable <u>technologies</u> like machine learning models to keep our platform safe.

content through suggestions. Specifically, Bing Search uses a combination of proactive and reactive algorithmic and manual interventions to prevent the display of search suggestions that could lead to low authority content.

Bing Search also provides a tool for users to provide feedback on suggestions they encounter. The feedback tool is shown below.



Clicking "Feedback on these suggestions" allows users to provide specific feedback on individual suggestions on the below bases:

## These suggestions are:

- Not relevant
   Not correct
- Misspelled or garbled
- Inappropriate or offensive
- Hateful to groups or individuals
- About illegal or dangerous activity
- Other

There is generally no risk of viral spread of generated content through Bing and Bing's generative AI experiences because Bing does not allow users to directly post or otherwise share content on the platform. Bing also takes steps to prevent the service from being used to create content or images that might be shared on other platforms through a multipronged approach. This

#### approach includes terms of use and a code of conduct, classifiers, filters, bespoke metaprompts, and robust reporting mechanisms designed to mitigate the risk of potential misuse of the platform. Supplemental Terms addressing AI powered search experiences in Bing, for example, prohibit users from using the service to generate fraudulent or misleading information, including the creation of disinformation. Bing's ranking and relevance systems for search, which are an essential component to answering user questions, work to ensure that high authority content is returned first in search results in traditional search and in chat. Where Bing's systems flag that a user's prompt or generated output may result in low authority or misleading information, the system will take steps to mitigate that possible harm through solutions, such as not returning generated content to the user, diverting the user to a different topic, or redirecting the user to traditional search. Users who encounter problematic content can report concerns via Feedback or Report a Concern tools. SLI 18.2.1 -Methodology of data measurement: Methodology of data measurement: actions taken in The table below reports metrics concerning content LinkedIn removed from Bing Search does not have data relevant to this SLI. Users come to Bing its platform as Misinformation, pursuant to the policy outlined in QRE 18.2.1 response to Search with a specific research topic in mind and expect Bing Search to policy above. The metrics include: provide links to the most relevant and authoritative third-party websites on violations the number of pieces of content removed as Misinformation the Internet that are responsive to their search terms. Bing Search does not between 1 July - 31 December 2024, broken out by EEA Member have a news feed for users of user content, allow users to post and share State: content within Bing, or otherwise enable content to go "viral" on Bing. See the number of those content removals that were appealed by the response to SLI 14.2.1 for relevant metrics. content author; the number of those appeals that were granted; the median time from appeal-to-appeal decision for those appeals. The metrics are assigned to EEA Member State based on the IP address of the of the content author.

	The number of	The number of	The number	The median time	Total no of	Metric 1:	Metric 2:	Metric 3:
	pieces of content	removals that	of appeals	from appeal-to-	violations	indicating the	indicating the	indicating the
	removed as	were appealed	that were	appeal decision in		impact of the	impact of the	impact of the
	Misinformation	by the content	granted	hours		action taken	action taken	action taken
	between 1 July – 31	author						
	December 2024							
Member								
States								
Austria	177	2	0	1.5 hours				
Belgium	445	3	1					
Bulgaria	36	0	0					
Croatia	54	3	0					
Cyprus	13	1	1					
Czech Republic	88	1	0					
Denmark	291	2	0					
Estonia	9	0	0					
Finland	52	1	0					
France	3,452	14	1					
Germany	1,639	40	2					
Greece	164	2	0					
Hungary	40	1	0					
Ireland	136	0	0					
Italy	1,264	15	2					
Latvia	7	0	0					
Lithuania	24	2	0					
Luxembourg	62	0	0					
Malta	11	1	0					
Netherlands	3,308	38	5					
Poland	128	2	0					
Portugal	189	5	1					
Romania	151	3	0					

Total EEA	12,710	144	14
Total EU	12,605	142	14
Norway	99	2	0
Liechtenstein	0	0	0
Iceland	6	0	0
Sweden	209	1	0
Spain	640	6	1
Slovenia	8	0	0
Slovakia	8	0	0

TOTAL LLA	12,710	1-7-7	14		IN/A	IN/A	IN/A	IN/A
Measure 18.3	LinkedIn				Bing Search			
QRE 18.3.1	Microsoft maintains an internal research team — the Microsoft Threat Analysis			Bing Search regularly		•		
	Center (MTAC) — that conducts research on information influence operations			and conducts user st			·	
	and publishes both internal and public reports on its findings.			processes. Bing Sea	· ·			
				Research and third				
	Microsoft also works with Princeton University on the creation of hub for			research and internal	I studies concerning	safe design praction	ces, responsible AI,	
	researchers to access data from social media companies to improve the							
	identification and tracking of cyber enabled information operations. This accelerator will be available to researchers around the world including in			Bing also operates the Bing Qualified Researcher Program to enable EU				
	Europe.	valiable to researc	liers around th	e world including in	researchers to request access for publicly accessible Bing data from a singular			
	Larope.				landing page.	se decess for publicly	accessible billig at	ata irom a singalar
					31 3			
					Microsoft also funds and works with Princeton University on the creation of			on the creation of
					hub for researchers	to access data from	social media com	panies to improve
					the identification and	d tracking of cyber e	enabled informatio	on operations. This
				accelerator will be a	available to researc	hers around the v	world including in	
					Europe.			
					6.5			
					Microsoft Research		_	· ·
					publish research that			_
					misinformation and	disinformation. IV	iicrosoft research	ers are currently

				went viral during detection of bias  Microsoft maintai Center (MTAC)— and publishes bot global hubs and Additionally, Microdata and research Search.  Bing Search look collaborate with a discussions with	the COVID- in mainstream ns an internal that conducts h internal and d conducts in osoft funds and h that they cor s forward to co the research co	19 pandemic and news in connection research team—the research on inform public reports on it intelligence analysist works with externious intelligence analysist works with externious into Microsoft continued opportunity on future ganizations and the news in the pandemic and the news in the pandemic and the news in the pandemic and the news in the news	research concerning the on with elections.  Me Microsoft Threat Analysis nation influence operations its findings. MTAC maintains its in over 13 languages. It products, including Bing on the products, including Bing on the research and is in active the research community on each and new generative Al
	<u> </u>		V. Empowering U	sers			
_	Commitment 19  Relevant Signatories using recommender systems commit to make them transparent to the recipients regarding the main criteria and parameters used for prioritising or deprioritising information, and provide options to users about recommender systems, and make available information on those options.						
		C.19				M 19.1	M 19.2
We signed up t	signed up to the following LinkedIn					LinkedIn	LinkedIn
measures of th	is commitment:	Bing Search				Bing Search	Bing Search
			LinkedIn		Bing Search	1	

In line with this commitment, did you deploy new	No	No
implementation measures (e.g. changes to your terms of		
service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet	New Implementation Measures	New Implementation Measures
points].		
	Not applicable.	Not applicable.
Do you plan to put further implementation measures in place	No	Yes
in the next 6 months to substantially improve the maturity of		
the implementation of this commitment? [Yes/No]		
If yes, which further implementation measures do you plan to	Planned Implementation Measures	Planned Implementation Measures
put in place in the next 6 months?		
	Not applicable	Bing regularly updates its policies and terms and
		conditions to account for product changes, user feedback,
		and evolving legal considerations.

Measure 19.1	LinkedIn	Bing Search
QRE 19.1.1	LinkedIn has published a variety of articles to explain to users how our recommender systems work, including: "Mythbusting the Feed: How the Algorithm Works"; "Mythbusting the Feed: Helping our members better understand LinkedIn"; "Keeping your feed relevant and productive"; LinkedIn Safety Series: Using AI to Protect Member Data; "Guide: Features to Help You Control Your Feed and Conversations"; Our approach to building transparent and explainable AI systems, Suggested Posts in Feed. During earlier reporting periods LinkedIn collated and expanded upon existing resources to further explain the main parameters of LinkedIn recommender systems and options provided to users to influence and control these recommender systems.	Bing's search engine ranking algorithms are not a traditional "recommender system" in that Bing Search only provides content to users as a result of their express request, rather than pushing content to users who were not expressly seeking it. That said, the main parameters of Bing Search's ranking algorithms are published in the "How Bing Ranks Search Results" section of How Bing Delivers Search, which is available to Bing Search users in the EU. Bing Search also provides information on how it ranks and returns search suggestions in the Enhanced Search Experiences section of How Bing Delivers Search Results. Bing's ranking algorithms apply equally to traditional search results and generative AI features that extend to Bing.
		Please also see QREs 14.1.1, and 22.2.1.

Additionally, LinkedIn addresses automated processing and relevancy in the LinkedIn <u>User Agreement</u> and it includes a link to the above referenced Help Centre article in Section 3.6 of the LinkedIn User Agreement, which section focuses on recommendations and automated processing. During an earlier reporting period, LinkedIn launched a <u>new setting</u> for members to control the default for how their LinkedIn feed is presented to them. Members can now change their preferred feed view from "most relevant first" to "most recent first". "Most relevant first" means that LinkedIn will use data from the member's profile and LinkedIn activity data to rank feed content based on the member's interests. "Most recent first" means that LinkedIn will not use the member's profile and LinkedIn activity data to rank feed content and will instead show updates from the member's network in reverse chronological order.

As reported in an earlier report, in August 2023, LinkedIn launched two new experiences in the EU. Additional detail is included below:

- LinkedIn launched a revised and expanded experience to enable Members to change how their Feed experience is presented to them. The choice is presented in the Feed (on desktop, mobile app, and mobile web) and it also points members to the setting referenced above where members can change the default sort of their Feed. Members can toggle between the following two choices: "most relevant first" or "most recent first." The default sort option is "most relevant first." If the Member toggles to "most recent first," that choice will only persist for the current feed view on that particular device.
- LinkedIn also launched a new setting within a Member's
  Account Preferences settings so Members can change the
  default sort option from "most relevant first" to "most recent
  first." Changing that setting will persist across sessions and
  devices. Members can learn more about this experience and the
  setting in our Help Center.

Measure 19.2	LinkedIn		Bing Search		
SLI 19.2.1 – user settings	37		Methodology of data measurement:		
_		to have their LinkedIn feed experience sorted the default of how their LinkedIn feed etting.	Bing Search allows users to turn off search suggestions (including auto-suggest and related search suggestions) ("AS/RS") in its user setting page, as shown below:		
	"preferred feed view" settin	) the number of EEA members who used the g between 1 July – 31 December 2024; and (2) the members used the "preferred feed view" December 2024.	Search suggestions  See search suggestions as you type  In the Bing image experience, users can turn off personalized search suggestions through the Settings pane. Bing anticipates providing reporting on utilization of		
	The metrics are assigned to profile location of the mem	EEA Member State based on the self-reported ber.	this new measure in forthcoming reports.  Users may also access, view, and delete their previous search queries in the Microsoft Account Privacy dashboard or clear their search history in Bing Search settings, which in turn will remove that content from any personalized search suggestions.		
	No of times users actively engaged with the "preferred feed view" setting		Bing is currently building out expanded data retention and reporting functionalities related to this Commitment.		
			No of times users engaged with the search suggestion feature		
Data	The number of EEA members who used the "preferred feed view"  July – 31 December 2024				
Member States	setting between 1 July – 31 December 2024				
Austria	2,024	3,021			

Belgium	3,108	4,719	
Bulgaria	492	793	
Croatia	502	903	
Cyprus	256	391	
Czech Republic	1,179	1,742	
Denmark	2,495	3,760	
Estonia	294	444	
Finland	2,749	4,137	
France	21,112	33,303	
Germany	21,565	32,823	
Greece	1,305	2,031	
Hungary	777	1,148	
Ireland	2,757	4,212	
Italy	7,160	10,794	
Latvia	256	423	
Lithuania	387	606	
Luxembourg	460	686	
Malta	195	298	
Netherlands	13,698	21,132	
Poland	3,817	5,657	
Portugal	2,781	4,241	
Romania	1,357	2,269	
Slovakia	368	575	
Slovenia	268	389	
Spain	10,006	14,665	
Sweden	4,628	7,014	
Iceland	41	57	
Liechtenstein	24	44	
Norway	1,141	1,878	

Total EU	105,996	162,176	
Total EEA	107,202	164,155	81,409,838

# 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.

	C.20	M 20.1	М 20.2
We signed up to the following measures of this commitment:	LinkedIn	LinkedIn	LinkedIn
	Bing Search	Bing Search	Bing Search

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes	No	Yes
to your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable	Microsoft has continued to improve
		content provenance measures on its Al
		image generation features, including
		continuing to pilot Content Integrity
		Tools that allowed users to add content
		credentials to their own authentic
		content (discussed further below).
Do you plan to put further implementation measures in place in the next 6 months to	No	Yes
substantially improve the maturity of the implementation of this commitment? [Yes/No]		

If yes, which further implementation measures do you plan to put in place in the next 6	Planned Implementation Measures	Planned Implementation Measures
months?		
	Not applicable	Microsoft expects to continue its
		important work in content provenance
		tools and ways to help counter harmful
		Al-generated content.

Measure 20.1	LinkedIn	Bing Search
QRE 20.1.1	Microsoft is a founding and active member of the Coalition for Content Provenance and Authenticity (C2PA) and is currently a cochair.  On 15 May 2024, LinkedIn announced that, starting that day, content containing the Coalition for Content Provenance and Authenticity's industry-leading "Content Credentials" technology (C2PA) will be automatically labelled on LinkedIn. Since LinkedIn began ramping Content Credentials, users are beginning to see the "Cr" icon on images and videos that contain C2PA metadata. By clicking on the icon, users are able to trace the origin of the Al-created media, including the source and history of the content, and whether it was created or edited by Al. The first place users will see the Content Credentials icon is on their LinkedIn feed, and LinkedIn is working to expand coverage to additional surfaces, including ads. By providing a verifiable trail of where content originates from and whether it was edited, C2PA helps keep digital information reliable, protect against unauthorized use, and create a transparent, secure digital environment for creators, publishers, and members. LinkedIn has also published an article in its Help Center which provides more information on C2PA and Content Credentials.	Microsoft and key members of the Bing Search team are also involved in the Partnership on AI ("PAI") to identify possible countermeasures against deepfakes and has participated in the drafting and refinement of PAI's proposed Synthetic Media Code of Conduct. The proposed Code of Conduct provides guidelines for the ethical and responsible development, creation, and sharing of synthetic media (such as AI-generated artwork).  Microsoft is deeply focused on the potential risk that deepfakes and other abusive AI-generated content could be used to proliferate election-related misinformation, deceive the public, and potentially undermine trust in online content and our elections. For those reasons, we were a founding member of the Coalition for Content Provenance and Authenticity (C2PA). The C2PA is a coalition of technology companies, media, and others created to address the prevalence of misleading information online by developing technical standards to certify the source and history of media content. Pursuant to the C2PA specification, generative AI specifies techniques to add "Content Credentials" to online media consisting of metadata about the media's provenance and authenticity. In turn, that information provides consumers with a way to verify the history and trustworthiness of the media. Credentials are already added to all generative AI images created with our most popular consumer-facing AI image generation tools, including Image Creator, Microsoft Designer, and Copilot.

		In July 2023, Microsoft agreed to make a number of voluntary commitments related to furthering safe and trustworthy AI systems, including a commitment to deploy new state-of-the-art provenance tools to help the public identify AI generated audio-visual content and understand its provenance. See more at Our commitments to advance safe, secure, and trustworthy AI - Microsoft On the Issues.  In addition, Microsoft has continued piloting Content Integrity Tools, which allowed users to add content credentials to their own authentic content. Designed as a pilot program primarily to support the 2024 election cycle and gather feedback about Content Credentials-enabled tools, during the reporting period of this report, the tools were available to political campaigns in the EU, as well as to elections authorities and select news media organizations in the EU and globally. These tools included a partnership and collaboration with fellow Tech Accord signatory, TruePic. Announced in April 2024, this collaboration leveraged TruePic's mobile camera SDK enabling campaign, election, and media participants to capture authentic images, videos and audio directly from a vetted and secure device. Called the "Content Integrity Capture App" (an app that makes it easy to directly capture images with C2PA enabled signing) launched for both Android and Apple and can be used by participants in the Content Integrity Tools pilot program.
Measure 20.2	LinkedIn	Bing Search
QRE 20.2.1	Microsoft is a founding member of the Coalition for Content Provenance and Authenticity (C2PA). The C2PA Coalition aims to address the prevalence of disinformation, misinformation, and online content fraud through developing technical standards for certifying the source and history or provenance of media content.	The Tech Accord's commitments make it more difficult for bad actors to use legitimate tools to create deepfakes and easier for users to identify authentic content. This focuses on the work of companies that generate Al content as well as those that distribute it and calls on them to strengthen the safety architecture in Al services by assessing risks and strengthening controls to help prevent abuse. For its part, Microsoft has taken steps to meet the

As detailed in the response to QRE 20.1.1., LinkedIn has also adopted the C2PA's industry-leading "Content Credentials" technology to include metadata labelling, including data about whether content is created using AI, on content containing the C2PA technology.

Further information on C2PA is available on its website here.

commitments in the Tech Accord by further implementing content provenance, establishment of reporting channels, and improved detection capability. For example, Microsoft maintained launched a new web page – Microsoft-2024 Elections – where a political candidates and election authorities can report a concern about a deepfake of themselves deceptive Al targeting themselves or their election.

Microsoft has worked to harness the data science and technical capabilities of our AI for Good Lab and MTAC teams to better assess whether abusive content—including that created and disseminated by foreign actors—is synthetic or not. Microsoft AI for Good lab has been developing detection models (image, video) to assess whether media was generated or manipulated by AI. The model is trained on approximately 200,000 examples of AI and real content. AI for Good continues to invest in creating sample dataset representing the latest generative AI technology. When appropriate, Microsoft calls on the expertise of Microsoft's Digital Crimes Unit to invest in and operationalize the early detection of AI-powered criminal activity and respond appropriately, through the filing of affirmative civil actions to disrupt and deter that activity and through threat intelligence programs and data sharing with customers and government.

#### **V. Empowering Users**

#### Commitment 21

Relevant Signatories commit to strengthen their efforts to better equip users to identify Disinformation. In particular, in order to enable users to navigate services in an informed way, Relevant Signatories commit to facilitate, across all Member States languages in which their services are provided, user access to tools for assessing the factual accuracy of sources through fact-checks from fact-checking organisations that have flagged potential Disinformation, as well as warning labels from other authoritative sources.

C.21 M 21.1 M 21.2 M 21.3

We signed up to the following	LinkedIn	LinkedIn	LinkedIn	LinkedIn
measures of this commitment:	Bing Search	Bing Search		Bing Search

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to	No	No
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable	Not applicable
Do you plan to put further implementation measures in place in the next 6 months to	No	Yes
substantially improve the maturity of the implementation of this commitment? [Yes/No]		
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures	Planned Implementation Measures
	Not applicable	Bing continues to evaluate additional
		tools and resources that support the
		spirit of this commitment.

Measure 21.1	LinkedIn	Bing Search
QRE 21.1.1	As detailed above in QRE1.1.1 and 17.1.1, LinkedIn prohibits	Bing Search provides a range of features and tools to help users determine
	misinformation and disinformation on its platform, whether in the	the reliability of content displayed in Bing search results.
	form of organic content or in the form of advertising content.	
	LinkedIn's <u>Professional Community Policies</u> , which apply to all	Since 2017, Bing Search has ingested content from the public ClaimReview
	content on LinkedIn's platform, expressly prohibit the sharing of false	protocol made available through Schema.org and displayed fact check tags
	or misleading content, including misinformation and disinformation.	within search results for websites that have incorporated ClaimReview tags.
		<u>ClaimReview</u> functions as a tagging system that individual fact-checking
	Where content is identified as misinformation (whether as a result of	organizations or media can use to identify their articles for search engines
	a report or proactively detected), we do not label it, rather it is	and social media platforms. Content tagged with a ClaimReview tag is "read"
	removed from LinkedIn. This includes situations where LinkedIn	by Bing Search's search engine crawlers when ingesting websites for their

personnel leverage the conclusions of fact checkers to determine whether the content at issue violates LinkedIn's Professional Community Policies.

Please also see our response to QRE 17.1.1 which details how our internal team of experienced news editors provides trustworthy news about current events from verified sources and other steps we take to tackle disinformation.

index and is used by Bing Search to help promote and/or highlight fact-checked content in search results. See additional information at <u>Bing adds Fact Check label in SERP to support the ClaimReview markup | Webmaster Blog</u>. Bing Search also utilizes ClaimReview and fact check data feeds from the from DataCommons.org.

Fact-checks and articles from news and fact checking organizations may also appear as part of Bing Answers or similar features directed to users. In addition, news and fact-check articles can appear in Bing News verticals, which are often presented at the top of search results pages, depending on the user query.

In addition to the resources discussed above, Bing maintains an additional fact-checking agreement to provide coverage in the following EEA languages: Bulgarian, Croatian, Czech, Dutch, English, Finnish, French, German, Greek, Hungarian, Polish, Portuguese, Romanian, Slovak, Spanish, and Swedish. In addition to the EU languages enumerated above, the fact-checking agreement also covers Catalan and Serbian languages, among others.

Bing's generative AI features are subject to robust safety classifiers (which are informed by data shared by information integrity partners and other authority signals) to prevent the creation of low authority materials or disinformation. As Bing's generative AI features prohibit the creation of misleading content, and Bing does not allow users to publish or share content created by the system on the platform, in-product fact checks are not relevant to Bing's generative AI features. Moreover, generative responses are grounded in high authority web search results, and we provide links to websites so that users can learn more and evaluate the content for themselves.

						r media literacy to	ools in Bing Sea	rch, please
				see QRE 17.1	l.l.			
SLI 21.1.1 - actions taken under measure	Methodology of data	measurement:		Methodolog	y of data measure	ment:		
21.1	labels, content that violates policy on <u>false and misleading content</u> .  Accordingly, the metrics for this SLI for the period 1 July – 31 December 2024 is zero.			articles incor cannot feasi purposes of	porating ClaimRevelop bly assess the loc this metric. There	ema.org ClaimRevion view tags are inges ation of the webs efore, when calcul oses of SLI, Bing	ited in the Bing lite or its opera lating the locat	index. Bing stor for the sion of fact
				tag (i.e. fact-	check content) th	er of distinct URLs at appeared on th s located in the EU	e first page of I	Bing search
				the first pag- and the EEA checks to o websites with cannot reaso its search ind checks depe	e of Bing search re. Bing cannot proving in a second of the second of th	nes the above-me esults to a user loc ride data on the ras of fact-checked and thus there is referenced is provided below, thuser's unique sections.	rated in EU Mer atio of impression content, as B no ratio to assess or fact checks a as the appeara	onber States ons of fact- ing ingests is. Bing also available on ance of fact
	Total impressions of fact-checks	Ratio of impressions of fact-checks to original impressions of fact-checked content	Reach of labels/ fact- checkers and other authoritative sources	Other pertinent metric	Total impressions of fact-checks	Ratio of impressions of fact-checks to original impressions of fact-checked content	No of labels/ fact- checkers and other authoritativ e sources	Other pertinent metrics

	(N/A)	(FCI)	(N/A)	(FCURLs)	(N/A)
Member States					
Austria		34,509		4,698	
Belgium		60,454		5,999	
Bulgaria		2		2	
Croatia		1		1	
Cyprus		1		1	
Czech Republic		1		1	
Denmark		13,443		2,519	
Estonia		1		1	
Finland		9,591		1,629	
France		212,276		9,081	
Germany		3,968,924		17,342	
Greece		1		1	
Hungary		3		3	
Ireland		38,151		5,806	
Italy		68,653		5,939	
Latvia		1		1	
Lithuania		3		3	
Luxembourg		1		1	
Malta		0		0	
Netherlands		9,292		97,193	
Poland		59,184		4,690	
Portugal		38,493		4,212	
Romania		22		18	
Slovakia		1		1	
Slovenia		0		0	
Spain		161,600		7,793	
Sweden		39,686		5,756	

Iceland			6	6	
Liechtenstein			1	1	
Norway			23942	4,456	
Total EU			4,802,195	84,790	
Total EEA			4,826,144	89,253	

SLI 21.1.2 - actions taken	Methodology of data n	neasurement:		Methodology of data me	asurement:	
under measure 21.1						
	As detailed in respons	e to QRE 21.1.1, Linke	dIn removes, rather	Metrics concerning "user	interactions" and "labe	lling of content" are not
	than labels, content tha	t violates our policy on	false and misleading	applicable to Bing, as it is	a search engine. Bing de	oes not apply fact-check
	content. Accordingly, th	ne metrics for this SLI fo	or the period 1 July –	labels to websites; rathe	r websites must embe	d a ClaimReview tag in
	31 December 2024 is z	ero.		order for Bing to ingest a	and display fact-check t	ags for a website within
				search results. Bing canno	ot quantify the number	of articles published by
				independent fact-checke	rs that are available or	n the Bing Search index
				given the immense scale	of search engine indexe	es. See SLI 21.1.1.
	Nr of articles	Nr of labels applied	Meaningful	Nr of articles published	Nr of labels applied	Meaningful metrics
	published by	to content, such as	metrics such as	by independent fact-	to content, such as	such as the impact of
	independent fact-	on the basis of such	the impact of	checkers	on the basis of such	21.1. measures on
	checkers	articles	21.1. measures on		articles	user interactions with,
			user interactions			or user re-shares of,
			with, or user re-			content fact-checked
			shares of, content			as false or misleading
			fact-checked as			
			false or			
			misleading			

Measure 21.2	LinkedIn	This Measure is not relevant or pertinent to Bing Search as it does not
		host the content and cannot assess the extent to which content or
		indexed landing pages has reached its users.

QRE 21.2.1	LinkedIn has to date not undertaken and/or supported separate research and testing on the potential efficacy of warnings or updates targeted to users that have interacted with content that was later actioned upon for violation of our Professional Community Policies.  Given LinkedIn currently removes, rather than labels, content that violates our policy on false and misleading content, LinkedIn may be unable to provide meaningful context to users as to the specific content that they had viewed which was later actioned.	
	To the extent others have conducted such research and/or testing, LinkedIn is happy to discuss findings within the relevant Task-force Subgroups in view of identifying relevant follow-up actions.  LinkedIn	Bing Search
Measure 21.3	Linkedin	bing search
QRE 21.3.1	As detailed in response to QRE 21.1.1, LinkedIn removes, rather than labels, content that violates our policy on <u>false and misleading content</u> .	Bing Search regularly consults research and evidence, including from internal Microsoft research and data science teams, related to safe design practices, labeling, and user experience and considers such research as part of its product design and testing. Bing Search also conducts internal research and user studies for product features, such as by analyzing impressions, engagement, or clicks of various features. Bing Search also has a "feedback" button easily accessible from any page of Bing. Bing Search reviews and may make improvements based on user feedback. Bing Search also regularly consults with third party organizations to hear feedback about product design and related safety considerations.
		As to fact check labels, Bing Search participated in the W3C organization that helped to design and promote Schema.org and ClaimReview and

	regularly meets with stakeholders to discuss common issues, including whether updates to these common schemas are necessary.
	Microsoft's Responsible AI team and product teams have worked to develop labeling and warning systems – as well as robust support and educational resources – to help ensure users are informed that AI-powered answers can have inaccuracies and to encourage users to consult the source links provided. Microsoft's Responsible AI team is staffed by a cross-disciplinary team of experts in AI, who consult regularly with external experts in the field to ensure our labels and warnings are designed in accordance with best practices.

## **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.

	C.22	M 22.1	M 22.2	M 22.3	M 22.4	M 22.5	M 22.6	M 22.7
We signed up to the	LinkedIn	LinkedIn	LinkedIn	LinkedIn				LinkedIn
following measures of this	Bing Search		Bing Search	Bing Search				Bing Search
commitment:								

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to	No	No
your terms of service, new tools, new policies, etc)? [Yes/No]		

If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable	Not applicable.
Do you plan to put further implementation measures in place in the next 6 months to	No	No
substantially improve the maturity of the implementation of this commitment? [Yes/No]		
If yes, which further implementation measures do you plan to put in place in the next 6	Planned Implementation Measures	Planned Implementation Measures
months?		
	Not applicable.	Bing regularly evaluates opportunities
		to improve its product and educate
		users on the trustworthiness and
		limitations of Al.

Measure 22.1	LinkedIn	This Measure is not relevant or pertinent to Bing Search as it
		does not allow users to share content.
QRE 22.1.1	In October 2022, LinkedIn began offering an "About this profile" feature that shows	
	members when a Profile was created, when the member's contact information and Profile	
	photo were last updated, and if the member has verifications associated with their profile	
	(like a workplace or identity verification). LinkedIn also has rolled out a range of free	
	verifications, which allow our members to verify certain information about themselves, like	
	their association with a particular company or educational institution or their identity	
	(through one of LinkedIn's verification partners e.g. in the EEA LinkedIn's identity	
	verification partner is Persona).	
	The above features can be strong user empowerment tools. Specifically, they can provide	
	our members valuable authenticity signals to help them make more informed decisions	
	about what content and individuals they engage with online.	
	Methodology of data measurement:	

	The table below was suferior and in the second	- FFA					
	•	g EEA member use of the "About this profile"					
		e metrics include: (1) the number of members					
	·	etween 1 July – 31 December 2024; and (2) the					
		aggregate number of times those members used the feature between 1 July – 31 December					
	2024.						
	The metrics are assigned to EEA Member State based on the self-reported profile location						
SLI 22.1.1 - actions	of the member.						
enforcing policies	Percentage of users that have enabled the	The aggregate number of times those					
above	trustworthiness indicator	members used the feature between 1 July –					
	The control of manhamatha and the	31 December 2024					
	The number of members who used the						
	"About this profile" feature between 1 July						
	– 31 December 2024						
Member States							
Austria	201,047	497,213					
Belgium	416,378	1,008,087					
Bulgaria	67,997	173,071					
Croatia	49,369	107,802					
Cyprus	34,730	102,045					
Czech Republic	153,427	381,771					
Denmark	331,225	805,215					
Estonia	29,112	79,910					
Finland	146,719	330,688					
France	2,773,641	7,030,529					
Germany	1,754,780	4,557,455					
Greece	162,018	420,517					
Hungary	98,215	228,240					
Ireland	242,133	620,914					
Italy	1,186,530	2,655,054					
		1					

Total EEA	12,012,333	29,827,523	
Total EU	11,833,527	29,435,930	
Norway	168,496	369,054	
Liechtenstein	2,915	7,234	
Iceland	7,395	15,305	
Sweden	437,507	1,037,882	
Spain	1,253,059	3,172,615	
Slovenia	28,765	63,266	
Slovakia	46,635	114,738	
Romania	188,243	461,845	
Portugal	326,189	770,593	
Poland	508,088	1,319,937	
Netherlands	1,236,806	3,065,899	
Malta	24,417	62,099	
Luxembourg	47,455	131,560	
Lithuania	57,795	162,218	
Latvia	31,247	74,767	

Measure 22.2	LinkedIn	Bing Search
	LinkedIn does not prioritise any new sources in our feed, but in crisis	Bing Search utilizes a variety of signals – including from trusted third parties
	situations, (e.g., Ukraine), we will use our manually curated Trusted	as one of several means to help determine the authority score of a given
	Storylines to point members to reputable sources of information.	website and rank it accordingly in search results.
	LinkedIn's focus, in addition to pointing members to trustworthy	Bing Search also relies upon signals to help ensure that its search systems and
QRE 22.2.1	content, has been to prohibit members from sharing harmful content	features, such as auto-suggest and related search functions, direct users to
	on the platform. As a real identity online professional networking	high authority, trustworthy results and do not inadvertently suggest low
	platform, content posted by members is seen by that member's	authority or misleading content.
	colleagues, employer, and potential business partners. Consequently,	
	members do not tend to post reputationally harmful content like	
	misinformation, and such content does not gain traction on LinkedIn	

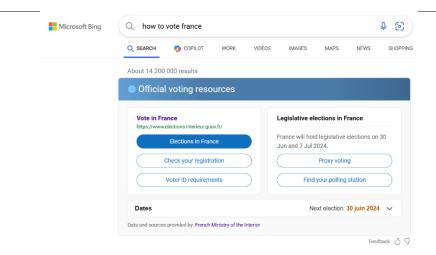
	for the come was an New theless where with form of the form of	The share and share and the Director of a sixty of a sample of a second of the U.S.
		The above mechanisms and the Bing algorithm's emphasis on promoting high
		authority content are applied equally to the new Bing generative AI features
	systems.	to help ensure that users are protected from inadvertently being exposed to
		harmful or low authority information in the new Bing experience.
Measure 22.3	LinkedIn	Bing Search
	In addition to the LinkedIn <u>User Agreement</u> , LinkedIn has established	The above-mentioned policies and measures are available to EU users in EU
	and published (a) the LinkedIn <u>Professional Community Policies</u> to	languages through the <u>Microsoft Bing Webmaster Guidelines</u> and <u>How Bing</u>
	set out and elaborate on LinkedIn's requirements and expectations	delivers search results.
	for its member base; and (b) help center content that collates and	
	expands upon existing resources to further explain the main	
	parameters of LinkedIn recommender systems and options provided	
	to users to influence and control these recommender systems.	
	The Professional Community Policies and help center content are	
	published on our platform and available in all languages that LinkedIn	
	currently supports, including the following official EU and EEA	
	languages: English, Czech, Danish, Dutch, Finnish, French, German,	
QRE 22.3.1	Greek, Hungarian, Italian, Norwegian, Polish, Portuguese, Romanian,	
QILL EE.S. I	Spanish and Swedish. Additionally, we have extended this language	
	coverage in accordance with the Digital Services Act.	
	LinkedIn seeks to reflect the best version of professional life through	
	a community where we treat each other with respect and help one	
	another succeed.	
	The Professional Community Policies have three main elements: (1)	
	Be Safe, (2) Be Trustworthy and (3) Be Professional. Additionally, the	
	Professional Community Policies set out how members can report	
	content that may violate our policies and that a violation of our	
	Professional Community Policies can result in action taken against	
	that member's account or content.	

	<ol> <li>Be Safe: do not post harassing content; do not t incite, or promote violence; do not share material d the exploitation of children; do not promote, sell or to purchase illegal or dangerous goods or services share content promoting dangerous organisati individuals.</li> <li>Be Trustworthy: do not share false or misleading connot create a fake profile or falsify information about y do not scam, defraud, deceive others.</li> <li>Be Professional: do not be hateful, do not engage i innuendos or unwanted advances; do not share has shocking material; do not spam members or the plan</li> </ol>	epicting attempt do not ons or tent; do vourself; n sexual rmful or
Measure 22.4	This measure is aimed specifically at "providers of trustworth	iness This measure is aimed specifically at "providers of trustworthiness
QRE 22.4.1	indicators" and is therefore not relevant or pertinent to Micro	osoft indicators" and is therefore not relevant or pertinent to Microsoft and its
	and its services.	services.
SLI 22.4.1 – actions		
enforcing policies above		
Measure 22.5	This measure is aimed specifically at "providers of trustworth	iness This measure is aimed specifically at "providers of trustworthiness
QRE 22.5.1	indicators" and is therefore not relevant or pertinent to Micro	
	and its services.	services.
SLI 22.5.1 – actions		
enforcing policies above		
SLI 22.5.2 – actions		
enforcing policies		
above		

Measure 22.6  QRE 22.6.1  SLI 22.6.1 – actions enforcing policies above	This measure is aimed specifically at "providers of trustworthiness indicators" and is therefore not relevant or pertinent to Microsoft and its services.	This measure is aimed specifically at "providers of trustworthiness indicators" and is therefore not relevant or pertinent to Microsoft and its services
Measure 22.7	LinkedIn	Bing Search
QRE 22.7.1	evolve and adapt our systems and practices for combating	In addition to broader measures described in this report, Bing Search has taken special care to address low authority information and misinformation in relation to elections, the Russian invasion of Ukraine, the Israel-Hamas conflict, and EU elections as detailed below and further in the Crisis Reporting appendices.
	members agree to abide by on joining LinkedIn, prohibit misinformation. As described in more detail in our response to QRE 18.1.1, LinkedIn uses a combination of	Microsoft is also an active participant in the elections working group established by the Crisis Response Working Group. In addition, Microsoft works with election authorities responsible for running elections to promote trusted information regarding elections and monitors for foreign information operations targeting elections. Bing has launched special features such as info panels and specialized answers directing users to high authority content concerning elections and voting (see below example for France's "snap" parliamentary election).
	LinkedIn also aims to educate its members about civic discourse, electoral processes, and public security through its global team of news editors. These editors provide trustworthy and authoritative content to LinkedIn's member-base, and its content moderation teams closely monitor associated platform conversations in a number of languages.	
	In addition to broader measures, LinkedIn has taken special care to counter low authority information in relation to the Russian Invasion of Ukraine, the Israel-	

Hamas Conflict and the European Elections as detailed in the Crisis Reporting appendices.

For example, during pre-election cycles, LinkedIn relies on trusted and reputable publisher sources for featured shares, focusing on the policy impact on businesses and professionals around the EU. LinkedIn also curate's links to topical landing pages from trusted publishers to provide members with easy and reliable entry points to more detailed coverage. LinkedIn does not compete with trusted publishers for speed or depth of coverage, but instead aims to connect their existing coverage to LinkedIn members and their needs. During important events in European elections, this team provides manually curated and localised storylines.



Additional detail is provided in the Crisis Reporting appendix.

In response to Russia's invasion of Ukraine in 2022, Bing Search has closely monitored low authority information trend and is working to promote authoritative content related to the conflict.

- Bing Search has taken steps to algorithmically boost authority signals and has
  downgraded less authoritative information (see SLI 22.7.1). These queries are
  translated automatically into other languages supported by Bing Search and
  integrated into Bing's generative AI experiences.
- Bing search works with Microsoft's Democracy Forward, Threat Assessment Center (MTAC) and Threat Intelligence Center (MSTIC) to ensure access to signals regarding Russian cyber and information operations targeting Ukraine to inform potential algorithmic interventions both for traditional and generative AI search tools.
- Bing Search regularly partners with independent research organizations and nonprofit organizations to maintain threat intelligence and inform potential algorithmic interventions both for traditional and generative AI search tools.

					<ul> <li>Bing Search also takes action to remove autosuggest and related search terr have been found likely to lead users to low authority content. These me have helped ensure that Bing Search is promoting authoritative news so timelines, and other factual information at the top of algorithmic search resu in Bing generative AI experiences.</li> <li>Bing Search has also complied with EU sanctions orders requiring the removeration Russian media sources, such as Russia Today and Sputnik.</li> </ul>			thoritative news sources, orithmic search results and requiring the removal of
<b>SLI 22.7.1 - actions</b>	Methodology	of data mea	asurement:		Methodology of data me	asurement:		
enforcing policies								
above			le metrics to	report during this	_	•	•	with respect to the metrics
			<ul> <li>Member State), Bing has</li> <li>"Defensive Integration by users that we Ukraine/Russia of "Impressions (searched by users that we will be the searched by th</li></ul>	ch actions are taken at endeavored to providerventions (RU/UA)" ere addressed with dorisis during the Report RU/UA)" reflects the users where defensions were applied durant Impressions	a global level (and e the additional for refers to the total refersive search intring Period. e number of user ve search interving the Reporting	impressions for queries entered impressions for queries entions related to the Period.  Shares		
Member States						(RU/UA)	(N/A)	(N/A)
Austria					3,453	47,947		
Belgium					5,014	65,142		
Bulgaria					11	22		
Croatia					2	2		
Cyprus					0	0		
Czech Republic					23	28		
Denmark					1,660	12,233		

Estonia	5	5	
Finland	1,496	10,619	
France	11,724	286,787	
Germany	14,319	60,1938	
Greece	6	7	
Hungary	4	4	
Ireland	3,587	33,749	
Italy	6,832	122,340	
Latvia	11	14	
Lithuania	3	3	
Luxembourg	0	0	
Malta	2	2	
Netherlands	61,22	53,143	
Poland	6,028	91,154	
Portugal	3,410	26,600	
Romania	4	5	
Slovakia	5	5	
Slovenia	0	0	
Spain	11237	313,141	
Sweden	4696	35,766	
Iceland	0	0	
Liechtenstein	0	0	
Norway	2,988	31,233	
Total EU	79,654	1,700,656	
Total EEA	82,642	1,731,889	

## V. Empowering users

# Commitment 23

Relevant Signatories commit to provide users with the functionality to flag harmful false and/or misleading information that violates Signatories policies or terms of service.

	C.23	M 23.1	M 23.2
We signed up to the following	LinkedIn	LinkedIn	LinkedIn
measures of this commitment:	Bing Search	Bing Search	Bing Search

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	No	No
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable	Not applicable.
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	No	No
If yes, which further implementation measures do you plan to put in place in the next 6	Planned Implementation Measures	Planned Implementation Measures
months?	Not applicable.	Bing monitors user feedback and regularly evolves its product reporting process and forms in response to user feedback, new legal obligations, or product developments.

Measure 23.1 LinkedIn	Bing Search
If LinkedIn users locate content they believe violates our Professional Community Policies, we encourage them to report it using the inproduct reporting mechanism represented by the three dots in the upper right-hand corner of the content itself on LinkedIn.  Misinformation is specifically called out as one of the reporting options.  The reporting feature is available through, and largely identical across, LinkedIn's website and mobile app, although reporting reasons and their visual presentation may vary slightly for certain types of content. In most instances, the reporting process is located just one click away from the content being reported and, depending on whether content is reported in the LinkedIn App or on desktop, the reporting process takes between four or five clicks to complete.  Reported content generally is reviewed by trained content reviewers. In addition, LinkedIn uses automation to flag potentially violative content to our content moderation teams. If reported or flagged content violates the Professional Community Policies, it will be	As a search engine that does not host or display user generated content, Bing Search does not have a reporting function for user generated content.  Bing Search's Report a Concern Form permits users to report third-party websites for a variety of reasons including disclosure of private information, spam and malicious pages, and illegal materials.  Bing Search's "Feedback" tool, which is accessible on the lower right corner on a search results page, allows users to provide feedback on search results (including a screenshot of the results page) to Bing Search. Depending on the nature of the feedback, Bing Search may take appropriate action, such as to engage in algorithmic interventions to ensure high authority content appears above low authority content in search results, remove links that violate local law or Bing policies, add answers, warnings or other media literacy interventions on certain topics, or remove autosuggest terms.  As discussed in QRE 14.1.2, these tools have also been updated to make it easy for users to report problematic content they encounter in Bing's generative Al experiences by including the same "Feedback" button with direct links to the respective service's "Report a Concern" tool on the footer of each page

	Members also receive an email notifying them in in the event their content actioned in accordance with our policies. The email includes a link to a notice page for additional details and resources. If the member believes that their content complies with our Professional Community Policies, they can ask us to revisit our decision by submitting an appeal by clicking on the link in the notice page.  Further, LinkedIn has a dedicated process for those entities who have been awarded Trusted Flagger status in accordance with Article 22 of the Digital Services Act.	
Measure 23.2	LinkedIn	Bing Search
QRE 23.2.1	As noted in our response to QRE 23.1.1, content that is flagged as misinformation (whether reported or automatically detected) is removed from LinkedIn. LinkedIn has a quality assurance team that is dedicated to ensure the quality of our content review processes and decisions. For example, the quality assurance team performs quality checks, on a routine basis, the content moderation decisions that have previously been made. This also allows us to improve our processes and further strengthen our platform as a trusted source of information.	See QRE 23.1.1. Bing Search generally does not experience issues with mass flagging of content or abuse of its reporting features. This concern appears more applicable to other types of services (e.g., social media and online media websites) or content outside the scope of this regulation that is more prone to mass flagging, such as copyright infringement. Bing Search engages in human review of reports submitted through its reporting functionality and evaluates each report consistent with its policies and procedures.
	Furthermore, as a real identity professional network, LinkedIn acts vigilantly to maintain the integrity of all accounts and to ward off bot and false account activity. LinkedIn enforces the policies in its <u>User Agreement</u> prohibiting the use of "bots or other unauthorized automated methods to access the Services, add or download contacts, send or redirect messages, create, comment on, like, share, or re-share posts, or otherwise drive inauthentic engagement" through:	

Maintaining a dedicated Anti-Abuse team to research	
emerging trends and key risks and develop tools to address	
them	
Using AI to detect inauthentic activity and communities of	
fake accounts	
Using automated systems detect and block	
automated activity	
Imposing limits on certain categories of activity commonly	
engaged in by bad actors	
Conducting manual investigation and restriction of accounts	
engaged in automated activity	
Maintaining 24/7 escalation paths to address any emerging	
issues.	

## V. Empowering users

#### Commitment 24

Relevant Signatories commit to inform users whose content or accounts has been subject to enforcement actions (content/accounts labelled, demoted or otherwise enforced on) taken on the basis of violation of policies relevant to this section (as outlined in Measure 18.2), and provide them with the possibility to appeal against the enforcement action at issue and to handle complaints in a timely, diligent, transparent, and objective manner and to reverse the action without undue delay where the complaint is deemed to be founded.

	C.24	M 24.1
We signed up to the following	LinkedIn	LinkedIn
measures of this commitment:		

LinkedIn	Commitment 24 is not relevant or
	pertinent to Bing Search as it does

		not allow the posting of user content that would require user appeals
In line with this commitment, did you deploy new implementation measures (e.g. changes to	No	Choose an item.
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	
	Not applicable	
Do you plan to put further implementation measures in place in the next 6 months to	No	Choose an item.
substantially improve the maturity of the implementation of this commitment? [Yes/No]		
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures	
	Not applicable	

Measure 24.1	LinkedIn	Measure 24.1 is not relevant or pertinent to Bing Search as it does not
		allow the posting of user content that would require user appeals
QRE 24.1.1	When a post, comment, reply, or article, is reported and found to go against	
	our Professional Community Policies, we take appropriate actions to remove	
	it and/or restrict accounts depending on the severity of violation.	
	The author whose content we've actioned or account we've restricted will	
	generally be notified when we take action. Notices are typically sent by email	
	and contain a link to a notice page containing certain additional information	
	(e.g., about the content at issue, the policy violated, the action LinkedIn has	
	taken, redress info and, in most instances, a link to allow the individual to	
	appeal LinkedIn's decision). If the author believes LinkedIn has made a	
	mistake in actioning their content or restricting their account, the member	
	can ask LinkedIn to take a second look by clicking the link to submit an	
	appeal. In order to submit the appeal, the member must confirm that they	
	have read the relevant LinkedIn policy (a link is provided to the relevant	

	and confirm the complies with the member of its ap back up on Linke	y members are treated	he content at issue, views those appeals ppeal is successful, we	they believe it and notifies the put the content	
SLI 24.1.1 - enforcement actions Data	provided)  The table below its platform as M The metrics included  - (1) the between State;  - (2) the the cordinal three cord	reports metrics concellisinformation, pursualide: number of pieces of continumber of those continumber of those appeared in the metrics are assigned from the end of those content removals that were appealed by the content author	erning content LinkedI nt to the policy outline ontent removed as M er 2024, broken out b ent removals that wer eals that were granted peal to appeal decision	n removed from ed in QRE 18.2.1.  isinformation y EEA Member re appealed by  l; n for those State based on	

	- 31 December 2024.			
Member States				
Austria	177	0	0	1.5 hours
Belgium	445	3	1	
Bulgaria	36	0	0	
Croatia	54	3	0	
Cyprus	13	1	1	
Czech Republic	88	1	0	
Denmark	291	2	0	
Estonia	9	0	0	
Finland	52	1	0	
France	3,452	14	1	
Germany	1,639	40	2	
Greece	164	2	0	
Hungary	40	1	0	
Ireland	136	0	0	
Italy	1,264	15	2	
Latvia	7	0	0	
Lithuania	24	2	0	
Luxembourg	62	0	0	
Malta	11	1	0	
Netherlands	3,308	38	5	
Poland	128	2	0	
Portugal	189	5	1	
Romania	151	3	0	
Slovakia	8	0	0	
Slovenia	8	0	0	
Spain	640	6	1	
Sweden	209	1	0	

Iceland	6	0	0
Liechtenstein	0	0	0
Norway	99	2	0
Total EU	12,605	142	14
Total EEA	12,710	144	14

## V. Empowering users

## Commitment 25

In order to help users of private messaging services to identify possible disinformation disseminated through such services, Relevant Signatories that provide messaging applications commit to continue to build and implement features or initiatives that empower users to think critically about information they receive and help them to determine whether it is accurate, without any weakening of encryption and with due regard to the protection of privacy.

	C.25	M 25.1	M 25.2
We signed up to the following	Commitment 25 is not relevant to Bing Search and LinkedIn.	N/A	N/A
measures of this commitment:			

Commitments 26 - 29

#### Commitment 26

Relevant Signatories commit to provide access, wherever safe and practicable, to continuous, real-time or near real-time, searchable stable access to non-personal data and anonymised, aggregated, or manifestly-made public data for research purposes on Disinformation through automated means such as APIs or other open and accessible technical solutions allowing the analysis of said data.

	C.26	M 26.1	M 26.2	M 26.3
We signed up to the following	LinkedIn	LinkedIn	LinkedIn	LinkedIn
measures of this commitment:	Bing Search	Bing Search	Bing Search	Bing Search

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	Yes	Yes
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Beta program to allow bonafide researchers to access public data for research on impact of misinformation and other online harms impacting the Union.	Bing released a specialized dataset of European Parliament election related queries in different EU languages for use by the research community and to support transparency. Researchers can apply using the form found <a href="https://example.com/here/be/here/">https://example.com/here/here/here/here/here/here/here/her</a>
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	No	Yes
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures	Planned Implementation Measures
	Not applicable.	

Bing is actively exploring additional
mechanisms to meet this
commitment and welcomes
feedback from the research
community and Commission on the
types of data that would be most
useful to the research community.
Bing is working to provide
additional open datasets and
resources that may be used by the
research community.

Measure 26.1	LinkedIn	Bing Search
QRE 26.1.1	LinkedIn supports the aims of the research community and regularly	Bing Search and Microsoft are dedicated to supporting the research community
	provides information and data to the research community in a variety of	and regularly provide information and data to the research community in a
	ways.	variety of ways.
	To date, we have made non-personal, aggregated data publicly available	Bing Search already provides researchers and the public with access to MS
	(data on gender equity in the workplace, data on green skills and jobs, data	MARCO, a collection of datasets focused on deep learning in search that are
	on industry and job skills, and data on engagement with labor markets and	derived from Bing Search queries and related data. Research organizations can
	employment trends). Our goal with this action to enable researchers to	gain access to the MS MARCO datasets instantaneously via the MS MARCO
	understand the rapidly changing world of work through access to and use	homepage. The MS MARCO dataset has been cited in numerous research
	of LinkedIn data. Because much of our data is publicly available, the extent	papers since its release and has been utilized for a range of research issues,
	to which such data has been used for disinformation related research	including in connection with misinformation and disinformation. Because the
	purposes cannot easily be ascertained.	dataset is provided open source, the extent to which it has been used for
		disinformation related research purposes cannot easily be ascertained.
	Additionally, LinkedIn is expanding its API access for public data for	
	disinformation related research purposes. Information about the LinkedIn	Bing Search also provides researchers with access to ORCAS: Open_Resource
	APIs are available to the public and researcher access is provided here.	for Click Analysis in Search   msmarco (microsoft.github.io), a click-based
		dataset associated with the TREC Deep Learning Track, which provides 18
		million connections to 10 million distinct queries and is available to researchers.

Finally, Microsoft is also a leader in research in Responsible AI and provides a range of tools and resources dedicated to promoting responsible usage of artificial intelligence to allow practitioners and researchers to maximize the benefits of AI systems while mitigating harms. For example, as part of its Responsible AI Toolbox, Microsoft provides a Responsible AI Mitigations Library, which enables practitioners to more easily experiment with different techniques for addressing failure (which could include inaccurate outputs), and the Responsible AI Tracker, which uses visualizations to show the effectiveness of the different techniques for more informed decision-making. These tools are available to the public and research community for free.

In 2020, Bing Search also shared <u>a search dataset for Coronavirus Intent</u> comprised of queries from all over the world that had an intent related to the Coronavirus or Covid-19 (e.g., searches for "Coronavirus updates Seattle" or "Shelter in place") for use by researchers and the public. This data, which is divisible by country, is particularly relevant to misinformation research on public health issues and the COVID-19 pandemic, as it provides insights into how users sought information related to the coronavirus during the pandemic. The dataset was also posted to <u>Azure Open datasets</u> for Machine Learning, <u>Tensorflow.org</u>, and <u>Kaggle</u>. See additional information on the dataset at <u>Extracting Covid-19 insights from Bing Search data | Bing Search Blog</u>.

In 2024, Microsoft publicly released a new information rich dataset, MS MARCO Web Search dataset, leveraging Bing search data. This dataset closely mimics real-world web document and query distribution and provides rich information for various kinds of downstream tasks and encourages research in various areas, It also contains rich information from the web pages, such as visual representation rendered by web browsers, raw HTML structure, clean text, semantic annotations, language and topic tags labeled by industry document understanding systems, etc. MS MARCO Web Search further contains 10 million unique queries from 93 languages with millions of relevant labeled query-document pairs collected from the search log of the Microsoft Bing search engine to serve as the query set.

Additionally, researchers who are registered webmasters may utilize Bing Search's Keyword Tools and Backlinks Webmaster Tools to provide insights into search usage and keywords. Bing is also working on ways to provide deeper research access to the tool across the research community and hopes to provide updates in its next report.

Bing Search also offers use of <u>Bing APIs</u> to the public, which include Bing Image Search, Bing News Search, Bing Video Search, Bing Visual Search, Bing Web

Search, Bing Entity Search, Bing Autosuggest, and Bing Spell Check. Bing Search provides free access to these APIs for up to 1,000 transactions per month, which may be leveraged by the research community.

In addition to the above datasets, Microsoft Research maintains a public portal of codes, APIs, software development kits, and datasets that are available to the Research Community at Research tools: code & datasets - Microsoft Research. These public research tools can be accessed by researchers and downloaded instantaneously without formal applications or login credentials.

Bing launched a <u>Qualified Researcher Program</u> to enable EU researchers to easily request access for publicly accessible Bing data from a singular landing page. However, because these datasets are already available open-source (see below), we expect some researchers may elect to obtain datasets via the above means to avoid the burden of an application and credentialing process.

Bing compiled a specialized dataset of European Parliament election related queries in different EU languages for use by the research community and to support transparency; researchers can apply using the form found <a href="here">here</a> Additionally, Bing has engaged with European researchers to discuss the types of data that will be most useful to the research community.

Microsoft is also a leader in research in Responsible AI and provides <u>a range of tools and resources</u> dedicated to promoting responsible usage of artificial intelligence to allow practitioners and researchers to maximize the benefits of AI systems while mitigating harms.

Lastly, given the open nature of the Bing Search index and public nature of search results, researchers can utilize Bing Search or Bing's generative Al experiences to run specific queries and analyze results (unlike social media which may require private accounts or connections between users to access certain materials).

QRE 26.1.2	LinkedIn <u>published</u> information on it researcher access to public data.	s [Beta] Researcher Access Program	Bing Search will publish information as it continues to build further data research infrastructure pertinent to these commitments.		
	Methodology of data measurement:		Methodology of data measurement:		
SLI 26.1.1 -	LinkedIn will publish information as program pertinent to these commitr	it continues to build its data research ments.	of Practice and were provid	d tools discussed in QRE 26.1.2 predate the Code ed open source without tracking mechanisms, oping improved usage tracking for these publicly d datasets.	
uptake of the tools and processes described in Measure 26.1	Nr of users of public access  0 applications were approved under our Beta Art 40 process in the period covered by this report.  Note: Unknown number of researchers who use our broadly available service to conduct research.	Other quantitative information on public access	Nr of users of public access	Other quantitative information on public access	
Data					
Measure 26.2	LinkedIn		Bing Search		
QRE 26.2.1	See QRE 26.1.1		or other personal data provided However, Bing does enable real anumber of mechanisms,	Bing Search does not have private user accounts ded by users as contemplated by Measure 26.2. esearcher access to data on the platform through as described in QRE 26.1.1 and the research RE 18.3.1. Researchers can also submit real-time opilot.	
QRE 26.2.2	See QRE 26.1.1		See QRE 26.2.1 and 26.1.1.		

Access to Data: For access to LinkedIn APIs, a researcher needs to submit an <u>application</u>, <u>meet criteria for approval</u> and provide additional information necessary for us to assess their project. APIs including non-public data may be made available for research purposes based on special requests and the ability of the researcher to protect personal data pursuant to GDPR and relevant intellectual property rights. Upon approval, the researcher's application with be provisioned with the relevant APIs. In addition, access is available to anyone who visits the relevant LinkedIn site.

For access to other data, researchers may be provided with datasets and information as part of research inquiries and research partnerships with LinkedIn. Researchers may contact LinkedIn to discuss research opportunities.

**QRE 26.2.3** 

Currently, there is not an application process to access the MS MARCO, ORCAS, MS MARCO Web Search, or Bing Coronavirus Query datasets in their original download locations, as Microsoft intended to allow open and easy access to the public and research community without arduous credentialing or account creation processes. Users may freely access the datasets instantaneously through the MS MARCO and ORCAS websites and MS-MARCO-Web-Search and Bing Coronavirus Query pages on Github. No application or credentialing is required, but unfortunately this open source model makes tracking usage more challenging and requires investment in additional tooling.

For Bing Search's Keyword Research tool, Researchers may add their website (new or existing) to Bing Search Webmaster Tools and can freely use <u>Keyword Research – Bing Webmaster Tools</u> or <u>Backlinks – Bing Webmaster Tools</u>. Bing Search APIs are accessible at <u>Bing APIs</u> and may be accessed by signing up for an account or requesting access through the Qualified Researcher Program discussed below.

For the <u>Bing Qualified Researcher Program</u>, eligible EU researchers may request access for publicly accessible Bing data and APIs, including the resources mentioned above, through an application form. If their request meets the criteria highlighted on the application page, data will be made available for the approved research purpose. More details are available at <u>Bing Qualified Researcher Program - Microsoft Support</u>.

Other Microsoft datasets, including datasets derived by Bing Search, are accessible at Researcher tools: code & datasets - Microsoft Research. These also do not require credentials and datasets may be freely downloaded by researchers.

For other research data, researchers may be provided datasets and information as part of research partnerships with Microsoft Research. Researchers may contact Microsoft Research to discuss research opportunities.

SLI 26.2.1 - meaningful metrics on the uptake, swiftness, and acceptance level of the tools and	LinkedIn h Beta Rese	as provided archer Acces	ss Program i	ng to the numl n the period applications re	covered by	y this report.	And of course, the Bing Search service, including Bing's generative AI experiences, are also public and may be used for a variety of research purposes without login or credentials.  Microsoft is continuing to explore possibilities to streamline data access consistent with this provision and in accordance with Microsoft Research's longstanding data sharing and collaboration with the research community. Bing also regularly explores additional research partnerships  Methodology of data measurement:  Bing does not gate access for most of its datasets and therefore this metric is inapplicable, as any individual may freely access the tools. Bing is working on approaches for better tracking of usage of publicly released datasets and APIs.  Bing tracks applications to its Qualified Researcher Program and will provide additional reporting in its next report.  "MSMARCO" under "Other Metrics" provides the total global number of downloads of the MS Marco database
processes in Measure 26.2	No of monthly users	No of applications	No of applications	No of application s accepted	Averag e respons e time	Other metrics	Other metrics  MSMARCO
Data		<b>52</b>	47	0	e time		8181
Measure 26.3	LinkedIn						Bing Search
QRE 26.3.1	LinkedIn provides a comprehensive Help Center for assistance with other matters. LinkedIn endeavors to restore access and address any issues expeditiously.						Users can report issues accessing MS MARCO and ORCAS datasets to <a href="ms-marco@microsoft.com">ms-marco@microsoft.com</a> . Microsoft endeavors to restore access and address any issues with dataset access expeditiously.

For Bing Search's Keyword Research tool, users can report issues by creating a support request ticket at Webmaster Support - Bing Webmaster Tools.
Users may report issues with Bing API access at <a href="https://aka.ms/bingapisupport">https://aka.ms/bingapisupport</a> .

#### Commitment 27

Relevant Signatories commit to provide vetted researchers with access to data necessary to undertake research on Disinformation by developing, funding, and cooperating with an independent, third-party body that can vet researchers and research proposals.

	C.27	M 27.1	M 27.2	M 27.3	M 27.4
We signed up to the	LinkedIn	LinkedIn	LinkedIn	LinkedIn	LinkedIn
following measures of	Bing Search				
this commitment:					

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to	Yes	Yes
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Microsoft was an active participant	Microsoft was an active participant
	in the EDMO Working Group for	in the EDMO Working Group for
	the Creation of an Independent	the Creation of an Independent
	Intermediary Body to Support	Intermediary Body to Support
	Research on Digital Platforms.	Research on Digital Platforms.
Do you plan to put further implementation measures in place in the next 6 months to	No	No
substantially improve the maturity of the implementation of this commitment? [Yes/No]		

If yes, which further implementation measures do you plan to put in place in the next 6	Planned Implementation Measures	Planned Implementation Measures
months?		
	Not applicable.	Not applicable.

Measure 27.1	LinkedIn	Bing Search
QRE 27.1.1	Microsoft has been a member of the Working Group for the Creation	Microsoft supports the development of an independent third-party body, in
	of an Independent Intermediary Body to Support Research on Digital	line with the Digital Services Act, and the upcoming associated Delegated
	Platforms. The Working Group started its work on 10 May 2023 under	Regulation on data access provided for in the Digital Services Act. Microsoft
	the coordination of the European Digital Media Observatory (EDMO).	has also been a member of the Working Group for the Creation of an
	Its main task has been to develop an organizational model for a new	Independent Intermediary Body to Support Research on Digital Platforms.
	independent intermediary body that will facilitate data sharing	The Working Group started its work on 10 May 2023 under the coordination
	between digital platforms and independent, external researchers.	of the European Digital Media Observatory (EDMO). Its main task has been
		to develop an organizational model for a new independent intermediary
		body that will facilitate data sharing between digital platforms and
		independent, external researchers.
Measure 27.2	LinkedIn	Bing Search
	As the development of the independent third-party body has not yet	As the development of the independent third-party body has not yet been
QRE 27.2.1	been finalized, there was no funding allocated to the implementation	finalized, there was no funding allocated to the implementation of Measure
	of Measure 27.2 during the period covered by this report.	27.2 during the period covered by this report.
Measure 27.3	LinkedIn	Bing Search
	As the development of the independent third-party body has not yet	As the development of the independent third-party body has not yet been
ORE 27.3.1	been finalized, no data was shared with this body for the purposes of	finalized, no data was shared with this body for the purposes of research as
QRE 27.3.1	research as outlined under Measure 27.3 during the period covered	outlined under Measure 27.3 during the period covered by this report.
	by this report.	
	Methodology of data measurement:	Methodology of data measurement:
SLI 27.3.1 – research		
projects vetted by the	As the development of the independent third-party body has not yet	As the development of the independent third-party body has not yet been
independent third-	been finalized, no research projects were vetted by this body, as set	finalized, no research projects were vetted by this body, as set out under
party body	out under Measure 27.3, during the period covered by this report.	Measure 27.3, during the period covered by this report.

	Nr of research projects for which they provided access to data	Nr of research projects for which they provided access to data
	Not applicable.	Not applicable.
Data		
Measure 27.4	LinkedIn	Bing Search
QRE 27.4.1	Microsoft is a leader in research in Responsible AI and provides a range of tools and resources dedicated to promoting responsible usage of artificial intelligence to allow practitioners and researchers to maximize the benefits of AI systems while mitigating harms. For example, as part of its Responsible AI Toolbox, Microsoft provides a mitigations library, which enables practitioners to experiment with different techniques to address the failure of AI systems (which could include the production of inaccurate outputs). We also provide the Responsible AI tracker, which uses visualizations to show the effectiveness of the different techniques for more informed decision-making. These tools are available to the public and research community for free.  These are just a few of the examples of partnerships Microsoft forged with third parties to combat the creation and dissemination of deceptive AI-generated content targeted at our elections. Microsoft teams regularly engage with external stakeholders on these issues to inform our internal policies, practices, and standards, to improve our products, and to understand emerging threats.	Microsoft is working with leading academics and researchers to help us better detect, understand, and mitigate the risks to elections posed by deceptive media generated by Al. For instance, Bing worked with Princeton University to address the question of how to build scalable measurement techniques to evaluate deceptive Al in images.  More broadly, Microsoft is a leader in research in Responsible Al and provides a range of tools and resources dedicated to promoting responsible usage of artificial intelligence to allow practitioners and researchers to maximize the benefits of Al systems while mitigating harms. For example, as part of its Responsible Al Toolbox, Microsoft provides a mitigations library, which enables practitioners to experiment with different techniques to address the failure of Al systems (which could include the production of inaccurate outputs). We also provide the Responsible Al tracker, which uses visualizations to show the effectiveness of the different techniques for more informed decision-making. These tools are available to the public and research community for free.  These are just a few of the examples of partnerships Microsoft forged with third parties to combat the creation and dissemination of deceptive Algenerated content targeted at our elections. Microsoft teams regularly engage with external stakeholders on these issues to inform our internal policies, practices, and standards, to improve our products, and to understand emerging threats.

#### Commitment 28

Relevant Signatories commit to support good faith research into Disinformation that involves their services.

	C.28	M 28.1	M 28.2	M 28.3	M 28.4
We signed up to the following	LinkedIn	LinkedIn	LinkedIn	LinkedIn	LinkedIn
measures of this commitment:	Bing Search				

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to	Yes	Yes
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Published details on our [Beta]	Microsoft and IE University's Center
	Researcher Access Program	for the Governance of Change in
		Spain collaborate on <u>Al4Democracy</u>
		to create knowledge and promote
		action for a responsible use of
		artificial intelligence to defend and
		strengthen democracy. Launched in
		November 2023, Al4Democracy is
		ongoing and the continuation of
		the Tech4Democracy program, an
		initiative led by IE University in
		partnership with the United States
		Department of State and with the
		strategic support of Microsoft.

Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	Yes	Yes
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures  Ongoing review of researcher feedback and needs may result in additional measures and resources being made available.  Update our program in light of regulatory guidance that may be provided pursuant to Art. 40 of the DSA, including the upcoming	Planned Implementation Measures  Ongoing review of researcher feedback and requests may result in additional measures and resources.  In addition, Microsoft Research regularly explores potential partnerships with third party research institutions and is actively in discussions with several research
	delegated act on access to online platform data for vetted researchers.	institutions on potential misinformation and disinformation related research that may leverage Bing Search data. Microsoft's internal research divisions also regularly initiate and support research relevant to misinformation and disinformation.

Measure 28.1	LinkedIn	Bing Search
QRE 28.1.1	LinkedIn facilitates research, engages with the research community,	Bing Search facilitates research, engages with the research community, and
	and provides data to the research community in a variety of ways, as	provides data to the research community in a variety of ways, as described
	described below and in QRE 26.1-2.	below and in QRE 26.1-2 and 18.3.1.
	Historically, LinkedIn's work with external stakeholders, including, for	More broadly, Microsoft dedicates significant resources to supporting,
	example, research institutes, and academia, to understand the	promoting, and developing research on emerging issues including
	rapidly changing world of work through access to and use of	responsible AI, safe design, search and information retrieval, language

LinkedIn data. Additionally, LinkedIn employs academics to gain practical experience combining industry knowledge with academic expertise to solve complex business problems spanning all areas of engineering, with an initial focus on artificial intelligence (including work related to large recommender systems and deep learning algorithms) and data science.

While the foregoing work remains critical to our mission, we are working to expand access to data for research purposes consistent with the goals of the CoP as well as the applicable requirements of the DSA and look forward to providing further information on this in future reports.

Additionally, LinkedIn regularly explores potential partnerships with non-governmental and research institutions and is actively in discussions with one research institution to conduct a data and recommender system pilot project leveraging LinkedIn data. LinkedIn hopes to publicly announce this partnership in its next report.

Finally, LinkedIn has in place the needed teams and tools to make data available to researchers in a variety of ways, including via Excel or XML files, GitHub repositories, sandboxed laptops, and APIs.

learning models, and algorithms. <u>Microsoft Research</u> and other research groups within the company, such as the <u>Al for Good Research Lab</u>, employ robust teams of researchers and data scientists and regularly utilize Bing Search datasets and web search as part of important research efforts, including research focused on misinformation and/or disinformation.

Microsoft Research and the AI for Good Lab regularly explore potential partnerships with third party research institutions and are actively in discussions with research institutions on potential misinformation and disinformation related research that may leverage Bing Search data. Microsoft also works with Princeton University to increase researcher access to data on cyber enabled influence operations.

Microsoft Research also established the <u>Accelerate Foundation Models Research (AFMR) global network and resource platform</u> to assemble an interdisciplinary research community around solving some of today's greatest technical and societal challenges through aligning Al with shared human goals, values, and preferences; improving human-Al interactions; and accelerating scientific discoveries.

Microsoft is currently undertaking additional research and education on how users interact with content provenance tools and the use of content provenance tools for AI including through its grant with C2PA..

Microsoft Research has also undertaken research related to information integrity and elections in the age of generative Al.

Lastly, Bing Search regularly partners with third party nonprofits and research organizations and NGO partners to review and evaluate emerging trends, techniques, tactics, and threat intelligence in misinformation and/or disinformation and related topics.

Measure 28.2	LinkedIn	Bing Search
QRE 28.2.1	Please see QRE 26.1.1 and QRE 26.2.3.	See QRE 26.2.3 and 26.1.1.
Measure 28.3	LinkedIn	Bing Search
QRE 28.3.1	We look forward to partnering with other relevant signatories on this	We look forward to partnering with other relevant signatories on this project
	project and will provide further reporting as the annual consultation	and will provide further reporting as the annual consultation is established.
	is established.	
Measure 28.4	LinkedIn	Bing Search
QRE 28.4.1	There were no relevant developments during the period covered by	There were no relevant developments during the period covered by this
	this report.	report.

#### 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.

	C.29	M 29.1	M 29.2	M 29.3
We signed up to the following	Commitment 29 is aimed specifically at the research community and is therefore not			
measures of this commitment:	relevant or pertinent to Microsoft and its services.			

Commitments 30 - 33

#### Commitment 30

Relevant Signatories commit to establish a framework for transparent, structured, open, financially sustainable, and non-discriminatory cooperation between them and the EU fact-checking community regarding resources and support made available to fact-checkers

	C.30	M 30.1	М 30.2	М 30.3	M 30.4
We signed up to the following	LinkedIn	LinkedIn	LinkedIn	LinkedIn	LinkedIn
measures of this commitment:	Bing Search				

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to	No	Yes
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable	Bing entered agreements with independent organizations to improve language coverage across EEA Member States and languages.
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	No	No
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures  Not applicable	Planned Implementation Measures  Not applicable

Measure 30.1	LinkedIn	Bing Search
QRE 30.1.1	LinkedIn has entered into a fact-checking arrangement with an external, independent global news agency. This relationship helps our internal content reviewers determine if user generated content	Bing Search supports the schema.org ClaimReview fact-check protocol as part of its search ingestion, as discussed further in QRE 21.1.1.
	violates LinkedIn's policy on false and misleading content.	In addition to organic fact checks and fact check content leveraging ClaimReview tags that may surface in search results, articles from news and fact checking organizations may appear as part of specialized Bing Answers. In addition, news and fact-check articles can appear in Bing News carousels, which are often presented at the top of search results pages, depending on the nature of the user query. Microsoft maintains agreements with news publishers to surface high authority content, including articles from well-regarded fact checking organizations and journalist-driven fact-checks, high in relevant search results.
QRE 30.1.2	Reuters, a global news organization with 2,500 journalists in about 200 locations worldwide. Reuters is one of the largest news agencies in the world.	See QRE 30.1.1 and QRE 21.1.1. The trusted third-party partners Bing search leverages provide coverage in several EU languages, such as Bulgarian, Croatian, Czech, Dutch, English, Finnish, French, German, Greek, Hungarian, Polish, Portuguese, Romanian, Slovak, Spanish, and Swedish. In addition to the EU languages enumerated above, contracted fact-checking data also includes coverage of Catalan and Serbian languages.
QRE 30.1.3	LinkedIn has implemented internal processes empowering our hundreds of global internal content reviewers to be able to obtain a fact-check from an external fact-checker partnership. Fact-checker conclusions are reviewed by internal content reviewers to determine whether the content at issue violates LinkedIn's policy on false and misleading content and if so, the content is removed from the platform.	See QREs 30.1.1-2.  As noted above, any authorized fact-checking organization can leverage the ClaimReview protocol to provide fact-checks to Bing Search. Bing Search would welcome additional usage of the ClaimReview protocols in EU Member States and actively partners with third party partners including, news organizations, fact checking organizations and nonprofits in the EU to inform defensive search interventions, threat intelligence, and issue monitoring. Bing has dedicated internal teams that leverage this information to inform product mitigations and defensive search interventions.

	Methodology of data measurement:	Methodology of data measurement:
SLI 30.1.1 - Member States and languages covered by agreements with the fact-checking organisations	LinkedIn receives fact checking services for content in English, Spanish, Portuguese, French, German, Italian, Croatian, Czech, Danish, Dutch, Finnish, Greek, Hungarian, Polish, Swedish, Bulgarian, Latvian, Lithuanian, Maltese, Romanian and Slovak.  LinkedIn sends content to external fact checkers regardless of the location of the member posting the content, the viewers of the content, or the topic at issue. Content that violates LinkedIn's policy on false and misleading content is removed.	As described in QRE 30.1.1, Microsoft has a number of news agreements that include journalism, news, and fact checking coverage and provide remuneration to fact checkers and news organizations for news that is surfaced on Bing. These agreements, the nature of which are confidential, cover a range of languages and markets, including EEA member states. While certain agreements include fact checking coverage, because these arrangements are not strictly for fact-checking services, we do not reflect these agreements in this SLI.  In addition, as set out in QRE 30.1.2 and SLI 31.1.1, any fact-checking organisation can leverage the ClaimReview protocol to embed fact-check tags into their website (thereby adding fact-check tags or flags into indexed results) and there is no limitation in terms of languages and Member States covered. Because ClaimReview is an open protocol available for all websites and search engines to use, Bing does not have agreements with individual fact-checking organisations to tag articles in Claim Review.
	Nr of agreements with fact-checking organisations	Nr of agreements with fact-checking organisations
EU	1	-

Measure 30.2	LinkedIn	Bing Search
QRE 30.2.1	1	Microsoft provides fair compensation and has engaged in arms-length negotiations with news and fact-checking organizations to secure fact checking coverage in the EU, through news partnership arrangements that support Bing news product features, such as specialized answers and news carousels. These partners operate independently and Microsoft agreements respect their editorial independence.

	LinkedIn's policy on false and misleading content and if so, the content is removed from the platform.	
	LinkedIn meets with its fact-checking partner to discuss improvements in process.	As noted above, Bing Search ingests ClaimReview tags embedded in fact-check content posted on websites that are indexed in the Bing Search index.
QRE 30.2.2		Webmasters for fact-checking organizations have self-help tools available as part of Bing Search's <u>Webmaster Tools</u> , that allow them to review website analytics and search effectiveness (including insights into keywords or search queries used in Bing Search to reach their website) for websites containing ClaimReview tags. This dashboard provides website operators with a range of data and analytics that can be used by fact-checking organizations to assess how users found their fact-checked content, website traffic patterns, and the effectiveness of their fact-check tags.
		See QREs 30.1.1-2 for additional information on Bing Search's ClaimReview fact check program.
		Bing has also engaged in conversations with members of the fact-checking community and signatories to solicit feedback on search considerations and fact-checking.
QRE 30.2.3	This QRE is not relevant or pertinent as LinkedIn is not a fact-checking organisation.	This QRE is not applicable to Bing Search, as it is not a fact-checking organization.
Measure 30.3	LinkedIn	Bing Search
QRE 30.3.1	LinkedIn meets with its fact-checking partner to discuss improvements in process.	Bing meets with its fact-checking partner to discuss improvements in process.
Measure 30.4	LinkedIn	Bing Search
QRE 30.4.1	_There were no relevant developments during the period covered by this report_	There were no relevant developments during the period covered by this report.

#### Commitment 31

Relevant Signatories commit to integrate, showcase, or otherwise consistently use fact-checkers' work in their platforms' services, processes, and contents; with full coverage of all Member States and languages.

	C.31	M 31.1	M 31.2	M 31.3	M 31.4
We signed up to the	LinkedIn	LinkedIn	LinkedIn	LinkedIn	LinkedIn
following measures of	Bing Search		Bing Search	Bing Search	Bing Search
this commitment:					

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to	Choose an item.No	No
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	No applicable	Not applicable
Do you plan to put further implementation measures in place in the next 6 months to	No	No
substantially improve the maturity of the implementation of this commitment? [Yes/No]		
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures	Planned Implementation Measures
	Not applicable.	Not applicable

Measure 31.1	LinkedIn	This Measure is not relevant or pertinent to Bing Search as it does not showcase User Generated Content.
Measure 31.2	LinkedIn	Bing Search
QRE 31.1.1	LinkedIn leverages its fact-checker to review user generated content that may violate its Professional Community Policies, which prohibit misinformation. Content that violates LinkedIn's Professional Community Policies is removed from LinkedIn.	Articles from news and fact checking organizations may appear as part of specialized Bing Answers. In addition, news and fact-check articles can appear in Bing News carousels, which are often presented at the top of search results pages, depending on the nature of user query. Microsoft maintains agreements with news publishers to surface high authority content, including articles from well-regarded fact checking organizations and journalist-driven fact-checks, high in relevant search results.
		During the Reporting Period, Bing maintained a fact-checking agreement to provide coverage in the following EU languages: Bulgarian, Croatian, Czech, Dutch, English, Finnish, French, German, Greek, Hungarian, Polish, Portuguese, Romanian, Slovak, Spanish, and Swedish; the fact-checking agreement also includes coverage of Catalan and Serbian languages, among others.
		In addition, Bing uses threat intelligence to inform the Bing algorithm and defensive search measures used for Bing search and Bing's generative search features. Bing works with trusted third-party partners for leads of potential threats, including in EEA member state languages) to inform defensive search strategies for Bing. Bing also utilises the ClaimReview open protocol to ingest fact checks into search results.
		Bing has increased coverage of EEA languages, informing interventions across monitored themes and sources.
		In addition, Bing Search uses ClaimReview tags embedded in websites with fact-checked content to help inform its algorithms (i.e., by leading users to more authoritative sources of information) and to provide useful context and indications of trustworthiness to its users in search results.
		See QREs 21.1.1 and 30.2.1-2.

	Methodology of d	ata measuremen	t:		Methodology of data	a measurement:		
SLI 31.1.1 - use of fact-checks	checkers represents the number of pieces sent to our external fact checkers during the period 1 July – 31 December 2024. See also SLI 21.1.2.			Fact Check URLs ("FC URL") – This represents the number of distinct URLs containing a ClaimReview tag (i.e. fact-check content) that appeared on the first				
	Nr of fact- checked articles published	Reach of fact-checked	Nr of content pieces reviewed by fact-checkers	Other	Nr of fact-checked articles published	Reach of fact- checked (FCI)	Nr of content pieces reviewed by fact-checkers	Other (FC URL)
Member States								
Austria						34,509		4,698
Belgium						60,454		5,999
Bulgaria						2		2
Croatia						1		1
Cyprus						1		1
Czech Republic						1		1
Denmark						13,443		2,519
Estonia						1		1
Finland						9,591		1,629
France						212,276		9,081
Germany						3,968,924		17,342
Greece						1		1
Hungary						3		3
Ireland						38,151		5,806

Slovakia					1		1
					1 0		1 0
Slovenia					0		0
Spain					161,600		7,793
Sweden					39,686		5,756
Iceland					6		6
Liechtenstein					1		1
Norway					23,942		4,456
Total EU				N/A	4,802,195	N/A	84,790
Total EEA				N/A	4,826,144	N/A	89,253
Total Global	0	N/A	106			•	

	Methodology of data measurement:			Methodology of data measurement:			
SLI 31.1.2 - impact of	Not applicable as LinkedIn removes, rather than labels, content that violates our policy on <u>false and misleading content</u> .			Bing Search is not able to provide metrics concerning the "impact" of individual fact check websites appearing in its search results in response to specific queries.			
actions taken	Nr of pieces of	Impact of said	Other	Nr of pieces of content	Impact of said	Other	
	content labelled	measures on user		labelled	measures on user		
		interactions with		interactions with			
	information labelled			information labelled as			
					false or misleading		

		as false or			
		misleading			
Total EEA	0	Not applicable	Not applicable	Not applicable	

SLI 31.1.3 –	Methodology of data measurement:	Methodology of data measurement:
Quantitative	Not applicable.	Not applicable.
information used for contextualisation for	Denominator to be decided within the TF ahead of the baseline	Denominator to be decided within the TF ahead of the baseline report
the SLIs 31.1.1 /	report	Not applicable
31.1.2	Not applicable	
Total EEA	Not applicable	Not applicable

Measure 31.3	LinkedIn	Bing Search
QRE 31.3.1	There were no discussions in the relevant Subgroup of the	There were no discussions in the relevant Subgroup of the Permanent Task-
	Permanent Task-force on the development of the repository of	force on the development of the repository of fact-checking content during
	fact-checking content during the period covered by this report.	the period covered by this report.
Measure 31.4	LinkedIn	Bing Search
QRE 31.4.1	There were no discussions in the relevant Subgroup of the	There were no discussions in the relevant Subgroup of the Permanent Task-
	Permanent Task-force on the development of the repository of	force on the development of the repository of fact-checking content during
	fact-checking content during the period covered by this report.	the period covered by this report.

#### Commitment 32

Relevant Signatories commit to provide fact-checkers with prompt, and whenever possible automated, access to information that is pertinent to help them to maximise the quality and impact of fact-checking, as defined in a framework to be designed in coordination with EDMO and an elected body representative of the independent European fact-checking organisations.

	C.32	M 32.1	M 32.2	M 32.3
We signed up to the following	LinkedIn	LinkedIn	LinkedIn	LinkedIn
measures of this commitment:	Bing Search	Bing Search		Bing Search

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to	No	No
your terms of service, new tools, new policies, etc)? [Yes/No]		
If yes, list these implementation measures here [short bullet points].	New Implementation Measures	New Implementation Measures
	Not applicable	Not applicable
Do you plan to put further implementation measures in place in the next 6 months to	No	No
substantially improve the maturity of the implementation of this commitment? [Yes/No]		
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures	Planned Implementation Measures
	Not applicable	Not applicable

Measure 32.1	LinkedIn		Bing Search		
Measure 32.2	LinkedIn		This Measure is not relevant to Bing Search as it does not showcase User Generated Content.		
QRE 32.1.1	and LinkedIn will remove policy- with its fact-checking partners (if r checking partners with live links to	ry Policies prohibit misinformation, violating content, after consulting needed). LinkedIn provides its factocontent, which allows partners to entent was thereafter removed by			
SLI 32.1.1 - use of the interfaces and other	Methodology of data measurement:		Methodology of data measurement:  See SLI 31.1.1.		
tools	Monthly users	Other	Monthly users	Other	
Total EEA	Not applicable.				
Measure 32.3	LinkedIn		Bing Search		
QRE 32.3.1	LinkedIn currently uses the Code's Task-force, in particular the Crisis Response and Empowerment of Fact-checkers subgroups, as a channel of communication with the fact-checking community represented by the signatories to the Code.		s Bing Search currently uses the Code's Task-force, in particular the C a Response and Empowerment of Fact-checkers subgroups, as a channe		

#### Commitment 33

Relevant Signatories (i.e. fact-checking organisations) commit to operate on the basis of strict ethical and transparency rules, and to protect their independence.

C.33	M 33.1

We signed up to the	Commitment 33 is aimed specifically at fact-checking organisations and therefore not relevant or pertinent to	N/A
following measures of	Microsoft and its services.	
this commitment:		

# VIII. Transparency Centre

Commitments 34 - 36

# **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	
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	No
If yes, list these implementation measures here [short bullet points].	Not applicable
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	Yes
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures  Microsoft is committed to the proper functioning of the Transparency Center website and will therefore continue its engagement in the Transparency Center subgroup in order to assess the necessity of technical adjustments and new actions to improve the website. Microsoft will thereby contribute to, where necessary, making the website more user-friendly and easily accessible for users ahead of the next reporting period.
Measure 34.1	Microsoft Corporation
Measure 34.2	Microsoft Corporation
Measure 34.3	Microsoft Corporation
Measure 34.4	Microsoft Corporation
Measure 34.5	Microsoft Corporation

#### **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.

In line with this commitment, did you deploy new	Yes
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here [short bullet points].	New implementation Measures
	Microsoft will upload its March 2025 Report to the Transparency Centre website in a timely manner, which
	includes clear and simple information on the new or existing policies and actions that each service has
	implemented based on our Subscription document that is applicable to this reporting period.
Do you plan to put further implementation measures in place	Yes
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures
	Within the context of the work of the Transparency Center subgroup, Microsoft will assess the necessity of
	technical adjustments and contribute to actions where necessary, that are aimed at making the website more user-friendly and easily accessible for users ahead of the next reporting period.

Measure 35.1	Microsoft Corporation
Measure 35.2	Microsoft Corporation
Measure 35.3	Microsoft Corporation
Measure 35.4	Microsoft Corporation
Measure 35.5	Microsoft Corporation
Measure 35.6	Microsoft Corporation

VIII. Transparency Centre	
Commitment 36	
Signatories commit to updating the releval	nt information contained in the Transparency Centre in a timely and complete manner.
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of	Yes
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here [short bullet points].	New implementation Measures
	By uploading this report, Microsoft updated the Transparency Centre with relevant information related to its new policies and implementation actions.
Do you plan to put further implementation measures in place	Yes
in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	Microsoft is committed to providing regular updates as set out under Measures 36.1, 36.2 and 36.3.

Measure 36.1	Microsoft Corporation
Measure 36.2	Microsoft Corporation
Measure 36.3	Microsoft Corporation
QRE 36.1.1 (for the Commitments 34-36)	The Transparency Centre was successfully launched in February 2023. We continue to upload our report according to the approved deadlines
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	Methodology of data measurement:
Transparency Centre, such as the average monthly visits of the webpage.	Website metrics
Data	Between 1 July 2024 to 31 December 2024, the common Transparency Centre has been visited by 20,255 unique visitors. The Signatories' reports were downloaded 5,626 times by 1,275 unique visitors. More specifically, Microsoft's previous COPD report was downloaded 153 times by 82 unique users.

# IX. Permanent Task-Force

Commitment 37

#### **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.

In line with this commitment, did you deploy new	Yes
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here [short bullet	New implementation Measures
points].	
	Microsoft has actively engaged in and contributed to the work of the Task-force and relevant Subgroups and
	Working Groups that were active during the reporting period.
Do you plan to put further implementation measures in place	Yes
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	
	Microsoft is committed to continuing its active engagement in and contribution to the Task-force and service
	relevant Subgroups and Working Groups in the upcoming six-month period.

Measure 37.1	Microsoft Corporation
Measure 37.2	Microsoft Corporation
Measure 37.3	Microsoft Corporation
Measure 37.4	Microsoft Corporation
Measure 37.5	Microsoft Corporation
Measure 37.6	Microsoft Corporation
QRE 37.6.1	Microsoft has actively engaged in and contributed to all the Task-force Plenary meetings as well as to the meetings of all Subgroups and Working Groups active in the current reporting cycle under the Task-force.  As part of each Subgroup and Working Group that has taken place during the reporting period, Microsoft has actively contributed to the development of the deliverables that were collectively agreed.  Microsoft has continuously engaged with all Signatories of the Code, offering its perspectives on issues unique to its subscribed services and responding to ad-hoc inquiries related to various actions taken by its subscribed services. Microsoft appreciates the added value and insights that the Task-Force has created for each Signatory individually as well as the collective community of Signatories. Microsoft looks forward to continue its constructive cooperation within the Code of Practice's governance framework as relevant.

Commitment 38 - 44

# 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.

Yes
New implementation Measures
A dedicated cross-company team continues to ensure proper tracking and compliance with the Code of Practice across all applicable geographical areas, consisting of relevant product members from all subscribed services, attorneys, members of the European Government Affairs team and Democracy Forward Team. Budget items from across Microsoft teams have been used to ensure compliance including ongoing investment in trusted third parties.
No
Planned Implementation Measures
Not applicable
Microsoft Corporation
Microsoft has a dedicated cross-company team to ensure proper tracking and compliance with the Code of
Practice across all applicable geographical areas, consisting of relevant product members from all subscribed
services as well as relevant lawyers, members of the European Government Affairs team and Democracy
Forward Team. In addition, we implemented an internal tracking process that captured all relevant
commitments, responsible entity and persons responsible for compliance with the Code of Practice. Moreover,
regular review of new product features take place to assess potential impacts and compliance under the 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.

In line with this commitment, did you deploy new	No
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here [short bullet	New implementation Measures
points].	
	This Commitment is only relevant for the Baseline Reports, which were provided to the European Commission
	in January 2023.
Do you plan to put further implementation measures in place	No
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	
	Not applicable.

# 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.

In line with this commitment, did you deploy new	No
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	

If yes, list these implementation measures here [short bullet	New implementation Measures
points].	
	Not applicable
Do you plan to put further implementation measures in place	No
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	
	Not applicable
Measure 40.1	Microsoft Corporation
Measure 40.2	Microsoft Corporation
Measure 40.3	Microsoft Corporation
Measure 40.4	Microsoft Corporation
Measure 40.5	Microsoft Corporation
Measure 40.6	Microsoft Corporation

# 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.

In line with this commitment, did you deploy new	Yes
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here [short bullet	New implementation Measures
points].	
	The second report on Structural Indicators by TrustLab was published in September 2024.
Do you plan to put further implementation measures in place	No
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	
	Not applicable.
Measure 41.1	Microsoft Corporation
Measure 41.2	Microsoft Corporation
Measure 41.3	Microsoft Corporation

# 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.

In line with this commitment, did you deploy new	Yes
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here [short bullet	New implementation Measures
points].	
	During the reporting period, Microsoft has been an active participant in and contributor to the Task-force's
	Elections Working Group, in particular in view of elections that took place in the EU as well as in the context
	of ongoing discussions towards an Elections Rapid Response System.
Do you plan to put further implementation measures in place	Yes
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	
	Microsoft will continue its participation in the Task-force's Crisis Response Subgroup and Elections Working
	Group, as relevant.

# Commitment 43

Signatories commit to produce reports and provide data following the harmonised reporting templates and refined methodology for reporting and data disclosure, as agreed in the Task-force.

In line with this commitment, did you deploy new	Yes
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here [short bullet	New implementation Measures
points].	
	Microsoft has provided its March 2025 Report in accordance with the revised Harmonised Reporting Template
	and underlying methodologies as jointly developed by Signatories in the Monitoring and Reporting Subgroup
	under the Code's Task-force.
Do you plan to put further implementation measures in place	Yes
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	
	Microsoft will continue its active engagement in the respective Task-force Subgroups to keep the Harmonised
	Reporting Template and underlying methodologies up to date, where necessary in view of its experience with
	reporting.

# Commitment 44

Relevant Signatories that are providers of Very Large Online Platforms commit, seeking alignment with the DSA, to be audited at their own expense, for their compliance with the commitments undertaken pursuant to this Code. Audits should be performed by organisations, independent from, and without conflict of interest with, the provider of the Very Large Online Platform concerned. Such organisations shall have proven expertise in the area of disinformation, appropriate technical competence and capabilities and have proven objectivity and professional ethics, based in particular on adherence to auditing standards and guidelines.

In line with this commitment, did you deploy new	No
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here [short bullet	New implementation Measures
points].	
	Not applicable.
Do you plan to put further implementation measures in place	No
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	
	Not applicable

# Reporting on the services' response during a period of crisis

# Reporting on the services' response during a crisis

### War of aggression by Russia on Ukraine

Threats observed or anticipated at time of reporting:

**LinkedIn** is an online professional networking site with a real identity requirement, which means that content posted by our members is visible to that member's professional network, including colleagues, managers, and potential future employers. As a result of LinkedIn's professional context, our members do not tend to post misinformation, nor does misinformation content gain traction on LinkedIn. Nonetheless, LinkedIn may be subject to certain members inadvertently posting misinformation during crisis situations.

**Microsoft Advertising**, in its role as an online advertising network, may be subject to the malicious use of its advertising services through either the spreading of misleading or deceptive advertising content or the funneling of advertising revenue to sites spreading disinformation.

**Bing Search** has observed instances of information manipulation with possible actor intent to manipulate search algorithms and lead users to data voids and low-authority content related to the Russia-Ukraine war. Themes included narratives involving Ukrainian immigrants in different countries, specific countries' support to Ukraine (often in the context of local elections) etc.

Mitigations in place at time of reporting:

**Microsoft** has been actively involved in identifying and helping counter Russia's cyber and influence operations aimed against Ukraine. In addition to supporting nonprofits, journalists, and academics within Ukraine, Microsoft's Threat Analysis Center (MTAC) team closely tracks cyber-enabled influence operations. MTAC analysts focused on Europe/Eurasia report on a wide range of Russian influence tactics used to malign or diminish support for Ukraine: propaganda and disinformation published across different languages; people-to-people and party-to-party engagement; real-world provocations; and those that blend cyber and influence activity, like hack-and-leak campaigns. MTAC's work includes analysing the ways these methods are leveraged to target audiences in Central and Eastern Europe.

In June of 2022, Microsoft issued its "<u>Defending Ukraine</u>" report and a follow up report issued in December 2022, both of which detailed the relentless and destructive Russian cyberattacks and influence operations, that we have directly observed in the hybrid war Russia is waging against Ukraine. Microsoft followed those reports with a report in March of 2023, outlining how Russia was regrouping for additional offensive measures against Ukraine including cyber and influence operations and a <u>report</u> in December of 2023 assessing Russian influence and cyber operations, including Russia's anti-Ukraine messaging to Israel and elsewhere. In February of 2024, Microsoft and OpenAl Issued a threat <u>report on activity by adversaries utilizing Al capability</u>. This report identified recent Russian activity including activities targeting Ukraine.

**LinkedIn**'s Professional Community Policies expressly prohibit false and misleading content, including <u>misinformation and disinformation</u>, and its in-house Editorial team provides members with trustworthy content regarding global events, including the war in Ukraine. LinkedIn had approximately 1,443 content moderators globally (for 24/7 coverage), with 180 content moderators located in the EU as of 31 December 2024, and includes specialists in a number of languages including English, German, French, Russian, and Ukrainian. These reviewers use policies and guidance developed by a dedicated content policy team and experienced lawyers, and work with external fact checkers as

needed. When LinkedIn sees content or behaviour that violates its Professional Community Policies, it takes action, including the removal of content or the restriction of an account for repeated abusive behaviour. LinkedIn has been banned in Russia since 2016 and has implemented the European bans on Russian state media. In addition to not operating in Russia, political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue, including the current Russia-Ukraine war. LinkedIn also does not provide a mechanism for content creators to monetise the content they post on LinkedIn.

LinkedIn continues to mature its crisis response processes including 1) quickly coordinating with industry peers regarding the exchange of threat indicators; 2) engaging with external stakeholders regarding trends and TTPs; 3) continuously providing updated policy guidance to internal teams to assist with the removal of misinformation; and 4) continuing to proactively provide localised trustworthy information to our members.

LinkedIn has continued to mature its crisis response playbook by continually monitoring crisis situations globally, expanding internal teams that work on crisis response, and maturing our processes to respond more efficiently and effectively to crisis situations. LinkedIn will continue to follow its processes related to the removal of misinformation, and continually increase investments in resource allocation and process improvements where necessary to respond to the demands of the crisis.

**Bing Search** has implemented the following measures: (1) Defensive search interventions; (2) regular direction of users to high authority, high quality sources as part of search algorithms; (3) removed auto suggest and related search terms considered likely to lead users to low authority content as part of moderation; (4) authority demotion of identified nation state affiliated information manipulation actor domains and (5) partnerships with independent organizations to maintain threat intelligence and inform potential algorithmic interventions. These measures are also integrated into Bing generative AI experiences, along with the additional safeguards discussed at QRE 14.1.1 and QRE 14.1.2 and other measures discussed throughout this report.

[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].

Policies and Terms and Conditions		
Outline any changes to your policies		
Policy	Changes (such as newly introduced policies, edits, adaptation in scope or implementation)	Rationale
LinkedIn		

False or misleading content	LinkedIn continually updates its policies as appropriate during any crisis, including the Ukraine crisis.	Misinformation, disinformation campaigns, coordinated manipulative behaviours, malicious use of advertising products, and the involvement of foreign state actors, are all harms that existed prior to the Ukraine crisis, and therefore LinkedIn already had policies in place to address these harms.
Microsoft Advertising		
N/A	Microsoft Advertising has not implemented changes to its policies or introduced further measures specific to this crisis since the last reporting period.	No changes or new policies or measures were introduced due to the effectiveness of the measures already implemented. Microsoft Advertising is preventing serving advertising related to the Ukrainian crisis pursuant to its Sensitive Advertising Policies. Under this policy, Microsoft Advertising reserves the right to remove or limit advertising in response to a sensitive or high-profile news event to prevent the commercial exploitation of such events and to ensure user safety. Furthermore, our Misleading Content Policies prohibit advertising content that is misleading, deceptive, fraudulent, or that can be harmful to its users, including advertisements spreading disinformation. Microsoft Advertising requires its syndication partners (i.e., those partners that display our advertisements on their services) to abide by strict brand safety-oriented policies to avoid providing revenue streams to websites engaging in misleading, deceptive, harmful, or insensitive behaviours. Our publisher policies include a comprehensive list of prohibited content that ads cannot serve against, including, but not limited to, sensitive political content (e.g., extreme, aggressive, or misleading interpretations of news, events, or individuals), and unsavory content (such as content disparaging individuals or organisations). Partner properties that violate our policies are removed from our network until the partner remedies the issue. Microsoft Advertising banned all advertisements from the media outlets Russia Today (RT) and Sputnik across our ad network and will not place any ads from our ad network on these sites.
Bing Search		
N/A	Bing has not implemented additional policies specific to this crisis since its last report.	Prior to this reporting period, Bing had already established measures to address this crisis. Although Bing continues to refine its approach to addressing this crisis

	and continues to evolve mitigation measures, it has not introduced specific policy changes this reporting period.	
	Scrutiny of Ads Placements	
Outline approaches pertinent to this	chapter, highlighting similarities/commonalities and differences with regular enforcement.	
LinkedIn		
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue.  LinkedIn does not pay its members for creating content, other than in rare instances where we individually select and manage a small group of content creators to create professionally relevant content.  Indication of impact (at beginning of action: expected impact) including relevant metrics when available n/a	
Microsoft Advertising		
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Microsoft Advertising is preventing serving advertising related to the War of aggression by Russia on Ukraine pursuant to its Sensitive Advertising Policies. Under this policy, Microsoft Advertising reserves the right to remove or limit advertising in response to a sensitive or high-profile news event to prevent the commercial exploitation of such events and to ensure user safety. Furthermore, our Misleading Content Policies prohibit advertising content that is misleading, deceptive, fraudulent, or that can be harmful to its users, including advertisements spreading disinformation. Microsoft Advertising requires its syndication partners (i.e., those partners that display our advertisements on their services) to abide by strict brand safety-oriented policies to avoid providing revenue streams to websites engaging in misleading, deceptive, harmful, or insensitive behaviours. Our publisher policies include a comprehensive list of prohibited content that ads cannot serve against, including, but not limited to, sensitive political content (e.g., extreme, aggressive, or misleading interpretations of news, events, or individuals), and unsavory content (such as content disparaging individuals or organisations). Partner properties that violate our policies are removed from our network until the partner remedies the issue.	

	As stated in our revised policies, "We may use a combination of internal signals and trusted third-party data or information sources to reject, block, or take down ads or sites that contain disinformation or send traffic to pages containing disinformation."  Microsoft Advertising partners with third parties as sources for strategic intelligence on domains. Microsoft Advertising actions domains, based in part on these sources evaluations as foreign influence related or non-compliant.  Indication of impact (at beginning of action: expected impact) including relevant metrics when available  During the relevant reporting period, Microsoft Advertising blocked no additional search queries, leaving the total of search queries blocked at 736, and blocked no additional web domains across its network, leaving the total of domains blocked at 2,789.  Microsoft Advertising maintained the suspension placed on all 1,483 existing Russian-based advertisers prior to the relevant reporting		
	period and did not acquire any new Russian-based advertisers during the relevant reporting period.		
	Political Advertising		
Outline approaches pertinent to this ch	apter, highlighting similarities/commonalities and differences with regular enforcement.		
LinkedIn			
Specific Action applied (with reference to the Code's relevant	Description of intervention  Not applicable. Political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue.		
Commitment and Measure)	Indication of impact (at beginning of action: expected impact) including relevant metrics when available n/a		
Microsoft Advertising			
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Not applicable. As described in Section 3 of the report, Microsoft Advertising does not support political advertising.		
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available n/a		

#### **Integrity of Services**

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

#### LinkedIn

# **Specific Action applied** (with reference to the Code's relevant Commitment and Measure)

Description of intervention

LinkedIn's Professional Community Policies prohibit misinformation, and misinformation is removed from the LinkedIn platform.

Members that post misinformation are notified of LinkedIn's removal of their content. Members that repeatedly post misinformation are permanently restricted. State-sponsored attempts to post misinformation, if any, are removed.

LinkedIn also maintains a robust ad-review process to prevent malicious advertising wherein ads related to crises, including the Ukraine war, are manually reviewed and approved by our internal team.

LinkedIn regularly meets with and exchanges information with industry peers to identify and share granular information related to manipulative behaviours, coordinated influence operations, and TTPs. All such content that violates LinkedIn's Professional Community Policies is removed.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

LinkedIn does not track misinformation content removal by subject matter, and a comprehensive listing of its misinformation content takedowns is provided in this disclosure and in its Transparency Report. See also SLI 18.2.1.

Impact metrics for malicious advertising removals are available in SLI 2.1.1 and 2.3.1, whereas metrics related to manipulative behaviors and TTPs are available in SLI 12.1.1 and 14.2.1.

#### **Bing Search**

# **Specific Action applied** (with reference to the Code's relevant Commitment and Measure)

Description of intervention

Bing Search has implemented the following measures: (1) Defensive search interventions; (2) regular direction of users to high authority, high quality sources as part of search algorithms; (3) removed auto suggest and related search terms considered likely to lead users to low authority content as part of moderation; (4) authority demotion of identified nation state affiliated information manipulation actor domains and (5) partnerships with independent organizations for threat intelligence to inform potential algorithmic interventions.

These measures are also integrated into Bing generative AI features, along with the additional safeguards discussed at QRE 14.1.1 and QRE 14.1.2 and other measures discussed throughout this report. Indication of impact (at beginning of action: expected impact) including relevant metrics when available Globally, more than 798,637 queries searched by users related to the Russia-Ukraine war have been treated with defensive search interventions, resulting in over 18.1 million impressions. In the EEA, this resulted in 1,731,889 impressions. For member state level reporting, see SLI 22.7.1. **Empowering Users** Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement. LinkedIn Specific Action applied (with Description of intervention reference to the Code's relevant LinkedIn has an internal team of global news editors that provides trustworthy and authoritative content to its member-base at all Commitment and Measure) times. During important events in the Ukraine crisis, this team provides manually curated and localised storylines. Indication of impact (at beginning of action: expected impact) including relevant metrics when available **Bing Search Specific Action applied** (with Description of intervention reference to the Code's relevant Articles from news and fact checking organizations may also appear as part of specialized Bing Answers. In addition, news and fact-Commitment and Measure) check articles can appear in Bing News carousels, which are often presented at the top of search results pages, depending on the nature of user query. Microsoft maintains agreements with news publishers to surface high authority content, including articles from well-regarded fact checking organizations and journalist-driven fact-checks, high in relevant search results. In addition, Bing uses threat intelligence to inform the Bing algorithm and defensive search measures used for Bing search and Bing's generative search features. Bing works with trusted third-party partners for leads of potential threats (including in EEA member state

	territories and languages) to inform defensive search strategies for Bing. Bing also utilises the ClaimReview open protocol to ingest fact checks into search results.  Bing has increased coverage of EEA languages, informing interventions across monitored themes and sources.  Indication of impact (at beginning of action: expected impact) including relevant metrics when available  See QRE 22.7.1 and QRE 21.1.1 for further information.
	Empowering the Research Community
Outline approaches pertinent to this c	hapter, highlighting similarities/commonalities and differences with regular enforcement.
LinkedIn	
Specific Action applied (with	Description of intervention
reference to the Code's relevant Commitment and Measure)	None for LinkedIn
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available
	None for LinkedIn
Bing Search	
Specific Action applied (with	Description of intervention
reference to the Code's relevant Commitment and Measure)	See QRE 26.1.1 for general research support. Bing Search has not made datasets available pertaining specifically to this crisis.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available
	n/a
Microsoft	
	Description of intervention:

Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Microsoft has provided funding to Report for the World to support reporting positions with trustworthy newsrooms in Ukraine, including Kyiv Independent, ABO, Hromadske and has also invested in the expansion of the Kyiv Independent's War Crimes Investigative Unit to allow for more in-depth reporting. This allows for leveraging authoritative sources of information in the region including by adding the Kyiv Independent our Start platform.  Microsoft <u>published analysis</u> from its Microsoft Threat Analysis Center on how Russian US election interference targets support for Ukraine in April 2024. This election report provides an update on what Microsoft has observed from Russia, Iran, and China and malicious use of AI since our November 2023 report.		
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available		
	n/a		
	Empowering the Fact-Checking Community		
Outline approaches pertinent to this	chapter, highlighting similarities/commonalities and differences with regular enforcement.		
LinkedIn			
LinkedIn  Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  LinkedIn works with globally-recognised factcheckers to receive their independent judgment regarding user-generated content.  Content that violates LinkedIn's policy on false and misleading content is removed.		
Specific Action applied (with reference to the Code's relevant	LinkedIn works with globally-recognised factcheckers to receive their independent judgment regarding user-generated content.		
Specific Action applied (with reference to the Code's relevant	LinkedIn works with globally-recognised factcheckers to receive their independent judgment regarding user-generated content. Content that violates LinkedIn's policy on false and misleading content is removed.  Indication of impact (at beginning of action: expected impact) including relevant metrics when available  LinkedIn does not separately track Ukraine related content sent to external fact checkers. Further detail regarding content sent to fact		

user query. Microsoft maintains agreements with news publishers to surface high authority content, including articles from well-regarded fact checking organizations and journalist-driven fact-checks, high in relevant search results.

In addition, Bing utilizes threat intelligence to inform the Bing algorithm and defensive search measures for Bing search and Bing generative AI features. Bing works with trusted third-party partners for early indicators of potential threats (including in EEA member state languages) that can be leveraged to inform defensive search strategies. Bing also utilises the ClaimReview open protocol to ingest fact checks into search results.

Bing has increased the coverage of EEA member state languages, informing interventions across monitored themes and sources. Generative AI features in Bing are subject to Microsoft's robust safety classifiers (which are informed by data shared by information integrity partners and other authority signals) to prevent the creation of low authority materials or misinformation.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available n/a

# Reporting on the services' response during a crisis

#### Israel-Hamas Conflict

Threats observed or anticipated at time of reporting:

**LinkedIn** is an online professional networking site with a real identity requirement, which means that content posted by our members is visible to that member's professional network, including colleagues, managers, and potential future employers. As a result of LinkedIn's professional context, our members come to LinkedIn for economic opportunity, and as such, do not tend to post misinformation, nor does misinformation content gain traction on LinkedIn. Nonetheless, LinkedIn may be subject to certain members inadvertently posting misinformation during crisis situations.

**Bing Search** has observed instances of data void manipulation to show low-authority content to unsuspecting users related to the Israel-Hamas conflict. This type of search algorithm manipulation could potentially be used as a tactic to spread disinformation. Other themes observed have included foreign influence operations speculating on the evolution of conflict in the area; alleged relations between Ukraine and Hamas; and information manipulation on military operations or the impact of the conflict.

Mitigations in place at time of reporting:

LinkedIn's Professional Community Policies expressly prohibit false and misleading content, including misinformation and disinformation, and its in-house Editorial team provides members with trustworthy content regarding global events, including the Israel-Hamas conflict. LinkedIn had approximately 1,443 content moderators globally (for 24/7 coverage), with 180 content moderators located in the EU as at 31 December 2024, and includes specialists in languages supported on LinkedIn. These reviewers use policies and guidance developed by a dedicated content policy team and experienced lawyers, and work with external fact checkers as needed. When LinkedIn sees content or behaviour that violates its Professional Community Policies, it takes action, including the removal of content or the restriction of an account for repeated abusive behaviour. Political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue, including the current Israel-Hamas conflict. LinkedIn also does not provide a mechanism for content creators to monetise the content they post on LinkedIn.

**LinkedIn** continues to mature its crisis response processes including 1) quickly coordinating with industry peers regarding the exchange of threat indicators; 2) engaging with external stakeholders regarding trends and TTPs; 3) continuously providing updated policy guidance to internal teams to assist with the removal of misinformation; and 4) continuing to proactively provide localised trustworthy information to our members.

LinkedIn has continued to mature its crisis response playbook by continually monitoring crisis situations globally, expanding internal teams that work on crisis response, and maturing our processes to respond more efficiently and effectively to crisis situations. LinkedIn will continue to follow its processes related to the removal of misinformation, and continually increase investments in resource allocation and process improvements where necessary to respond to the demands of the crisis.

**Bing Search**: As part of its regular practices, Bing search employs (1) Defensive search interventions; (2) regular direction of users to high authority, high quality sources as part of search algorithms; (3) removal of auto suggest and related search terms considered likely to lead users to low authority content as part of moderation; (4) authority demotion

of identified nation state affiliated information manipulation actor domains; and (5) partnerships with independent organizations for threat intelligence to inform potential algorithmic interventions. These measures are also integrated into Bing generative AI features, along with the additional safeguards discussed at QRE 14.1.1 and QRE 14.1.2 and other measures discussed throughout this report.

[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].

#### **Policies and Terms and Conditions**

Outline any changes to your policies

Policy	Changes (such as newly introduced policies, edits, adaptation in scope or implementation)	Rationale	
LinkedIn	LinkedIn		
False or misleading content	LinkedIn continually updates its policies as appropriate during any crisis, including the Israel-Hamas conflict.	Misinformation, disinformation campaigns, coordinated manipulative behaviours, malicious use of advertising products, and the involvement of foreign state actors, are all harms that existed prior to the Israel-Hamas conflict, and therefore LinkedIn already had policies in place to address these harms.	

#### **Microsoft Advertising**

Microsoft Advertising has not introduced specific policies related to this crisis, as it considers existing measures discussed throughout this report to sufficiently mitigate risks related to this crisis.

#### **Bing Search**

Bing Search has not introduced specific policies related to this crisis, as it considers existing measures discussed throughout this report to sufficiently mitigate risks related to this crisis.

#### **Scrutiny of Ads Placements**

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

#### LinkedIn

#### **Specific Action applied**

(with reference to the Code's relevant Commitment and Measure)

#### Description of intervention

Political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue, including the current Israel-Hamas conflict. LinkedIn also does not provide a mechanism for content creators to monetise the content they post on LinkedIn.

LinkedIn does not pay its members for creating content, other than in rare instances where we individually select and manage a small group of content creators to create professionally relevant content.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

#### **Microsoft Advertising**

#### Description of intervention

#### Specific Action applied (with reference to the Code's relevant Commitment and Measure)

Microsoft Advertising is preventing serving advertising related to the Israel-Hamas conflict pursuant to its Sensitive Advertising Policies. Under this policy, Microsoft Advertising reserves the right to remove or limit advertising in response to a sensitive or high-profile news event to prevent the commercial exploitation of such events and to ensure user safety. Furthermore, our Misleading Content Policies prohibit advertising content that is misleading, deceptive, fraudulent, or that can be harmful to its users, including advertisements spreading disinformation. Microsoft Advertising requires its syndication partners (i.e., those partners that display our advertisements on their services) to abide by strict brand safety-oriented policies to avoid providing revenue streams to websites engaging in misleading, deceptive, harmful, or insensitive behaviours. Our publisher policies include a comprehensive list of prohibited content that ads cannot serve against, including, but not limited to, sensitive political content (e.g., extreme, aggressive, or misleading interpretations of news, events, or individuals), and unsavory content (such as content disparaging individuals or organisations). Partner properties that violate our policies are removed from our network until the partner remedies the issue.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

During the relevant reporting period, Microsoft Advertising blocked any ads on 36 search queries and blocked 3 web domains across its network.

#### **Political Advertising**

Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.			
LinkedIn	LinkedIn		
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Not applicable. Political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue, including the current Israel-Hamas conflict.  Indication of impact (at beginning of action: expected impact) including relevant metrics when available  n/a		
Microsoft Advertising			
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Not applicable. As described in Section 3 of the report, Microsoft Advertising does not support political advertising.  Indication of impact (at beginning of action: expected impact) including relevant metrics when available  n/a		
	Integrity of Services		
	t to this chapter, highlighting similarities/commonalities and differences with regular enforcement.		
LinkedIn			
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  LinkedIn's Professional Community Policies prohibit misinformation, and misinformation is removed from the LinkedIn platform.  Members that post misinformation are notified of LinkedIn's removal of their content. Members that repeatedly post misinformation are permanently restricted. State-sponsored attempts to post misinformation, if any, are removed.		

LinkedIn also maintains a robust ad-review process to prevent malicious advertising wherein ads related to crises, including the Israel-Hamas conflict, are manually reviewed and approved by our internal team.

LinkedIn regularly meets with and exchanges information with industry peers to identify and share granular information related to manipulative behaviours, coordinated influence operations, and TTPs. All such content that violates LinkedIn's Professional Community Policies is removed.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

Impact metrics for malicious advertising removals are available in SLI 2.1.1 and 2.3.1, whereas metrics related to manipulative behaviors and TTPs are available in SLI 12.1.1 and 14.2.1.

#### **Bing Search**

#### **Specific Action applied**

(with reference to the Code's relevant Commitment and Measure) Description of intervention

Bing Search has not introduced specific practices or policies related to this crisis, as it considers existing measures discussed throughout this report to sufficiently mitigate risks. However, Bing continues to monitor this crisis and may evolve its approach as needed.

As part of its regular practices, Bing Search employs (1) Defensive search interventions; (2) regular direction of users to high authority, high quality sources as part of search algorithms; (3) removal of auto suggest and related search terms considered likely to lead users to low authority content as part of moderation; (4) authority demotion of identified nation state affiliated information manipulation actor domains; and (5) partnerships with independent organizations for threat intelligence to inform potential algorithmic interventions. These measures are also integrated into Bing generative AI features, along with the additional safeguards discussed at QRE 14.1.1 and QRE 14.1.2 and other measures discussed throughout this report.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

n/a

#### **Empowering Users**

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

#### LinkedIn

# Specific Action applied (with reference to the

Description of intervention

Code's relevant	
Commitment and I	Measure)

LinkedIn has an internal team of global news editors that provides trustworthy and authoritative content to its member-base at all times. During important events in the Israel-Hamas conflict, this team provides manually curated and localised storylines.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

#### **Bing Search**

#### **Specific Action applied**

(with reference to the Code's relevant Commitment and Measure)

Description of intervention

Bing Search has not introduced specific practices or policies related to this crisis, as it considers existing measures discussed throughout this report to sufficiently mitigate risks. However, Bing continues to monitor this crisis and may evolve its approach as needed.

Nonetheless, articles from news and fact checking organizations may also appear as part of specialized Bing Answers. In addition, news and fact-check articles can appear in Bing News carousels, which are often presented at the top of search results pages, depending on the nature of user query. Microsoft maintains agreements with news publishers to surface high authority content, including articles from well-regarded fact checking organizations and journalist-driven fact-checks, high in relevant search results.

In addition, Bing utilizes a number of threat intelligence to inform the Bing algorithm and defensive search measures for Bing search and Bing generative Al features. Bing works with trusted third-party partners for leads of potential threats (including in EEA member state languages) that can be leveraged to inform defensive search strategies for Bing. Bing also utilises the ClaimReview open protocol to ingest fact checks into search results.

Bing increased the coverage of EEA member state languages informing interventions across monitored themes and sources.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available n/a

#### **Empowering the Research Community**

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

#### LinkedIn

# Specific Action applied (with reference to the

Description of intervention

Code's relevant Commitment and Measure)	None for LinkedIn		
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available  None for LinkedIn		
Bing Search			
Specific Action applied (with reference to the Code's relevant	Description of intervention  See QRE 26.1.1 for general research support. Bing Search has not made datasets available pertaining specifically to this crisis.		
Commitment and Measure)	Indication of impact (at beginning of action: expected impact) including relevant metrics when available		
	Empowering the Fact-Checking Community		
Outline approaches pertinent	t to this chapter, highlighting similarities/commonalities and differences with regular enforcement.		
LinkedIn			
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  LinkedIn works with globally-recognised factcheckers to receive their independent judgment regarding user-generated content. Content that violates LinkedIn's policy on false and misleading content is removed.		
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available  LinkedIn does not separately track Israel-Hamas conflict related content sent to external fact checkers. Further detail regarding content sent to fact checkers is available at SLI 21.1.1, 30.1.1, and 31.1.1.		
Bing Search			
Specific Action applied (with reference to the	Description of intervention		

# Code's relevant Commitment and Measure)

Bing utilizes threat intelligence to inform the Bing algorithm and defensive search measures for Bing search and Bing generative Al features. Bing works with trusted third-party partners for leads of potential threats (including in EEA member state languages) to inform defensive search strategies for Bing Bing also utilises the ClaimReview open protocol to ingest fact checks into search results.

Bing has increased the overall volume of EEA language coverage, informing interventions across monitored themes and sources.

Generative AI features in Bing are subject to Microsoft's robust safety classifiers (which are informed by data shared by information integrity partners and other authority signals) to prevent the creation of low authority materials or misinformation.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

#### Microsoft

# Specific Action applied

(with reference to thCode's relevant Commitment and Measure)

Description of intervention

Microsoft continues to grow partnerships to strengthen the company's capacity and ability to combat information operations globally.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

Reporting on the services' response during an election

# Reporting on the services' response during an election

### 2024 French Parliamentary Elections

Threats observed during the electoral period:

**LinkedIn** is an online professional networking site with a real identity requirement, which means that content posted by our members is visible to that member's professional network, including colleagues, managers, and potential future employers. As a result of LinkedIn's professional context, our members come to LinkedIn for economic opportunity, and as such, do not tend to post misinformation, nor does misinformation content gain traction on LinkedIn. Nonetheless, LinkedIn may be subject to certain members inadvertently posting misinformation during elections.

**Bing Search** anticipated instances of information manipulation with possible actor intent to manipulate search algorithms and lead users to data voids and low-authority content related to elections. As part of its regular information integrity operations, Bing detected information manipulation themes related to the 2024 French Parliamentary Election, which have been ingested to inform defensive search interventions, along with special How to Vote answer implemented pointing to authoritative sources.

Mitigations in place during the electoral period:

**LinkedIn**'s Professional Community Policies expressly prohibit false and misleading content, including <u>misinformation</u> and <u>disinformation</u>, and its in-house Editorial team provides members with trustworthy content regarding global events, including French elections. LinkedIn had approximately 1,443 content moderators globally (for 24/7) coverage, with 180 content moderators located in the EU as at 31 December 2024, and includes specialists in a number of languages including French. These reviewers use policies and guidance developed by a dedicated content policy team and experienced lawyers, and work with external fact checkers as needed. When LinkedIn sees content or behaviour that violates its Professional Community Policies, it takes action, including the removal of content or the restriction of an account for repeated abusive behaviour.

Political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue, including European Elections. LinkedIn also does not provide a mechanism for content creators to monetise the content they post on LinkedIn.

**LinkedIn** continues to mature its crisis response processes. In addition to the increase in resource allocation and process improvements, best practices include: 1) quickly coordinating with industry peers regarding the exchange of threat indicators; 2) engaging with external stakeholders regarding trends and TTPs; 3) continuously providing updated policy guidance to internal teams to assist with the removal of misinformation; and 4) continuing to proactively provide localised trustworthy information to our members.

LinkedIn has continued to mature its crisis response playbook by continually monitoring crisis situations globally, expanding internal teams that work on crisis response, and maturing our processes to respond more efficiently and effectively to crisis situations. LinkedIn will continue to follow its processes related to the removal of misinformation, and continually increase investments in resource allocation and process improvements where necessary to respond to the demands of the crisis.

LinkedIn also implemented a specialized intake and operations process under the Elections Working Group Rapid Response System for the French Parliamentary elections.

**Bing Search** takes a multifaceted approach to protecting election integrity and regularly updates its processes, policies, and practices to adapt to evolving risks, trends, and technological innovations. This approach includes: (1) defensive search interventions; (2) regular direction of users to high authority, high quality sources; (3) removal of auto suggest and related search terms considered likely to lead users to low authority content; (4) partnerships with independent organisations for threat intelligence on information manipulation, civic integrity and nation state affiliated actors to inform potential algorithmic interventions and contribute to broader research community; (5) special information panels and answers to direct users to high authority sources concerning elections and voting; (6) internal working groups dedicated to addressing company-wide election initiatives; (7) establishing special election-focused product feature teams; (8) conducting internal research on content provenance and elections; (9) evaluating and undertaking red-team testing for generative Al features with respect to elections; (10) ensuring Responsible Al reviews for all Al features; (11) undertaking comprehensive risk assessments related to elections and electoral processes; (12) developing and continuing to improve targeted monitoring both for web search and Bing generative Al experiences; (13) restricting generative responses for certain types of election-related content; (14) leveraging blocklists and classifiers in Bing generative Al experiences to restrict generation of images or certain types of content concerning political candidates and certain election-related topics (15) integrating information on political parties, candidates, and elections from local election authorities (including in the EU) or high authority third party sources to inform defensive interventions and election-related product mitigations; and (16) regularly evaluating whether additional measures, metrics, or mitigations should be implemented.

Bing also maintains an incident response process for cross-functional teams to prioritize high-risk incidents and track the investigation, fixes, and post-incident analysis. Internal escalation processes are set up to ensure urgent cases—including sensitive issues related to elections or election-related content -- are addressed expediently with high priority. Bing also implemented a specialized intake and operations process under the Elections Working Group Rapid Response System and coordinates with Democracy Forward Election Hubs on incidents.

Bing also undertakes internal post-election reviews, as appropriate, to evaluate product and mitigation performance, reflect on challenges and learnings, and identify potential areas for improvement. These reviews occur both in product review settings and in broader cross-functional teams dedicated to elections at Microsoft.

**Microsoft**'s Democracy Forward team continues to expand its collaborations with organizations that provide information on authoritative sources, ensuring that queries about global events will surface reputable sites.

While not announced during the current reporting period, it is worth mentioning that in February 2024, Microsoft and LinkedIn came together with the tech sector at the Munich Security Conference to take a vital step forward against Al deepfakes, which will make it more difficult for malicious threat actors to use legitimate tools to create deepfakes. This focuses on the work of companies that create content generation tools and calls on them to strengthen the safety architecture in Al services by assessing risks and strengthening controls to help prevent abuse. This includes aspects such as ongoing red team analysis, preemptive classifiers, the blocking of abusive prompts, automated testing, and rapid bans of users who abuse the system. The accord brings the tech sector together to detect and respond to deepfakes in elections and will help advance transparency and build societal resilience to deepfakes in elections.

We combined this work with the launch of an expanded Digital Safety Unit. This will extend the work of our existing digital safety team, which has long addressed abusive online content and conduct that impacts children or that promotes extremist violence, among other categories. This team has special ability in responding on a 24/7 basis to

weaponized content from mass shootings that we act immediately to remove from our services. The accord's commitments oblige Microsoft and the tech sector to continue to engage with a diverse set of global civil society organizations, academics, and other subject matter experts. These groups and individuals play an indispensable role in the promotion and protection of the world's democracies.

See more at <u>Microsoft announces new steps to help protect elections - Microsoft On the Issues and Meeting the moment: combating Al deepfakes in elections through today's new tech accord - Microsoft On the Issues.</u>

In advance of the EU elections this summer we kicked off a global effort to engage campaigns and elections authorities to deepen understanding of the possible risks of deceptive AI in elections and empower those campaigns and election officials to speak directly to their voters about these risks steps they can take to build resilience and increase confidence in the election. In 2024, we have conducted nearly 200 training sessions for political stakeholders in 25 countries, reaching over 4300 participants. This includes almost 50 separate training events with over 500 participants across EEA, including in France prior to the parliamentary elections.

As part of Microsoft's commitments related to public awareness and engagement, Microsoft ran a campaign titled <a href="Check. Recheck. Vote.">Check. Recheck. Vote.</a> containing a series of public messages and stood up an AI and Elections website focused on engaging voters about the risks of deceptive AI and where to find authoritative election information. This campaign ran across the EU, France, UK, and the US in the lead up to major elections. Globally, the campaign reached hundreds of millions of people, with millions interacting with the content, connecting them with official election information.

In addition, Microsoft is harnessing the data science and technical capabilities of our AI for Good Lab and MTAC teams to better assess whether abusive content—including that created and disseminated by foreign actors—is synthetic or not. Microsoft AI for Good lab has been developing detection models (image, video) to assess whether media was generated or manipulated by AI. The model is trained on approximately 200,000 examples of AI and real content. AI for Good continues to invest in creating sample dataset representing the latest generative AI technology. When appropriate, we call on the expertise of Microsoft's Digital Crimes Unit to invest in and operationalize the early detection of AI-powered criminal activity and respond appropriately, through the filing of affirmative civil actions to disrupt and deter that activity and through threat intelligence programs and data sharing with customers and government.

We are also empowering candidates, campaigns and election authorities to help us detect and respond to deceptive AI targeting elections. In February 2024, we launched the Microsoft-2024 Elections site where candidates in a national or federal election can directly report deceptive AI election content on Microsoft consumer services. This reporting tool allows for 24/7 reporting by impacted election entities who have been targeted by deceptive AI found on Microsoft platforms.

[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].

#### **Policies and Terms and Conditions**

Outline any changes to your policies		
Policy	Changes (such as newly introduced policies, edits, adaptation in scope or implementation)	Rationale
Bing Search		
Authoritative Information sources	In advance of French Parliamentary elections, Bing launched special "How to Vote" Answer segments to show high authority information related to the election for users in France, localized by language. Bing Search directed users to official sources from the Ministry of Interior on section information seeking queries related to this election.	See more at Microsoft announces new steps to help protect elections - Microsoft On the Issues and the location specific blogs below.  France: Microsoft is committed to preserving the sincerity of the legislative elections in France
Microsoft		
Deepfakes and Elections	Last year Microsoft launched a web page – Microsoft-2024  Elections – where political candidates can report alleged deepfakes of themselves to Microsoft. To date, we have not received an actionable report of deceptive Al targeting elections on Microsoft platforms.  Microsoft's Office of Responsible Al has also established policies concerning election-related content and works with teams, including Bing and Image Creator on implementation.	See more at Meeting the moment: combating Al deepfakes in elections through new tech accord
Content Integrity tools	During the reporting period, Microsoft continued piloting Content Integrity Tools, which allowed users to add content credentials to their own authentic content. Designed as a pilot program primarily to support the 2024 election cycle and gather feedback about Content Credentials-enabled tools, during the reporting period of this report, the tools were available to political campaigns in the EU, as well as to elections authorities and select news media organizations in the EU and globally. These tools included a partnership and collaboration	These watermarking credentials empower an individual or organization to assert that an image or video came from them while protecting against tampering by showing if content was altered after its credentials were created. See more at <a href="Expanding our Content">Expanding our Content</a> Integrity tools to support global elections - Microsoft On the Issues

	with fellow Tech Accord signatory, TruePic. Announced in April 2024, this collaboration leveraged TruePic's mobile camera SDK enabling campaign, election, and media participants to capture authentic images, videos and audio directly from a vetted and secure device. Called the "Content Integrity Capture App" (an app that makes it easy to directly capture images with C2PA enabled signing) launched for both Android and Apple and can be used by participants in the Content Integrity Tools pilot program.	
Campaign Success Teams	Microsoft helps political campaigns navigate cybersecurity challenges and the new world of Al by deploying a newly formed "Campaign Success Team" within Microsoft Philanthropies' Tech for Social Impact organization. This team advises and supports campaigns as they navigate the world of Al, combat the spread of cyber influence campaigns, and protect the authenticity of their own content and images.	See more at Microsoft announces new steps to help protect elections - Microsoft On the Issues
AI Elections Trainings	As part of our commitments related to public awareness and engagement, Microsoft ran a campaign titled <a href="Check.Recheck.Vote">Check. Recheck.Vote</a> . containing a series of public messages and stood up an Al and Elections <a href="website">website</a> focused on engaging voters about the risks of deceptive Al and where to find authoritative election information. This campaign ran across the EU, UK, and the US in the lead up to major elections. Globally, the campaign reached hundreds of millions of people, with millions interacting with the content, connecting them with official election information.	
Communications Hub	Microsoft created and provides access to an "Election Communications Hub" to support democratic governments around the world as they build secure and resilient election processes.	See more at Microsoft announces new steps to help protect elections - Microsoft On the Issues

	T	
Virtual Situation Room	Microsoft established a Virtual Situation Room, bringing together resources across the company to monitor, support, and protect the French elections. This situation room tied into the rapid response protocol under the DSA. While Microsoft did not receive any reporting through the rapid response protocol throughout the French election we were prepared to intake any reporting and quickly respond.	
Foreign Malign Influence Updates	Microsoft publishes regular reports on foreign malign influence researched and reported by the company's MTAC team. The first report was released in November 2023.  Microsoft also <u>published</u> MTAC <u>analysis</u> on how Russian US election interference targets support for Ukraine in April 2024. This election report provides an update on what Microsoft has observed from Russia, Iran, and China and malicious use of Al since our November 2023 <u>report</u> .	See more at Microsoft announces new steps to help protect elections - Microsoft On the Issues  See more at Meeting the moment: combating Al deepfakes in elections through new tech accord  See more at Russian US election interference targets support for Ukraine after slow start - Microsoft On the Issues
LinkedIn		
False or misleading content	LinkedIn continually updates its policies as appropriate during any major global event, including French elections.	Misinformation, disinformation campaigns, coordinated manipulative behaviours, malicious use of advertising products, and the involvement of foreign state actors, are all harms that existed prior to the French elections, and therefore LinkedIn already had policies in place to address these harms.
Scrutiny of Ads Placements		
Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.		
LinkedIn		

Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue, including Frenchelections.  LinkedIn does not pay its members for creating content, other than in rare instances where we individually select and manage a small group of content creators to create professionally-relevant content.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available
	n/a
Microsoft Adverti	sing
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  As described in Section 3 of the report, Microsoft Advertising does not support political advertising.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available
	During the relevant reporting period, Microsoft Advertising blocked 191 phrases, which prevented keyword or ad submissions for the French election candidates and parties.
	Political Advertising
Outline approaches	s pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.
LinkedIn	
Specific Action applied (with reference to the	Description of intervention  Political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue, including European elections.

Code's relevant Commitment and Measure)	
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available
	n/a
Microsoft Adverti	sing
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Not applicable. As described in Section 3 of the report, Microsoft Advertising does not support political advertising.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available n/a
	Integrity of Services
Outline approaches	s pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.
LinkedIn	
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  LinkedIn also maintains a robust automated and manual ad-review process to prevent ads related to European Elections from running on our platform.  LinkedIn regularly meets with and exchanges information with industry peers to identify and share granular information related to manipulative behaviours, coordinated influence operations, and TTPs. All such content that violates LinkedIn's Professional Community Policies is removed.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

LinkedIn does not track misinformation content removal by subject matter, and a comprehensive listing of its misinformation content takedowns is provided in this disclosure and in its Transparency Report. See also SLI 18.2.1.

Impact metrics for malicious advertising removals are available in SLI 2.1.1 and 2.3.1, whereas metrics related to manipulative behaviors and TTPs are available in SLI 12.1.1 and 14.2.1.

#### **Bing Search**

#### Specific Action applied (with reference to the Code's relevant Commitment and Measure)

Description of intervention

Bing Search takes a multifaceted approach to protecting election integrity and regularly updates its processes, policies, and practices to adapt to evolving risks, trends, and technological innovations. This approach includes: (1) defensive search interventions; (2) regular direction of users to high authority, high quality sources; (3) removal of auto suggest and related search terms considered likely to lead users to low authority content; (4) partnerships with independent organizations for threat intelligence on information manipulation, civic integrity and nation state affiliated actors to inform potential algorithmic interventions and contribute to broader research community; (5) special information panels and answers to direct users to high authority sources concerning elections and voting; (6) internal working groups dedicated to addressing company-wide election initiatives; (7) establishing special election-focused product feature teams; (8) conducting internal research on content provenance and elections; (9) evaluating and undertaking red-team testing for generative AI features with respect to elections; (10) ensuring Responsible AI reviews for all AI features; (11) undertaking comprehensive risk assessments related to elections and electoral processes; (12) developing and continuing to improve targeted monitoring both for web search and generative AI features; (13) restricting responses for certain types of election-related content; (14) leveraging blocklists and classifiers in Bing generative AI experiences to restrict generation of images or certain types of content concerning political candidates and certain election-related topics (15) integrating information on political parties, candidates, and elections from local election authorities (including in the EU) or high authority third party sources to inform defensive interventions and election-related product mitigations; and (16) regularly evaluating whether additional measures, metrics, or mitigations should be implemented. These measures are in

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

- In advance of the France parliamentary election, Bing launched a special "How to Vote" information Answer to show high authority information related to the election for users in France., localized by language. Bing Search directed users to official sources from the Ministry of Interior on select information seeking queries related to this election. This has led to 36k total impressions.
- Bing has identified numerous information manipulation themes related to the 2024 French Parliamentary election, which have informed defensive search interventions and fanouts to related search terms.

	Empowering Users
Outline approaches	s pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.
LinkedIn	
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  LinkedIn has an internal team of global news editors that provides trustworthy and authoritative content to its member-base at all times. During important events in European elections, this team provides manually curated and localised storylines.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available
Bing Search	
Partnerships with Election Authorities and Trusted Partners (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Bing Search empowers voters with authoritative election information on Bing. We do this in partnership with organizations that provide information on authoritative sources, ensuring that queries about election administration will surface reputable sites.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available

Specific Action applied (with reference to the Code's relevant Commitment and Measure)

#### Description of intervention

In advance of the France parliamentary election, Bing launched a special "How to Vote" information Answer to show high authority information related to the election for users in France, localized by language. Bing Search directed users to official source from the Ministry of Interior on select information seeking queries related to this election, as depicted below.



Indication of impact (at beginning of action: expected impact) including relevant metrics when available

#### **How to Vote Answers**

Bing documented 36,000 impressions globally on the "How to Vote" special answer for the France parliamentary election in the answer implementation period from 21 June – 8 July 2024, out of which 14,800 occurred in the reporting period (after 1 July 2024)

#### **Empowering the Research Community**

Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.		
Bing Search	Bing Search	
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  None for Bing	
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available	
	Such research helps to inform Bing safety mitigations.	
LinkedIn	LinkedIn	
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  None for LinkedIn	
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available  None for LinkedIn	
Empowering the Fact-Checking Community		
Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.		
LinkedIn	LinkedIn	

Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  LinkedIn works with globally-recognised factcheckers to receive their independent judgment regarding user-generated content. Content that violates LinkedIn's policy on false and misleading content is removed.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available
	LinkedIn does not separately track election related content sent to external fact checkers. Further detail regarding content sent to fact checkers is available at SLI 21.1.1, 30.1.1, and 31.1.1.
Bing Search	
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Bing utilizes threat intelligence to inform the Bing algorithm and defensive search measures for Bing search and Bing generative AI features. Bing works with trusted third-party partners for leads of potential threats (including in EEA member state languages) to inform defensive search strategies. Bing also utilises the ClaimReview open protocol to ingest fact checks into search results.  Bing increased coverage of EEA member state languages, informing interventions across monitored themes and sources.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available
	n/a
Microsoft	
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  In December 2023, the Institute for Nonprofit News teamed up with DeleteMe, funded by Microsoft's Democracy Forward Initiative, to help decrease the amount of personal information about journalists that can be discovered online. The collaboration protects local journalists from threats during a critical election year and ensures they can provide high-quality information to local communities. The Microsoft Journalism Hub is an ongoing resource center built to connect the journalism community more seamlessly with tools, technology, services, and partner programs designed to support their unique

business needs. These resources are distributed across Microsoft's three journalism initiative commitments: rebuilding capacity in local news ecosystems; restoring trust in news; and reducing legal and cyber risks for journalists.
Microsoft has partnered with Nota to allow journalists to access helpful Al tools for tasks such as improving SEO, creating videos of published stories, and writing headlines. Nota's assistive Al tools build time-saving production infrastructure for digital publishing—creating an accessible engagement economy, offering instant content conversion and content amplification, multiplying video content revenue and doing away with repetitive tasks that have long required journalists to act as generalists in multiple fields.
Indication of impact (at beginning of action: expected impact) including relevant metrics when available n/a

#### Reporting on the services' response during an election

#### 2024 Romanian Presidential Elections

Threats observed during the electoral period:

**LinkedIn** is an online professional networking site with a real identity requirement, which means that content posted by our members is visible to that member's professional network, including colleagues, managers, and potential future employers. As a result of LinkedIn's professional context, our members come to LinkedIn for economic opportunity, and as such, do not tend to post misinformation, nor does misinformation content gain traction on LinkedIn. Nonetheless, LinkedIn may be subject to certain members inadvertently posting misinformation during elections.

**Bing Search** anticipated instances of information manipulation with possible actor intent to manipulate search algorithms and lead users to data voids and low-authority content related to elections. As part of its regular information integrity operations, Bing detected information manipulation themes related to the 2024 Romanian Presidential Election, which have been ingested to inform defensive search interventions.

Mitigations in place during the electoral period:

**LinkedIn**'s Professional Community Policies expressly prohibit false and misleading content, including <u>misinformation</u> and <u>disinformation</u>, and its in-house Editorial team provides members with trustworthy content regarding global events, including European Elections. LinkedIn had approximately 1,443 content moderators globally (for 24/7) coverage, with 180 content moderators located in the EU as at 31 December 2024. These reviewers use policies and guidance developed by a dedicated content policy team and experienced lawyers, and work with external fact checkers as needed. When LinkedIn sees content or behaviour that violates its Professional Community Policies, it takes action, including the removal of content or the restriction of an account for repeated abusive behaviour.

Political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue, including European Elections. LinkedIn also does not provide a mechanism for content creators to monetise the content they post on LinkedIn.

**LinkedIn** continues to mature its crisis response processes. Including 1) quickly coordinating with industry peers regarding the exchange of threat indicators; 2) engaging with external stakeholders regarding trends and TTPs; 3) continuously providing updated policy guidance to internal teams to assist with the removal of misinformation; and 4) continuing to proactively provide localised trustworthy information to our members.

LinkedIn has continued to mature its crisis response playbook by continually monitoring crisis situations globally, expanding internal teams that work on crisis response, and maturing our processes to respond more efficiently and effectively to crisis situations. LinkedIn will continue to follow its processes related to the removal of misinformation, and continually increase investments in resource allocation and process improvements where necessary to respond to the demands of the crisis.

LinkedIn also implemented a specialized intake and operations process under the Elections Working Group Rapid Response System for the Romanian Presidential elections.

**Bing Search** takes a multifaceted approach to protecting election integrity and regularly updates its processes, policies, and practices to adapt to evolving risks, trends, and technological innovations. This approach includes: (1) defensive search interventions; (2) regular direction of users to high authority, high quality sources as part of the search algorithm; (3) removal of auto suggest and related search terms considered likely to lead users to low authority content; (4) partnerships with independent organisations for threat intelligence on information manipulation, civic integrity and nation state affiliated actors to inform potential algorithmic interventions and contribute to broader research community; (5) special information panels and answers to direct users to high authority sources concerning elections and voting; (6) internal working groups dedicated to addressing company-wide election initiatives; (7) establishing special election-focused product feature teams; (8) conducting internal research on content provenance and elections; (9) evaluating and undertaking red-team testing for generative AI features with respect to elections and political content; (10) ensuring Responsible AI reviews for all AI features; (11) undertaking comprehensive risk assessments related to elections and electoral processes; (12) developing and continuing to improve targeted monitoring both for web search and Bing generative AI experiences; (13) restricting generative AI responses for certain types of election-related content; (14) leveraging blocklists and classifiers in generative AI experiences to restrict generation of images or certain types of content concerning political candidates and certain election-related topics; (15) integrating information on political parties, candidates, and elections from local election authorities (including in the EU) or high authority third party sources to inform defensive interventions and election-related product mitigations; and (16) regularly evaluating whether additional safe

Bing also participated in the Election Rapid Response System and roundtable discussion in November 2024 with EU member state authorities and the European Commission to discuss election-related learnings and general election response. Bing also undertakes internal post-election reviews, as appropriate, to evaluate product and mitigation performance, reflect on challenges and learnings, and identify potential areas for improvement. These reviews occur both in product review settings and in broader cross-functional teams dedicated to elections at Microsoft.

Bing also maintains an incident response process for cross-functional teams to prioritize high-risk incidents and track the investigation, fixes, and post-incident analysis. Internal escalation processes are set up to ensure urgent cases—including sensitive issues related to elections or election-related content -- are addressed expediently with high priority. Bing also implemented a specialized intake and operations process under the Elections Working Group Rapid Response System and coordinates with Democracy Forward Election Hubs on incidents.

Throughout the reporting period and in line with your commitments under the Tech Accord Microsoft and LinkedIn continued to take vital steps forward against Al deepfakes, which make it more difficult for malicious actors to use legitimate tools to create deepfakes targeting candidates, campaigns and election authorities. This work focused on content generation tools, strengthening the safety architecture in Al services by assessing risks and strengthening controls to help prevent abuse. This includes aspects such as ongoing red team analysis, preemptive classifiers, the blocking of abusive prompts, automated testing, and rapid bans of users who generate deceptive Al targeting elections.

We combined this work with the launch of an expanded Digital Safety Unit. This will extend the work of our existing digital safety team, which has long addressed abusive online content and conduct that impacts children or that promotes extremist violence, among other categories. This team has special ability in responding on a 24/7 basis to weaponized content from mass shootings that we act immediately to remove from our services. The accord's commitments oblige Microsoft and the tech sector to continue to

engage with a diverse set of global civil society organizations, academics, and other subject matter experts. These groups and individuals play an indispensable role in the promotion and protection of the world's democracies.

See more at Microsoft announces new steps to help protect elections - Microsoft On the Issues and Meeting the moment: combating Al deepfakes in elections through today's new tech accord - Microsoft On the Issues.

In advance of the EU elections this summer we kicked off a global effort to engage campaigns and elections authorities to deepen understanding of the possible risks of deceptive AI in elections and empower those campaigns and election officials to speak directly to their voters about these risks steps they can take to build resilience and increase confidence in the election. This year we have conducted almost 200 training sessions for political stakeholders in 25 countries, reaching over 4300 participants. This includes almost fifty separate training events with nearly 500 participants...

As part of our commitments related to public awareness and engagement, Microsoft ran a campaign titled <a href="Check. Recheck. Vote">Check. Recheck. Vote</a>. containing a series of public messages and stood up an Al and Elections <a href="website">website</a> focused on engaging voters about the risks of deceptive Al and where to find authoritative election information. This campaign ran across the EU, UK, and the US in the lead up to major elections. Globally, the campaign reached hundreds of millions of people, with millions interacting with the content, connecting them with official election information.

In addition, Microsoft is harnessing the data science and technical capabilities of our Al for Good Lab and MTAC teams to better assess whether abusive content—including that created and disseminated by foreign actors—is synthetic or not. Microsoft Al for Good lab has been developing detection models (image, video) to assess whether media was generated or manipulated by Al. The model is trained on approximately 200,000 examples of Al and real content. Al for Good continues to invest in creating sample dataset representing the latest generative Al technology. When appropriate, we call on the expertise of Microsoft's Digital Crimes Unit to invest in and operationalize the early detection of Al-powered criminal activity and respond appropriately, through the filing of affirmative civil actions to disrupt and deter that activity and through threat intelligence programs and data sharing with customers and government.

We are also empowering candidates, campaigns and election authorities to help us detect and respond to deceptive Al targeting elections. We launched the Microsoft-2024 Elections site where candidates in a national or federal election can directly report deceptive Al election content on Microsoft consumer services. This reporting tool allows for 24/7 reporting by impacted election entities who have been targeted by deceptive Al found on Microsoft platforms.

[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].

#### **Policies and Terms and Conditions**

Outline any changes to your policies

Policy	Changes (such as newly introduced policies, edits, adaptation in scope or implementation)	Rationale
Bing Search		
Authoritative Information sources	Bing aims provide the high quality, authoritative content relevant to users' search terms. Our goal is to always provide fair, balanced, and comprehensive content. When there are multiple credible perspectives, we try to display them in informative ways. When there is no authoritative source, our goal is to avoid promoting bias or potentially misleading information. See more in <a href="How Bing delivers search results - Microsoft Support">How Bing delivers search results - Microsoft Support</a>	
Microsoft		
Deepfakes and Elections	Last year, Microsoft launched a new web page – Microsoft-2024  Elections – where political candidates can report alleged deepfakes of themselves to Microsoft. To date, we have not received an actionable report of deceptive AI targeting elections on Microsoft platforms.  Microsoft's Office of Responsible AI has also established policies concerning election-related content and works with teams, including Bingand Bing Image Creator, on implementation.	See more at Meeting the moment: combating Al deepfakes in elections through new tech accord
Content Integrity tools	During the reporting period, Microsoft continued piloting Content Integrity Tools, which allowed users to add content credentials to their own authentic content. Designed as a pilot program primarily to support the 2024 election cycle and gather feedback about Content Credentials-enabled tools, during the reporting period of this report, the tools were available to political campaigns in the EU, as well as to elections authorities and select news media organizations in the EU and globally. These tools included a partnership and collaboration with fellow Tech Accord signatory, TruePic. Announced in April 2024, this collaboration leveraged	These watermarking credentials empower an individual or organization to assert that an image or video came from them while protecting against tampering by showing if content was altered after its credentials were created. See more at Expanding our Content Integrity tools to support global elections - Microsoft On the Issues

	TruePic's mobile camera SDK enabling campaign, election, and media participants to capture authentic images, videos and audio directly from a vetted and secure device. Called the "Content Integrity Capture App" (an app that makes it easy to directly capture images with C2PA enabled signing) launched for both Android and Apple and can be used by participants in the Content Integrity Tools pilot program.	
Campaign Success Teams	Microsoft helps political campaigns navigate cybersecurity challenges and the new world of AI by deploying a newly formed "Campaign Success Team" within Microsoft Philanthropies' Tech for Social Impact organization. This team advises and supports campaigns as they navigate the world of AI, combat the spread of cyber influence campaigns, and protect the authenticity of their own content and images.	See more at Microsoft announces new steps to help protect elections - Microsoft On the Issues
Al Elections Trainings	In advance of the elections across the EU,we kicked off a global effort to engage campaigns and elections authorities to deepen understanding of the possible risks of deceptive AI in elections and empower those campaigns and election officials to speak directly to their voters about these risks steps they can take to build resilience and increase confidence in the election. In 2024, we have conducted almost 200 training sessions for political stakeholders in 25 countries, reaching over 4300 participants. This includes almost fifty separate training events with nearly 500 participants.	
Communications Hub	Microsoft created and provides access to a new "Election Communications Hub" to support democratic governments around the world as they build secure and resilient election processes.	See more at Microsoft announces new steps to help protect elections - Microsoft On the Issues

#### Foreign Malign Influence Updates

Microsoft publishes regular reports on foreign malign influence researched and reported by the company's MTAC team. The <u>first</u> report was released in November 2023.

Microsoft also <u>published</u> MTAC <u>analysis</u> on how Russian US election interference targets support for Ukraine in April 2024. This election report provides an update on what Microsoft has observed from Russia, Iran, and China and malicious use of Al since our November 2023 report.

See more at <u>Microsoft announces new steps to help protect elections</u> - Microsoft On the Issues

See more at <u>Meeting the moment: combating AI deepfakes in elections</u> through new tech accord

<u>See more at Russian US election interference targets support for Ukraine after slow start - Microsoft On the Issues</u>

#### LinkedIn

### False or misleading content

LinkedIn continually updates its policies as appropriate during any major global event, including European elections.

Misinformation, disinformation campaigns, coordinated manipulative behaviours, malicious use of advertising products, and the involvement of foreign state actors, are all harms that existed prior to the recently-concluded European elections, and therefore LinkedIn already had policies in place to address these harms.

#### **Scrutiny of Ads Placements**

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

#### LinkedIn

# **Specific Action applied** (with reference to the Code's relevant Commitment and Measure)

Description of intervention

Political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue, including European Elections.

LinkedIn does not pay its members for creating content, other than in rare instances where we individually select and manage a small group of content creators to create professionally-relevant content.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

n/a

Microsoft Advertising			
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  As described in Section 3 of the report, Microsoft Advertising does not support political advertising.		
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available  During the relevant reporting period, Microsoft Advertising blocked 19 phrases, which I prevented future keyword or ad submissions for the Romanian election candidates and parties.		
	Political Advertising		
Outline approaches perti	Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.		
LinkedIn			
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue, including European Elections.  Indication of impact (at beginning of action: expected impact) including relevant metrics when available  n/a		
Microsoft Advertising			
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Not applicable. As described in Section 3 of the report, Microsoft Advertising does not support political advertising.		
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available n/a		
Integrity of Services			

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

#### LinkedIn

#### Specific Action applied (with reference to the Code's relevant Commitment and Measure)

Description of intervention

LinkedIn also maintains a robust automated and manual ad-review process to prevent ads related to European elections from running on our platform.

LinkedIn regularly meets with and exchanges information with industry peers to identify and share granular information related to manipulative behaviours, coordinated influence operations, and TTPs. All such content that violates LinkedIn's Professional Community Policies is removed.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

LinkedIn does not track misinformation content removal by subject matter, and a comprehensive listing of its misinformation content takedowns is provided in this disclosure and in its Transparency Report. See also SLI 18.2.1.

Impact metrics for malicious advertising removals are available in SLI 2.1.1 and 2.3.1, whereas metrics related to manipulative behaviors and TTPs are available in SLI 12.1.1 and 14.2.1.

#### **Bing Search**

## Specific Action applied (with reference to the Code's relevant Commitment and Measure)

Description of intervention

Bing Search takes a multifaceted approach to protecting election integrity and regularly updates its processes, policies, and practices to adapt to evolving risks, trends, and technological innovations. This approach includes: (1) defensive search interventions; (2) regular direction of users to high authority, high quality sources; (3) removal of auto suggest and related search terms considered likely to lead users to low authority content; (4) partnerships with independent fact checkers, research and nonprofit organisations to maintain threat intelligence and inform potential algorithmic interventions and contribute to broader research community; (5) special information panels and answers to direct users to high authority sources concerning elections and voting; (6) internal working groups dedicated to addressing company-wide election initiatives; (7) establishing special election-focused product feature teams; (8) conducting internal research on content provenance and elections; (9) evaluating and undertaking redteam testing for generative AI features with respect to elections and political content; (10) ensuring Responsible AI reviews for all AI features; (11) undertaking comprehensive risk assessments related to elections and electoral processes; (12) developing and continuing to improve targeted monitoring both for web search and Bing Generative AI experiences; (13) restricting generative AI responses for certain types of election-related content; (14) leveraging blocklists and classifiers in Bing generative AI experiences to restrict generation of images or certain types of content concerning political candidates and certain election-related topics; (15) integrating information on political parties, candidates, and elections from local election authorities or high authority third party sources to inform defensive interventions and election-related product mitigations; (16) working

with reputable third parties to test election-related responses in Bing generative AI experiences r; and (17) regularly evaluating whether additional measures, metrics, or mitigations should be implemented. These measures are integrated into Bing Search and Bing generative AI experiences, along with the additional safeguards discussed at QRE 14.1.1 and QRE 14.1.2 and other measures discussed throughout this report.

Bing participated in post-election roundtable sessions to share learnings with the European Commission and Romania's local DSC in November 2024..

Bing also undertakes internal post-election reviews, as appropriate, to evaluate product and mitigation performance, reflect on challenges and learnings, and identify potential areas for improvement. These reviews occur both in product review settings and in broader cross-functional teams dedicated to elections at Microsoft.

Given the rapid response required to respond to urgent election issues, Bing maintained an incident response process for cross-functional teams to prioritize high-risk incidents and track the investigation, fixes, and post-incident analysis. Internal escalation processes are set up to ensure urgent cases—including sensitive issues related to elections or election-related content—are addressed expediently with high priority. Bing also implemented a specialized intake and operations process under the Elections Working Group Rapid Response System and coordinates with broader Microsoft Election Hubs on incidents.

Through Microsoft's Democracy Forward team, Bing has also integrated information on political parties, candidates, and elections from local election authorities or high authority third party sources to inform defensive interventions and election-related product mitigations.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

• Bing identified a numerous information manipulation themes related to the Romanian Presidential election, which have informed defensive search interventions and fanouts to related search terms.

#### **Empowering Users**

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

#### LinkedIn

### **Specific Action applied** (with reference to the Code's relevant

Description of intervention

LinkedIn has an internal team of global news editors that provides trustworthy and authoritative content to its member-base at all times. During important events in European elections, this team provides manually curated and localised storylines.

Commitment and Measure)	Indication of impact (at beginning of action: expected impact) including relevant metrics when available
Bing Search	
Partnerships with Election Authorities and Trusted Partners (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Bing Search empowers voters with authoritative election information on Bing. Bing does this in partnership with organizations that provide information on authoritative sources, ensuring that queries about election administration will surface reputable sites.  Indication of impact (at beginning of action: expected impact) including relevant metrics when available
Outline approaches pertine	Empowering the Research Community  nent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  None for Bing  Indication of impact (at beginning of action: expected impact) including relevant metrics when available  N/A
LinkedIn	
Specific Action applied (with reference to the Code's relevant	Description of intervention  None for LinkedIn

Commitment and Measure)			
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available  None for LinkedIn		
	Empowering the Fact-Checking Community		
Outline approaches pertin	Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.		
LinkedIn			
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  LinkedIn works with globally-recognised factcheckers to receive their independent judgment regarding user-generated content. Content that violates LinkedIn's policy on false and misleading content is removed.  Indication of impact (at beginning of action: expected impact) including relevant metrics when available  LinkedIn does not separately track election related content sent to external fact checkers. Further detail regarding content sent to fact checkers is available at SLI 21.1.1, 30.1.1, and 31.1.1.		
Bing Search			
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention  Articles from news and fact checking organizations may also appear as part of specialized Bing Answers. In addition, news and fact-check articles can appear in Bing News carousels, which are often presented at the top of search results pages, depending on the nature of user query. Microsoft maintains agreements with news publishers to surface high authority content, including articles from well-regarded fact checking organizations and journalist-driven fact-checks, high in relevant search results.  Bing utilizes threat intelligence to inform the Bing algorithm and defensive search measures for Bing search and Bing generative Al experiences. Bing works with trusted third-party partners for leads of potential threats (including in EEA member state languages) to inform defensive search strategies. Bing also utilises the ClaimReview open protocol to ingest fact checks into search results. To improve coverage during the Reporting Period Bing also leveraged fact check intelligence from European Digital Media Observatory.		

Bing increased the coverage of EEA member state languages, informing interventions across monitored themes and sources.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available n/a

#### Microsoft

## Specific Action applied (with reference to the Code's relevant Commitment and Measure)

Description of intervention

In December 2023, the Institute for Nonprofit News teamed up with DeleteMe, funded by Microsoft's Democracy Forward Initiative, to help decrease the amount of personal information about journalists that can be discovered online. The collaboration protects local journalists from threats during a critical election year and ensures they can provide high-quality information to local communities. The Microsoft Journalism Hub is an ongoing resource center built to connect the journalism community more seamlessly with tools, technology, services, and partner programs designed to support their unique business needs. These resources are distributed across Microsoft's three journalism initiative commitments: rebuilding capacity in local news ecosystems; restoring trust in news; and reducing legal and cyber risks for journalists.

Microsoft has partnered with Nota to allow journalists to access helpful Al tools for tasks such as improving SEO, creating videos of published stories, and writing headlines. Nota's assistive Al tools build time-saving production infrastructure for digital publishing—creating an accessible engagement economy, offering instant content conversion and content amplification, multiplying video content revenue and doing away with repetitive tasks that have long required journalists to act as generalists in multiple fields.

Indication of impact (at beginning of action: expected impact) including relevant metrics when available

n/a