

Code of Conduct on
Disinformation – Report of
Democracy Reporting
International for the period
1 January 2025 –
31 December 2025

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Executive summary

Democracy Reporting International's (DRI) Digital Democracy Programme Unit monitors threats to information integrity during political events and electoral periods across Europe and beyond. Our Digital Democracy team conducts social media monitoring, audits AI-powered chatbots for their impact on political online discourse and formulates policy recommendations for various stakeholders in the technology and society ecosystem, including lawmakers, tech platforms, and civil society organizations. During 2025 we continue our active work as signatories of the Code, among others, co-chairing the Taskforce on Elections.

Exposed widespread inauthentic behaviour on TikTok: DRI continued its research into murky accounts during the reporting period, with a focus on elections in Germany, Poland, and Romania. In 2025, using authenticity indicators and account-level metrics, we identified and reported 482 inauthentic accounts through the Rapid Response System, documenting how these accounts impersonate political actors, amplify partisan messaging, and distort perceptions of political support. Our findings show that murky accounts remain a persistent problem on platforms, particularly during elections, and reinforce the need for stronger detection and enforcement against inauthentic behaviour.

Advocated for data access for civil society researchers: DRI continued its work on platform transparency and accountability by examining the nature and limits of researcher access to platform data under Article 40 of the DSA. During the reporting period, we undertook litigation action against X, published analyses and opinion pieces on barriers to meaningful access, engaged with more than 88 stakeholders through meetings and webinars to raise awareness, shared practical lessons from using platform tools and pursuing legal remedies. This work aimed to clarify how existing access mechanisms function in practice and to support stronger, more consistent implementation of researcher data access.

Generated evidence about social media's impact on elections and political discourse: DRI carried out social media monitoring across the Austrian, German, Polish, and Sri Lankan elections, identifying toxic narratives, disinformation risks, and harmful online speech affecting both historically marginalised groups and electoral integrity. Using methods such as keyword-based monitoring, sentiment analysis, and computational analysis of online content, we tracked how divisive narratives, discriminatory rhetoric, and polarising campaign strategies spread across platforms during these electoral periods.

Raised awareness about AI-related election risks and advocated for the transparency of AI-generated content: DRI audited the most popular chatbots during the German federal elections and identified both inaccurate electoral information and unlabelled generative AI content in political communication. DRI also engaged in policy discussions under the EU Code of Practice on Transparency of AI-Generated Content and provided input to the European Commission on transparency, labelling, and accountability standards for generative AI.

Increased engagement and knowledge exchange on platform transparency and accountability: Our work during the reporting period remained closely tied to the Code of Conduct framework through DRI's co-chairing role in the Elections Working Group and our use of the Rapid Response System. We also convened more than six roundtables, webinars, and conferences with researchers, regulators, civil society groups, and other stakeholders on election integrity, platform accountability, and data access.

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

Measure 14.1

Relevant signatories will adopt, reinforce and implement clear policies regarding impermissible manipulative behaviors and practices on their services, based on the latest evidence on the conducts, tactics, techniques and procedures (TTPs) employed by malicious actors, such as the AMITT Disinformation Tactics, Techniques and Procedures Framework.

QRE 14.1.1

Relevant Signatories will list relevant policies and clarify how they relate to the threats mentioned above as well as to other disinformation threats.

Murky accounts as a systemic threat to elections in the EU

In 2025, DRI continued its systematic reporting on *murky accounts* as part of efforts to address impermissible manipulative behaviours and practices across online services.

DRI monitored 3 elections in *Romania, Poland* and *Germany* in 2025. In these elections, we identified networks of impersonation accounts, fake engagement ecosystems, and inauthentic amplification on TikTok.

A list of all Murky Accounts reports can be found in QRE 14.2.1.

Research on Election Information Integrity and Policy Recommendations

Through DRI’s activities across Europe and beyond in 2025, we continued to identify trends in online discourse and detect instances of threats to information integrity, including disinformation, hate speech, and toxic content. The following is a list of DRI’s 2025 efforts to identify impermissible online content, behaviours, and practices relevant to Commitment 14, alongside the policy measures recommended to mitigate their spread. In addition to European electoral contexts, DRI also conducted social media monitoring in South Asia and Africa:

- [From Hashtags to Votes: Social Media Patterns in Austria’s 2024 National Elections](#) | 29.01.2025
- [Big tech is backing out of commitments countering disinformation—What’s Next for the EU’s Code of Practice?](#) | 07.02.2025
- [The DSA Alone Won’t Save Democracy – but Its Interplay with the Rule of Law Might](#) | 07.02.2025
- [Filtered for You: Algorithmic Bias on TikTok and Instagram in Germany](#) | 10.04.2025
- [Ensuring Electoral Integrity: Election Observers in Southern Africa](#) | 23.04.2025
- [Political Exposure Bias in Recommender Systems: A Review of Evidence from the U.S. and German Elections](#) | 30.04.2025
- [Biased by Design? Chatbots and Misinformation in Sri Lanka’s 2025 Local Elections](#) | 14.05.2025
- [Engagement Wars: Inside the Polish Presidential Campaigns on Social Media.](#) | 30.05.2025
- [Digital Duel: Online Campaign Strategies in Poland’s Presidential Runoff](#) | 17.06.2025
- [Democracy in Disguise: Inauthentic Online Influence on the 2025 Sri Lanka’s Local Government Elections](#) | 17.07.2025
- [Algorithms and Agendas: The Digital Fight for Poland’s Presidency 2025](#) | 31.07.2025
- [Access or Exit Democracy? Elections and Digital Trends in the EU, 2023-2025](#) | 04.11.2025

	<ul style="list-style-type: none"> • When Politics Turns Personal: Hate Speech and Online Gender-Based Violence in Sri Lanka’s 2025 Local Elections 23.11.2025 <p>Data Access</p> <p>To support effective implementation of Article 40 of the Digital Services Act, DRI produced a series of policy analyses examining regulatory gaps, researcher access barriers, and platform transparency obligations. This work was also informed by our first case against X concerning access to German election data, which highlighted the practical obstacles researchers continue to face when seeking access to publicly available platform data. Together, these publications provide legal and operational recommendations to strengthen access to platform data and enable independent scrutiny of systemic online risks:</p> <ul style="list-style-type: none"> • Why We’re Suing Elon Musk’s X for German Election Data 27.02.2025 • Case Against X: Berlin Court Confirms Researchers Can Enforce Their Right to Data Access in National Courts 13.05.2025 • Unpacking TikTok’s Data Access Illusion 12.06.2025 • Overview of Platform Data Access Mechanisms 17.12.2025 <p>Interactive tools hosted on the Digital Democracy Monitor Knowledge Hub presented key findings on platform obligations, enforcement pathways, and implementation gaps in a more accessible format, supporting better understanding of online election risks and possible responses:</p> <ul style="list-style-type: none"> • Monitoring the EU Code of Practice on Disinformation 01.2025 • DSA Framework for Online Election Integrity 04.2025
<p>Measure 14.2</p>	<p><i>Relevant Signatories will keep a detailed, up-to-date list of their publicly available policies that clarifies behaviours and practices that are prohibited on their services and will outline in their reports how their respective policies and implementation address the above set of TTPs, threats and harms as well as other relevant threats. Such information will also be reported in the Transparency Centre. The list of TTPs will serve as the base for the TTPs to be reported upon and relevant Signatories will work within the permanent Taskforce to further develop and refine related indicators on the impact/effectiveness of their related actions. Relevant Signatories will also develop further metrics to estimate the penetration and impact that fake/inauthentic accounts have on genuine users and report at the Member State Level (including trends on audiences targeted; narratives used etc).</i></p>
<p>QRE 14.2.1</p>	<p>Across the German, Romanian, and Polish elections, DRI flagged 482 murky TikTok accounts in 2025, out of which 394 were removed by TikTok following internal review under its Terms of Service and Community Guidelines.</p>

Relevant Signatories will report on actions taken to implement the policies they list in their reports and covering the range of TTPs identified/employed, at the Member State level.	<ul style="list-style-type: none"> • Scroll for a Fake: TikTok Murky Accounts Impersonate German Parties and Politicians Ahead of Elections 18.02.2025 • Scroll, Like, Deceive: Murky Political Accounts on TikTok before the German 2025 Elections 21.03.2025 • 323 murky accounts and one denied candidacy: TikTok's role in Romania's 2025 election 11.06.2025 • Unverified and Unchecked: Murky TikTok Accounts in Poland's 2025 Elections 18.06.2025 	
SLI 14.2.1		
TTP OR ACTION 1 [replicate for number of TTPs or actions reported]	SLI 14.2.1	
	Nr of instances of identified TTP	Nr of actions taken by type
Data	<i>We reported 482 murky accounts on TikTok.</i>	<i>TikTok acted on 394 of these reports.</i>
	<i>We reported 7 cases of unlabelled generative AI content with harmful stereotypes on Meta(Facebook)</i>	
	<i>We observed 6 cases of unlabelled political advertising in the Meta content library.</i>	

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.	
Measure 15.1	<i>Relevant Signatories will establish or confirm their policies in place for countering prohibited manipulative practices for AI systems that generate or manipulate content, such as warning users and proactively detect such content.</i>

QRE 15.1.1

In line with EU and national legislation, relevant Signatories will report on their policies in place for countering prohibitive manipulative practices for AI systems that generate or manipulate content.

During the reporting period, DRI monitored and reported risks from AI systems that generate or manipulate content in electoral contexts. We **audited major LLM chatbots** during the German federal elections and identified inaccurate and fabricated election information, calling for consistent safeguards and redirection to authoritative sources. We also identified and **reported political uses of unlabelled generative AI content**, including seven ads and posts from official party accounts breaching platform hateful conduct policies.

Below is a list of DRI reports published during the reporting period related to these efforts:

- [Inconsistent and Unreliable: Chatbots Provide Inaccurate Information on German Elections](#) | 12.02.2025
- [The AfD on Facebook: Fear, Anti-CDU posts and Abuse of AI](#) | 03.03.2025

At the policy level, **DRI joined the EU Code of Practice on Transparency of AI-Generated Content** and submitted joint civil society recommendations to strengthen transparency, labelling, and accountability standards for generative AI. We proposed clearer deepfake definitions, stronger explainability requirements, lifecycle transparency obligations, and multi-layered watermarking standards. DRI also provided input to the European Commission warning that simplifying the AI Act risks weakening fundamental rights protections.

- [Joint feedback](#) with the *European Partnership for Democracy (EPD)*, *CEE Digital Democracy Watch*, and *GLOBSEC* on transparency requirements for generative AI systems under Article 50 of the AI Act | 09.10.2025

DRI also engaged with the **European Commission's Digital Omnibus** process, submitting feedback to ensure that efforts to streamline EU AI act guidelines do not weaken key accountability safeguards.

- [Simplification digital package and omnibus — Feedback from: Democracy Reporting International \(DRI\)](#) | 14.10.2025

As part of its work on AI governance and platform accountability, DRI participated in expert fora to strengthen coordination:

	<ul style="list-style-type: none"> • Connected Learnings – Transparency and Accountability in AI Systems and Social Media 12.03.2025. Online workshop with researchers from GPAI and social media fields on joint data access advocacy and moving from transparency demands toward stronger scrutiny frameworks. DRI presented key research and advocacy findings.
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IV. Integrity of Services	
Commitment 16	
<p>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.</p>	
Measure 16.1	<p><i>Relevant signatories will share relevant information about cross-platform information manipulation, foreign interference in information space and incidents that emerge on their respective services for instance via a dedicated sub-group of the permanent Task-force or via existing fora for exchanging such information.</i></p>
<p>QRE 16.1.1 <i>Relevant signatories will disclose the fora they use for information sharing as well as information about learnings derived from this sharing.</i></p>	<p>Participating in and establishing fora for sharing information on the tools, tactics, and narratives deployed by disinformation actors is a key facet of DRI’s Digital Democracy work. The following is a list of working groups, webinars, conferences, and roundtables attended during the reporting period, with DRI in the role of either organiser or presenter:</p> <ul style="list-style-type: none"> • DRI co-chairs the Elections Working Group under the EU Code of Practice on Disinformation (transitioned to Code of Conduct in February 2025). Since June 2023, DRI has served as co-chair alongside Globsec and TikTok in a multi-stakeholder forum of over 100 civil society and platform representatives.

- **Elections, Algorithms, and Accountability: Digital Platforms and the 2025 German Federal Elections | 25.02.2025.**
DRI convened a high-level roundtable in Berlin ahead of the German federal elections to examine how digital platforms shape electoral discourse under the Digital Services Act and AI Act. Sixteen policymakers, regulators, researchers, and civil society representatives discussed research findings and advocacy pathways to strengthen DSA enforcement.
- **Modelling Researcher Access to Data Legislation Workshop | 13.03.2025.**
Expert workshop hosted by the Ada Lovelace Institute on legal frameworks for researcher data access across the UK, US, and EU. DRI presented research findings and contributed comparative policy perspectives.
- **2025 Milton Wolf Seminar on Media and Diplomacy | 09.04.2025.**
Vienna-based seminar convening academic and policy experts for in-depth discussions on technology, media, and politics. DRI presented research findings on digital democracy and platform governance.
- **DSA Circle of Friends | 14.04.2025.**
Network meeting of the DSA Research Network addressing freedom of expression, supervision independence, and enforcement of the risk-based approach. Discussions informed stakeholder coordination on DSA implementation.
- **Berlin Independent Tech Researchers' Meetup | 13.05.2025.**
Research professionals' meetup on the evolving digital democracy research landscape, with a focus on assessing the effectiveness of platform mitigation measures. Insights informed future research planning.
- **The DSA in Court: What We Learned from Suing X | 10.07.2025.**
Following the Berlin Regional Court ruling in DRI's case against X, DRI and Gesellschaft für Freiheitsrechte co-hosted a public webinar on implications for researcher data access rights under Article 40(12) DSA. The discussion addressed litigation strategies, enforcement pathways, and civil society use of legal data access mechanisms.
- **Retrospective Insights: Election Monitoring Efforts to Preserve Information Integrity | 04.09.2025.**
DRI convened a roundtable with 28 civil society and academic participants to assess digital democracy developments since 2023 and review findings from six national and European elections. Insights informed a meta-analysis outlining future research and advocacy priorities.
- **The Independent Tech Researchers' Summit | 16–17.09.2025.**
Berlin summit of independent researchers addressing collaboration with platforms, safeguards against researcher retaliation, and strategies for securing data access. DRI shared election monitoring findings and data access challenges.

	<ul style="list-style-type: none"> • #InfluencersAgainstDisinfo: Empowering Online Opinion Leaders to Enhance Democratic Resilience 17–19.09.2025. Berlin event hosted by the Aspen Institute bringing together experts and content creators to address digital communication and disinformation resilience. DRI shared social media monitoring insights and data access concerns. • Data Access Days 25.09.2025. Convening under the DSA40 Collaboratory focused on implementation of the Delegated Act on Data Access. DRI shared operational experiences with platform data access tools and litigation efforts. • TED Webinar: Safeguarding Democracy and Elections in the Age of AI 01.10.2025. Online webinar examining AI’s dual impact on democratic processes, electoral integrity, and governance risks. DRI contributed examples of platform accountability work and multi-stakeholder collaboration. • DisinfoCon 2025 11–12.11.2025. Organised with the Embassy of Canada to Germany and Alliance4Europe, DisinfoCon brought together researchers, journalists, policymakers, and civil society actors to discuss decentralised social media, AI accountability, and disinformation resilience. The event hosted 65 in-person participants in Berlin and 48 online. • <u>DRI Media Coverage 2025.</u> Our research and advocacy efforts garnered significant attention, with our reports and analysis being referenced by leading media outlets such as Politico, Euronews, Reuters, CNN and many more. This media coverage furthers the impact of our work, shaping public discourse and informing key stakeholders—including policymakers, civil society, and the broader public—we continue to drive meaningful conversations on critical issues. 		
SLI 16.1.1 – Numbers of actions as a result of information sharing [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters]		
Data	Nr of actions taken (total)	Type of detected content	Other relevant metrics

Reporting on the service's response during an election

Reporting on the service's response during an election

Threats observed or anticipated at time of reporting:

1. Impersonation and inauthentic accounts and political ads violating platform's policies

DRI used the Rapid Response System to flag coordinated inauthentic behaviour and murky political accounts on TikTok that impersonated candidates and amplified partisan content. We alerted platforms and authorities to networks distorting electoral discourse and violating platform integrity policies.

German elections: The report identified 138 inauthentic TikTok accounts operating ahead of Germany's 2025 elections, most of which promoted or impersonated actors linked to the Alternative für Deutschland and generated disproportionately high engagement compared to accounts tied to other parties. Using tactics such as impersonating figures like Alice Weidel and Björn Höcke, trending hashtags, memes, and AI-generated imagery, these "murky" accounts exposed enforcement gaps under the EU Digital Services Act despite most being removed after researcher reporting.

- [Scroll for a Fake: TikTok Murky Accounts Impersonate German Parties and Politicians Ahead of Elections](#) | 18.02.2025
- [Scroll, Like, Deceive: Murky Political Accounts on TikTok before the German 2025 Elections](#) | 21.03.2025

Polish elections: Analysis of Poland's 2025 presidential election found that a small group of candidates produced over 57% of campaign content, while a study of 5,500+ social media posts revealed uneven reach and unusually rapid audience growth linked to certain far-right actors. Monitoring also identified 145 inauthentic TikTok accounts impersonating candidates and parties, with some profiles amassing hundreds of thousands of followers despite partial platform removals.

- [Unverified and Unchecked: Murky TikTok Accounts in Poland's 2025 Elections](#) | 18.06.2025

Romanian elections: Ahead of Romania's May 2025 presidential election—following the annulment of the November 2024 vote by the Constitutional Court of Romania—monitoring identified 323 murky TikTok accounts impersonating political actors, with 35.2% supporting Călin Georgescu and others mimicking figures such as Elena Lasconi, George Simion, and Nicușor Dan. While Georgescu-linked accounts were most active, pro-Simion profiles achieved the highest engagement, underscoring persistent inauthentic coordinated behaviour despite substantial post-reporting removals by TikTok.

- [323 murky accounts and one denied candidacy: TikTok's role in Romania's 2025 election](#) | 11.06.2025

2. Chatbots misinforming about elections, and prevalence of generative AI in campaigns

Over the past two years, LLM-powered chatbots have grown rapidly and are increasingly integrated into tools like search engines, but DRI studies show they remain unreliable for providing accurate election information. In testing six chatbots for the 2025 **German** federal elections, only Gemini and Copilot fully refrained from giving electoral answers, while others still produced false or partisan responses, highlighting the need for chatbots to consistently direct users to official sources and avoid generating election-related content. Additionally, we observed that analysis of over 53,000 Facebook posts linked

to Alternative für Deutschland ahead of the 2025 election revealed coordinated crisis-focused messaging blaming political rivals, emotionally charged framing of violent incidents, and the use of undisclosed AI-generated imagery to amplify anti-establishment narratives.

- [Inconsistent and Unreliable: Chatbots Provide Inaccurate Information on German Elections](#) | 12.02.2025
- [The AfD on Facebook: Fear, Anti-CDU posts and Abuse of AI](#) | 03.03.2025

3. Toxicity in political speech, disinformation narratives, and far-right online campaigning

Our monitoring of elections in Austria, Germany, and Poland pointed to recurring risks in online political communication, including algorithmic amplification, concentrated campaign activity, and toxic rhetoric.

- [From Hashtags to Votes: Social Media Patterns in Austria's 2024 National Elections](#) | 29.01.2025
- [Filtered for You: Algorithmic Bias on TikTok and Instagram in Germany](#) | 10.04.2025
- [Engagement Wars: Inside the Polish Presidential Campaigns on Social Media.](#) | 30.05.2025
- [Digital Duel: Online Campaign Strategies in Poland's Presidential Runoff](#) | 17.06.2025
- [Algorithms and Agendas: The Digital Fight for Poland's Presidency 2025](#) | 31.07.2025

Mitigations in place – or planned - at time of reporting:

1. **Provided evidence to enforcement authorities on identified threats**
2. **Urged platforms to revise and strengthen their terms and conditions to effectively combat the identified threats.**
3. **Raised awareness about threats and built networks with relevant stakeholders through webinars and roundtables**

Throughout our monitoring of electoral and platform risks in 2025, we engaged with policymakers, researchers, and civil society stakeholders to raise awareness of emerging online threats and strengthen coordinated responses through webinars and roundtables.

- Elections, Algorithms, and Accountability: Digital Platforms and the 2025 German Federal Elections | 25.02.2025
- Retrospective Insights: Election Monitoring Efforts to Preserve Information Integrity | 04.09.2025
- TED Webinar: Safeguarding Democracy and Elections in the Age of AI | 01.10.2025
- DisinfoCon 2025 | 11–12.11.2025