

Code of Conduct on
Disinformation – Report of
Fundación Maldita.es for the
period January 2025 to
December 2025

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Executive summary

In 2025, Fundación Maldita.es continued its work to fight for information integrity and against disinformation through journalism, education, technology, research and policy action.

As part of its work to **empower the European fact-checking community**, Maldita's CEO chairs the governance body of the European Fact-Checking Standards Network (EFCSN), contributing to efforts to strengthen the technical capacity and advocacy skills of smaller fact-checking organisations. In this spirit, Maldita.es has also led or contributed to several collaborative initiatives aimed at improving shared capacity and cross-border responses to disinformation. These included [ATAFIMI](#), a project that brings together 11 fact-checking organisations from Europe and Latin America to identify, analyse, and counter cross-border disinformation campaigns, and [SAFIMI](#), an EU-funded project in collaboration with national partners to protect the Georgian information space against external threats. Maldita.es has also participated in the development of EFCSN's [Prebunking at Scale \(PAS\)](#). PAS is an AI-powered tool built together with more than 40 fact-checking organisations across Europe in an effort to create shared technological infrastructure to track and counter disinformation that travels across borders.

Moreover, to respond to the information needs of citizens, Maldita has maintained its daily fact-checking activity and provided special coverage around events that provoked spikes in disinformation. In 2025 some examples included the [nationwide power outage](#) affecting Spain and Portugal, the [anti-migrant violence in Torre-Pacheco](#), the [conflict in Israel-Iran](#), [Palestine](#) and [Ukraine](#) or the regional elections in [Extremadura](#). A key tool in this regard is Maldita's AI-powered verification bot, a chat-based resource where citizens can send in suspected disinformation and receive fact-checking support. The bot received 32,000 inquiries in 2025 alone, offering a direct window into the narratives circulating among the public, including in private messaging app WhatsApp.

The daily work of Maldita.es' monitoring and investigating teams provides insights into how disinformation harms emerge and spread across platforms. This monitoring helps identify patterns and narratives that often prompt further investigation. In 2025, an [investigation uncovered 1,075 Facebook pages impersonating public transportation systems](#) and promoting scams across over 700 cities worldwide while taking advantage of Meta's ad systems to do so. The ads lured users with offers of free transportation cards and directed them to phishing sites designed to steal people's personal and banking information. In a separate investigation, Maldita detected 49 Youtube channels spreading [AI-generated videos of fake confrontations between European and Spanish politicians](#) and found that many of these videos violated Youtube's policies on unlabeled synthetic content, while fostering political polarization through disinformation. Finally, an investigation in partnership with AI Forensics found that climate [disinformation videos on YouTube and TikTok linked to the Valencia flood](#), a natural disaster that occurred a year prior, remained available on the platforms and were being amplified by the recommender systems. These are examples of investigations that generate evidence that can alert relevant Signatories to potential policy breaches and **monitor the meeting of their obligations under the Code**.

This body of evidence also points to the continued importance of professional fact-checking in the online information environment, a point Maldita.es' work in 2025 consistently reinforced. A report on [fact-checking and Community Notes on X](#) found that fact-checkers are the third most frequently

used global source when users propose notes, and that notes citing fact-checkers tend to become visible faster than notes based on other sources.

Finally, Maldita.es facilitates dialogue among experts and stakeholders working on disinformation. In 2025, this included organising the event [“From Russia with Hoax”](#), which brought together academics, journalists, public authorities, and disinformation specialists to examine Kremlin disinformation strategies. Maldita.es also remained engaged with FIMI ISAC, a network of organisations working to protect democratic societies, institutions, and critical information infrastructures from foreign information manipulation and interference.

About Fundación Maldita.es

Fundación Maldita.es is a non-profit foundation based in Spain that works to strengthen information integrity and counter disinformation through journalism, education, technology, research, and policy. Our multidisciplinary approach combines evidence-based journalism and investigative methods with award-winning technology to support our education, research, and policy efforts. This work is strengthened by a broad international network of citizens, partners, and stakeholders. Our mission is to provide all actors affected—from legislators and digital platforms to journalists, citizens & educators— with tools, capacities, and evidence-based information to make informed decisions, and together, to foster a more resilient, accessible, and trustworthy media & information ecosystem.

VII. Empowering the fact-checking community

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. [change wording if adapted]

Measure 33.1	[insert wording if adapted]	
QRE 33.1.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters] Maldita.es is an active part of the European Fact-Checking Network (EFCSN). Currently holds the chairmanship of the association's governance body. We have updated our methodologies, policies and procedures to make them even more transparent and accessible, in order to be compliant with the EFCSN Code of Standards . Maldita.es has also been a verified signatory of the International Fact-Checking Network (IFCN) Code of Principles since 2018 and has undergone the assessment procedure each year since then. The assessment is accessible here and our declarations on methodology , organisational transparency , and neutrality are also public on our website.	
SLI 33.1.1 - number of European fact-checkers that are IFCN-certified [change wording if adapted]	Methodology of data measurement: We have taken into account fact-checking organisations based in EU Member or Council of Europe states, plus Belarus and Kosovo. For both networks, we have included the status of the organisations as of March 2026.	
	Nr of fact-checkers IFCN-certified	Nr of members of EFCSN
Data	64 signatories 12 organisations under renewal	62 verified members

VIII. Transparency Centre

Commitment 34

To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website. [change wording if adapted]

Measure 34.3	[insert wording if adapted]
Measure 34.4	[insert wording if adapted]

VIII. Transparency Centre	
Commitment 35	
Signatories commit to ensure that the Transparency Centre contains all the relevant information related to the implementation of the Code's Commitments and Measures and that this information is presented in an easy-to-understand manner, per service, and is easily searchable. [change wording if adapted]	
Measure 35.2	[insert wording if adapted]
Measure 35.3	[insert wording if adapted]
Measure 35.4	[insert wording if adapted]

VIII. Transparency Centre	
Commitment 36	
Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner. [change wording if adapted]	
QRE 36.1.1 (for the Commitments 34-36) [insert wording if adapted]	

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. [change wording if adapted]	
Measure 37.1	[insert wording if adapted]
Measure 37.2	[insert wording if adapted]

Measure 37.3	[insert wording if adapted]
Measure 37.4	[insert wording if adapted]
Measure 37.5	[insert wording if adapted]
Measure 37.6	[insert wording if adapted]
QRE 37.6.1 [insert wording if adapted]	<p>Outline relevant actions [suggested character limit: 2000 characters]:</p> <p>Fundación Maldita.es takes part in five different sub-groups within the Task-force: Crisis Response SG (and the Elections Working-Group), Monitoring & Reporting SG, Empowering Fact-checkers SG and Generative AI SG. By attending every meeting of these subgroups, we have shared insights from our daily fight against disinformation, different narratives we encounter and the challenges posed by AI, as well as what we perceive as shortcomings of other signatories when it comes to fighting and measuring disinformation, particularly during crises and elections. Furthermore, we have raised concerns from the fact-checking community and given constant feedback on the decisions that were being taken.</p>

X. Monitoring of Code	
Commitment 38	
<p>The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes to ensure the implementation of their commitments under the Code. [change wording if adapted]</p>	
QRE 38.1.1 [insert wording if adapted]	<p>Outline relevant actions [suggested character limit: 2000 characters]:</p> <p>In order to comply with our commitments under the Code, the entire Public Policy and Institutional Development team is in charge of duties related to both reporting information and engaging with the Task-Force, other signatories and different relevant actors that could contribute to the implementation of the Code. These include contacts with civil society organisations, researchers, public authorities, and online platforms within the Code and also with potential partners that are not yet signatories.</p> <p>Meanwhile, Fundación Maldita's debunking team closely searches for and monitors different narratives and networks that promote disinformation, providing valuable evidence to alert relevant Signatories of potential policy breaches or act as an early-warning system. With the aim of identifying larger trends in misinformation, these observations are also being shared with other independent fact-checking organisations within the IFCN and EFCSN.</p>

X. Monitoring of Code

Commitment 39

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

X. Monitoring of Code

Commitment 40

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

Measure 40.2	[insert wording if adapted]
Measure 40.3	[insert wording if adapted]
Measure 40.4	[insert wording if adapted]
Measure 40.5	[insert wording if adapted]

X. Monitoring of Code

Commitment 42

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

X. Monitoring of Code

Commitment 43

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

Reporting on the service's response during an election

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Elections

Within the scope of Fundación Maldita.es', fact-checking coverage was provided for the regional elections in Extremadura. During 2025, our editorial team has also reported on insights from international electoral dates, such as those of [Germany](#) or [Moldova](#).

Fundación Maldita.es also takes part in [the project "FIMI Defenders for Election Integrity \(FDEI\)"](#) which seeks to address foreign information manipulation and interference (FIMI) during electoral processes in several European countries and has produced several risk assessment and post-election reports that offer valuable information to the community.

Alongside this, we continued to engage with the Task Force Election Working Group to follow the election coverage outside our realm.

Empowering the Fact-Checking Community

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

Compliance with standards (Commitment 33, Measure 33.1)

Description of intervention:

Maldita.es is one of the founders and an active actor of the European Fact-Checking Network (EFCSN). Currently holds the chairmanship of the association's governance body. We have updated our methodologies, policies and procedures to make them even more transparent and accessible, in order to be compliant with the [EFCSN Code of Standards](#).

Maldita.es has also been a verified signatory of the International Fact-Checking Network (IFCN) Code of Principles since 2018 and has undergone the assessment procedure each year since then. The assessment is accessible [here](#) and our declarations on [methodology](#), [organisational transparency](#), and [neutrality](#) are also public on our website.