

Code of Practice on  
Disinformation – Report of  
NewsGuard for the period  
January 1, 2025–December  
31, 2025

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## Executive summary

In June 2022, NewsGuard signed onto all the Code of Practice's measures that are relevant to its services, committing to maintain its journalistic practices, which include an independent, unbiased, and apolitical approach; full transparency on its methodology; and providing publishers a 'right to be heard' by calling for comment when publishers are deemed to fail certain criteria. Furthermore, NewsGuard also committed to continue to strengthen its media-literacy efforts with public libraries and schools to help users develop their critical thinking and online awareness through its browser-extension tool.

Here is a summary of how we implemented our commitments in 2025.

### 1. EMPOWERING USERS

NewsGuard's Reliability Ratings are based on nine apolitical and basic journalistic criteria that assess the credibility and transparency of a news or information site. Our nine criteria are applied equally to all news sites, regardless of their size or political orientation — from mainstream media outlets to small blogs — while allowing all sites to exercise their right to be heard.

Our criteria are basic journalistic principles and are inherently apolitical. They are also completely transparent and [explained](#) in great detail on our website in several languages spoken in the EU (namely English, French, German and Italian) along with the relative weighting of each criterion, depending on its importance.

Our rating process is designed to ensure our criteria are applied in an unbiased manner. After an analyst produces a first rating, with an associated Nutrition Label explaining in detail why he or she arrived at such a rating, the analysis is edited by at least two editors. Then, if any doubt remains about how to apply a specific criterion, the rating is discussed during a full staff meeting hosted by our two co-CEOs and co-Editors-in-Chief, Steven Brill and Gordon Crovitz. Over the years, this process has led NewsGuard to assign high ratings and poor ratings to sites of all political leanings.

To ensure fairness, publishers are also put at the center of our rating process and given a chance to comment whenever our team flags an issue with the credibility or transparency of their site. We believe this publisher right of reply is fundamental to fair and accurate ratings.

For the sake of accountability, readers can see the credentials and backgrounds of everyone responsible for every NewsGuard Reliability Rating and Nutrition Label that they read.

Because our tools are meant to empower users so that they can make informed decisions on which sources to trust and which to be wary of, we also allow users to submit suggestions of sources to rate, if we have not yet rated them, and to send feedback on existing ratings. All inbound messages are reviewed by our team.

Finally, to ensure complete independence, we accept no fees from news websites to rate them. Our revenue comes from license fees that platforms, ad agencies, brands, media monitoring companies, AI companies, government entities and researchers — among other groups — pay to use our data. News consumers are able to access NewsGuard ratings through our licensees as well as directly from NewsGuard's browser extension. Companies providing internet browsers, search, social media and other services make our ratings available to their users to empower them with information about the nature of news sources they see online. Individuals can also subscribe to our ratings through a browser extension and mobile version.

At a time when generative AI models often “hallucinate” and create and spread false claims about topics in the news, NewsGuard data also protects news consumers when they use large-language models, and provide product teams and trust & safety teams within generative AI companies with protections to ensure that their AI systems are reliable and that risks are mitigated. This protects news consumers from being confronted to false claims in AI responses to prompts and also prevents malign actors running disinformation operations, including for the governments of Russia, China and Iran, from abusing AI models to spread their narratives and inundate the responses of Western chatbots.

In 2025, NewsGuard also provided its media literacy browser extension for free to approximately 270 public libraries in the EU (in Italy, France, Germany and Slovenia) helping thousands of patrons navigate the internet more safely and access additional information and context on the sources of news and information they encounter online.

From January 1, 2025 to December 31, 2025, NewsGuard participated in many media literacy seminars, awareness-raising events, and discussions with misinformation and disinformation experts in the following EU countries: Belgium, France, Germany, Ireland, Italy, Spain and Norway. These events reached a total of approximately 5,000 participants, including educators and librarians who in turn could reach hundreds of students and library users.

## **2. SUPPORTING TRUSTWORTHY JOURNALISM AND DEMONETIZING FALSE CLAIMS AND STATE-SPONSORED DISINFORMATION**

NewsGuard’s brand safety service, BrandGuard, enables brands to invest in ad inventory on high quality news sites that publish trustworthy journalism — and avoid placing ads on websites that repeatedly publish false claims, state-sponsored propaganda, undisclosed AI-generated content, or unreliable news. Advertisers using BrandGuard can access NewsGuard’s ratings to target or avoid ad placements based on their brand values and safety guidelines, enabling each brand to tailor its approach to advertising on news while enforcing the publisher’s right to be heard.

BrandGuard is powered entirely by NewsGuard’s Reliability Ratings of news and information websites, which are compiled by a team of experienced journalists and editors based on nine apolitical journalistic criteria. Based on the criteria, each publisher receives an overall rating level ranging from “High Credibility” to “Credible with Exceptions” to “Proceed with Caution,” along with a 0-100 reliability score and an assessment on each of the nine criteria. Our rigorous rating process is explained in great detail on our website, on a page called [“Website Rating Process and Criteria”](#) (which is available in several EU languages: English, French, Italian and German.)

As the page describes, our process is transparent and accountable to everyone involved — including publishers, advertisers, and the general public. Each criterion is defined in significant detail, with numerous examples of how a publisher would pass or fail the criterion. Each site’s score is derived entirely from our assessments of those criteria, which are each assigned a specific number of points as outlined on our website. For each rating, we provide a detailed written Nutrition Label report that explains why NewsGuard made its determination on each of the criteria, provides evidence and examples to back up its assessments, and includes any relevant comments from the publisher. Before publishing a rating or update, we always seek feedback from publishers that fail any of our criteria. We hold ourselves to the same standards we expect of the websites we rate, which means transparently conducting responsible journalism and allowing publishers to exercise their right to reply. Each assessment of a website is made public via NewsGuard’s browser extension, which is available for public subscription. NewsGuard subscribers and rated publishers can read NewsGuard’s

detailed analyses, called “Nutrition Labels,” which explain why NewsGuard made its determination on each of the criteria, provide evidence and examples to back up its assessments, and include any relevant comments from the publisher. Additionally, we also invite publishers who disagree with our rating to provide feedback [on a dedicated page of our website](#).

This transparent process is documented on [NewsGuard’s website](#) and in our Nutrition Labels, and allows publishers not only the right of reply — but also an opportunity to improve. More than 2,230 websites rated by NewsGuard have taken steps to improve editorial practices after being contacted by our team during the rating process — resulting in improved ratings and scores and, in some cases, leading advertisers to monetize their websites.

To ensure our process remains strictly apolitical, NewsGuard relies on apolitical criteria when rating a site (e.g. a corrections policy cannot be partisan, as there is no conservative or progressive way to regularly publish corrections) and carries out a manual and rigorous editing process involving approximately five journalists and editors per website rating, ensuring no rating is the assessment of a single person. The most debated analyses undergo a final review step in which it is shared with the full team of NewsGuard analysts, including the two co-CEOs, to raise any issues and ensure consistency.

### **3. EMPOWERING THE RESEARCH COMMUNITY**

As a member of the Italian Digital Media Observatory since 2021, NewsGuard regularly publishes its content and analysis on disinformation in Italy and in Europe on IDMO’s [portal](#), contributing to the consortium’s media literacy efforts.

NewsGuard has various partnerships and collaborations with research institutions and universities that study disinformation, such as La Sapienza University in Rome, Ca’ Foscari University in Venice, Carlo Bo University in Urbino, University of Salerno, the European University Institute in Florence, the Italian National Research Council, IMT School in Lucca, the Universität der Bundeswehr München and the German Max-Planck-Institute in Germany and the French National Research Institute for Digital Science and Technology or Inria in France.

In 2025, NewsGuard’s team produced regular newsletters called Reality Check covering false claims and disinformation online with exclusive data from nine countries including four Member States (France, Italy, Austria, and Germany). NewsGuard also published False Claims tracking centers on the year’s most notable news events, to monitor the false claims they generated, and document their origin and spread. These included an Israel-Iran War Tracker, German Elections Misinformation Tracker, and Southern California Wildfire Tracker.

Our previous tracking centers on Israel-Hamas War False Claims, Russia-Ukraine War Disinformation and on AI-enabled False Claims were also regularly updated throughout the year.

These reports are distributed in all the countries NewsGuard operates in and are available for free on NewsGuard’s website in English, French, Italian, and German. NewsGuard also continues to publish a State-Sponsored Disinformation Risk Briefing focused on hostile information operations by the governments of Russia, China and Iran targeting citizens in the EU and other democracies.

NewsGuard also regularly publishes [Special Reports](#) on disinformation focusing on different topics, trends, and platforms (17 in total in 2025), in addition to audits of the top 11 chatbots, which we started publishing in July 2024 (8 in total in 2025, including one testing responses in French, English, German, Italian, and Spanish, among others.)

NewsGuard’s [white paper](#), “Fighting Misinformation with Journalism, not Algorithms,” which is published on our website, outlines independent research on the effect of using human-curated news

reliability ratings to mitigate false news, some of which has been conducted by leading academic institutions and other top scholars using NewsGuard's Reliability Ratings dataset.

## Guidelines for filling out the report

Reports are detailing how signatories have implemented their Commitments under the Code and 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.

### Reporting period

The reporting period to be covered in the reports is 12 months (edit reporting period) for signatories who are not offering very large online platform services. Signatories shall submit reports outlining policy updates and actions taken to implement the Commitments and Measures they signed up to under the Code. All data and policy updates should be reported for 12 months period from the submission of last reports.

### Adjusting the reporting template

Signatories who are not offering very large online platform services can adapt the template to specific commitments and measures they subscribed to. This may include adapted wording for commitments, measures, QREs and SLIs. Relevant signatories will report only on commitments and measures they subscribed to and provide Member State-level data only if feasible.

### Reporting per Service

When filling in a report for several services, use colour codes to clearly distinguish between services. At the beginning of the report, clarify what colour is used for which service.

### Reporting in text form

Reporting in the form of written text is required for several parts of the report. Most of them are accompanied by a target character limit. Please stick to the target character limit as much as possible. We encourage you to use bullet points and short sentences. When providing information to the QRE, please make sure that your answer covers all the elements of the associated commitment and measure. Links should only be used to provide examples or to illustrate the point. They should not be used to replace explanations or to provide data in the forms. All relevant explanations and data must be included in the report directly, in written form.

### Reporting SLIs and data

Reporting on SLIs requires quantitative information to be reported on in this harmonised reporting template.

- Where relevant and feasible, SLIs should be reported on per Member State.
- If no data is available on Member State level, SLIs might, instead, be exceptionally reported on per language. (NB that signatories agreed to revisit this issue after the first reporting, to ensure harmonised and meaningful reporting.)
- Please report data in the format provided by the harmonised reporting template, not through external links. Please use the Member State/language template provided in the harmonised reporting template. Where the table asks for "Other relevant metrics", please name the metric that you would like to report on in addition to the ones already provided. You may include more than the number of additional fields provided where necessary; in that case, please adjust the table as needed.
- Please contextualize all data as much as possible, i.e. include baseline quantitative information that will help contextualize the SLIs (e.g. number of pieces of content labelled out of what volume of content).
- If there are no relevant metrics to report on, please leave the respective columns blank.

### Reporting on TTPs

If subscribed to Commitment 14, Integrity of Services, we ask you to report on each identified TTP individually. The number of identified TTPs may vary per service. Where more than one TTP are reported under the same action, clarify the reasoning in the methodology. Where input is not provided, keep the placeholder for the relevant TTP and explain reasons and planned remedial action. Additionally, as with all other SLIs, data can be provided per Member State for each individual TTP.

### Missing Data

In case that at the time of reporting there is no data available yet, the data is insufficient, or the methodology is lacking, please outline in the dedicated field (i.e. in the field about further implementation measures planned) how this will be addressed over the upcoming six months, being as specific as possible.

Signatories are encouraged to provide insights about the data/numbers they provide by inserting possible explanations in the boxes of the template "*Methodology of data measurement & insights on data provided*". This should aim to explain the why of what is being reported, for instance – *Are there trends or curiosities that could*

require or use contextual explanation? What may be driving the change or the difference in the number? Please also indicate inconsistencies or gaps regarding methodology in the dedicated box.

## Attachments

We ask you not to enclose any additional attachments to the harmonised reporting template.

## Crisis and elections reporting template

Relevant signatories are asked to provide proportionate and appropriate information and data during a period of crisis and during an election. Reporting is a part of a special chapter at the end of the harmonised reporting template and should follow the guidelines:

- The reporting of signatories' actions should be as specific to the particular crisis or election reported on as possible. To this extent, the rows on "Specific Action[s]" should be filled in with actions that are either put in place specifically for a particular event (for example a media literacy campaign on disinformation related to the Ukraine war, an information panel for the elections), or to explain in more detail how an action that forms part of the service's general approach to implementing the Code is implemented in the specific context of the crisis or election reported on (for example, what types of narratives in a particular election/crisis would fall into scope of a particular policy of the service, what forms of advertising are ineligible).
- Regarding elections, signatories are expected to provide specific information on their **experience with the RRS for FR and RO elections**. This can be included in the first two rows ("Threats observed..." / "Mitigations in place ..."). In addition, **regardless of the RRS activation, signatories should report on relevant actions in place for elections at national level** (parliamentary/presidential) in EU Member States during the reporting period – specifying the country(ies) and election(s).
- Signatories who are not offering very large online platform services and who follow the invitation to report on their specific actions for a particular election or crisis may adapt the reporting template as follows:
  - They may remove the "Policies and Terms and Conditions" section of the template, or use it to report on any important changes in their internal rules applicable to a particular election or crisis (for example, a change in editorial guidelines for fact-checkers specific to the particular election or crisis)
  - They may remove any Chapter Section of the Reporting Template (Scrutiny of Ads Placement, Political Advertising, Integrity of Services etc.) that is not relevant to their activities
- The harmonised reporting template should be filled in by adding additional rows for each item reported on. This means that rather than combined/bulk reporting such as "Depending on severity of violation, we demote or remove content based on policies X, Y, Z", there should be individual rows stating for example "Under Policy X, content is demoted or removed based on severity", "Under Policy Y, content [...]" etc.
- The rows should be colour-coded to indicate which service is being reported on, using the same colour code as for the overall harmonised reporting template.

Reporting should be brief and to the point, with a suggested character limit entry of 2000 characters.

## Uploading data to the Transparency Centre

The reports should be submitted to the Commission in the form of the pdf via e-mail to the address CNECT COP TASK FORCE [CNECT-COP-TASK-FORCE@ec.europa.eu](mailto:CNECT-COP-TASK-FORCE@ec.europa.eu) within the agreed deadline. Signatories will upload all data from the harmonised reporting template to the Transparency Centre, allowing easy data access and filtering within the agreed deadline. It is the responsibility of the signatories to ensure that the uploading takes place and is executed on time. Signatories are also responsible to ensure that the Transparency Centre is operational and functional by the time of the reports' submission that the data from the reports are uploaded and made accessible in the Transparency Centre within the above deadline, and that users are able to read, search, filter and download data as needed in a user-friendly way and format.

## 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.

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| <p>Measure 1.6</p>  | <p>Relevant Signatories will advance the development, improve the availability, and take practical steps to advance the use of brand safety tools and partnerships, with the following goals:</p> <ul style="list-style-type: none"> <li>- To the degree commercially viable, relevant Signatories will provide options to integrate information and analysis from source-raters, services that provide indicators of trustworthiness, fact-checkers, researchers or other relevant stakeholders providing information e.g., on the sources of Disinformation campaigns to help inform decisions on ad placement by ad buyers, namely advertisers and their agencies.</li> <li>- Advertisers, agencies, ad tech companies, and media platforms and publishers will take effective and reasonable steps to integrate the use of brand safety tools throughout the media planning, buying and reporting process, to avoid the placement of their advertising next to Disinformation content and/or in places or sources that repeatedly publish Disinformation.</li> <li>- Brand safety tool providers and rating services who categorize content and domains will provide reasonable transparency about the processes they use, insofar that they do not release commercially sensitive information or divulge trade secrets, and that they establish a mechanism for customer feedback and appeal.</li> </ul>   |
| <p><b>QRE 1.6.3</b><br/>Signatories that provide brand safety tools will outline how they are ensuring transparency and appealability about their processes and outcomes.</p> | <p>NewsGuard’s brand safety service, BrandGuard, enables brands to invest in ad inventory on news sites that publish trustworthy journalism, and avoid placing ads on sites that repeatedly publish false claims or state-sponsored disinformation. BrandGuard offers access to its ratings, enabling brands to tailor their approach to account for their values while enforcing the publisher’s right to be heard when deciding where to place their ads.</p> <p>BrandGuard’s solutions are based entirely on NewsGuard’s Reliability Ratings of news and information websites, which are compiled by a team of experienced journalists based on nine apolitical journalistic criteria. Our rigorous rating process is explained in detail on our website, <a href="#">on a page called “Website Rating Process and Criteria.”</a></p> <p>As the page describes, our process is transparent and accountable to everyone involved—including publishers, advertisers, and the general public. Each criterion is defined at length, with numerous examples of how a publisher would pass or fail the criterion. For each rating, we provide a written Nutrition Label report that explains why NewsGuard made its determination on each of the criteria.</p> <p>Unlike other brand safety providers that rely on black box algorithms, NewsGuard’s journalists contact any publisher that fails any of the nine criteria before publishing a rating. Publishers may address any issues to increase their score or provide comments, which are included in the Nutrition Label report so that advertisers may judge for themselves whether the publisher should be monetized.</p> <p>This transparent process allows publishers not only the right of reply – but an opportunity to improve. More than 2,230 websites have taken steps to improve editorial practices after being contacted by our team – leading advertisers in some cases to monetize their websites.</p> |

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| <p><b>QRE 1.6.4</b> Relevant Signatories that rate sources to determine if they persistently publish Disinformation shall provide reasonable information on the criteria under which websites are rated, make public the assessment of the relevant criteria relating to Disinformation, operate in an apolitical manner and give publishers the right to reply before ratings are published.</p> | <p>NewsGuard’s ratings for news websites are based on nine apolitical criteria that assess the website’s credibility and transparency. Each criterion is worth a certain number of points out of 100, weighted based on importance. All criteria are pass-fail, meaning that a site either receives all of the points associated with the criterion or receives no points for that criterion, and are applied in a way that ensures a publisher’s right to be heard.</p> <p>All of our criteria and the associated points are publicly available <a href="#">on a page of our website called “Website Rating Process and Criteria”</a> that provides a detailed explanation of each criterion and lists examples of reasons that a site might pass or fail this criterion. To ensure our process remains strictly apolitical, NewsGuard relies on apolitical criteria when rating a site and carries out a manual and rigorous editing process involving approximately five journalists and editors per website rating, ensuring no rating is the assessment of a single person. The most debated analyses undergo a final review step in which it is shared with the full team of NewsGuard analysts, including the two co-CEOs, to raise any issues and ensure consistency.</p> <p>Before publishing a rating or update, we always seek feedback from publishers that fail any of our criteria. Each assessment of a website is made public via NewsGuard’s browser extension, which is available for public subscription. NewsGuard subscribers and rated publishers can read NewsGuard’s detailed analyses, called “Nutrition Labels,” which explain why NewsGuard made its determination on each of the criteria, provide evidence and examples to back up its assessments, and include any relevant comments from the publisher. Additionally, we also invite publishers who disagree with our rating to provide feedback <a href="#">on a dedicated page of our website</a>.</p> |
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| <h2>V. Empowering Users</h2>   |   |
| <h3>Commitment 17</h3>   |   |
| <p>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.</p> |   |
| <p>Measure 17.2</p>  | <p>Relevant Signatories will develop, promote and/or support or continue to run activities to improve media literacy and critical thinking such as campaigns to raise awareness about Disinformation, as well as the TTPs that are being used by malicious actors, among the general public across the European Union, also considering the involvement of vulnerable communities.</p>  |
| <p><b>QRE 17.2.1</b> Relevant Signatories will describe the activities they launch or support and the Member States they target and reach. Relevant signatories will further report on actions taken to promote the campaigns to their user base per Member States targeted.</p>                                   | <p>In 2025, NewsGuard participated in numerous media literacy events with journalists, librarians, teachers and citizens on topics ranging from how AI is being used in disinformation campaigns, to spotting unreliable sources. The events took place in several Member States: France, Italy, and Germany.</p> <p>Such events have included lessons on AI-powered false claims and disinformation for students at Luiss University, LUMSA University, Salerno University, and La Sapienza University in Italy, HAW Hamburg (Germany), the Ecole Normale Supérieure and the ISJ journalism school (France) and webinars with school teachers and students in Italy.</p> |

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|  | <p>Throughout the year, NewsGuard was regularly involved in initiatives led by IDMO, the Italian Digital Media Observatory, of which NewsGuard is a member.</p> <p>Our editors have also spoken at conferences to raise awareness on specific issues related to mis- and disinformation, in several Member States, including Belgium, France, Germany, Ireland, Italy, Spain and Norway. These events included a panel titled "Reinforcing the reliability of information and journalism" organized by the Swiss presidency of the Council of Europe, a keynote on the risks of generative AI at Italy's AI week; a keynote at the Euro-Mediterranean Youth Summit organized by the European Youth Parliament in Malaga; and a presentation at the yearly JRC DISINFO "Defend European Democracy" workshop, "Weaponisation of AI to Create and Spread Disinformation."</p> <p>In 2025, NewsGuard also continued providing its browser extension for free to approximately 270 public libraries in Italy, France, Germany and Slovenia.</p> |                           |                           |  |                                 |
| <p><b>SLI 17.2.1 – actions enforcing policies above</b> Relevant Signatories report on number of media literacy and awareness raising activities organized and or participated in and will share quantitative information pertinent to show the effects of the campaigns they build or support at the Member State level (for instance: list of Member States where those activities took place; reach of campaigns; engagement these activities have generated; number of interactions with online assets; number of participants).</p> | <p>In 2025, NewsGuard participated in 21 media literacy seminars and awareness raising events in France, Italy, and Germany. These events reached a total number of approximately 892 participants, including educators and librarians who in turn could reach hundreds of students and library users. NewsGuard also participated in 41 speaking engagements in Italy, France, Belgium, Ireland, Portugal, and Norway, reaching more than 4,120 attendees.</p>  |                           |                           |  |                                 |
|  | <p>Nr of media literacy/ awareness raising activities organised/ participated in</p>   | <p>Reach of campaigns</p> | <p>Nr of participants</p> | <p>Nr of interactions with online assets</p> | <p>Nr of participants (etc)</p> |
| <p><b>21 media literacy seminars and awareness raising events</b></p>  | <p>Seminar on disinformation and AI for a high school in Portogruaro (Italy)</p>   |                           | <p>About 80 students</p>  |  |                                 |
|  | <p>Seminar on disinformation and AI for a high school in Pordenone (Italy)</p>   |                           | <p>About 150 students</p> |  |                                 |
|  | <p>Seminar on NewsGuard's approach to fighting false claims for students at The Ecole</p>  |                           | <p>2 students</p>         |  |                                 |

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|  | Normale Supérieure<br>(Paris, France)  |  |                      |  |  |
|  | Seminar on<br>disinformation and AI<br>for a high school in<br>Monza (Italy)                               |  | About 80<br>students |  |  |
|  | Lecture on<br>disinformation and AI<br>for the students of<br>LUISS University<br>(Italy)                  |  | About 10<br>students |  |  |
|  | Lecture for the<br>students of La<br>Sapienza University<br>(Italy)  |  | About 30<br>students |  |  |
|  | Lecture for CICAP,<br>the Italian Committee<br>for the Investigation of<br>Pseudoscience<br>Claims (Italy) |  | About 30 people      |  |  |
|  | Workshop on<br>disinformation for a<br>primary school in<br>Portogruaro (Italy)                            |  | About 40<br>students |  |  |
|  | Lecture for the<br>students of LUISS<br>University (Italy)   |  | About 20<br>students |  |  |
|  | Seminar on<br>disinformation and AI<br>for a high school in  |  | About 50<br>students |  |  |

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|  | Modena (Italy)  |  |                   |  |  |
|  | Seminar on disinformation and AI for a high school in Portogruaro (Italy)                                     |  | About 30 students |  |  |
|  | Lecture for the students of La Sapienza University (Italy)  |  | About 20 students |  |  |
|  | Lecture on AI for the students at LUMSA University - Summer School of Artificial Intelligence in Rome (Italy) |  | 33 students       |  |  |
|  | Lecture for the Italian Society for International Organization (SIOI) in Rome (Italy)                         |  | 45 students       |  |  |
|  | Lecture for the students of Salerno University (Italy)  |  | 20 students       |  |  |
|  | Lecture on NewsGuard approach to fighting false claims for students at HAW Hamburg                            |  | About 50 students |  |  |
|  | Class on "Fact-checking,  |  | 12 students       |  |  |

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|  | prebunking and source evaluation" at the ISFJ Journalism School in Lyon (France)                             |  |                   |  |  |
|  | Lecture on AI and false claims at LUMSA (Italy) - School of Economics and Management of Publishing Companies |  | About 20 students |  |  |
|  | Lecture for the students of La Sapienza University (Italy) - International Journalism                        |  | About 50 students |  |  |
|  | Lecture on AI and false claims at LUMSA/UNICRI - Summer School on AI, Ethics and Human Rights (Italy)        |  | About 40 students |  |  |
|  | Seminar on disinformation and AI for a high school in Portogruaro (Italy)                                    |  | About 80 students |  |  |
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| 41 speaking engagements | Roundtable on AI, opinion and truth organized by H/Advisors, a strategic advisory group for cross border communications, ahead of the AI Action Summit (Paris, France) |  | About 150 people                      |  |  |
|                         | Roundtable called "Exploring the role of AI in FIMI", organized by France's Viginum as part of the AI Action Summit (Paris, France)                                    |  | About 300 people                      |  |  |
|                         | Panel on disinformation risks for brands organized by Competence Communication (Italy)   |  | 20 people in person + about 20 online |  |  |
|                         | Webinar for educators (Repubblica Digitale - IDMO activity) - NewsGuard's approach to fight disinfo (Italy)  |  | 23 educators                          |  |  |
|                         | Paris Defence and  |  | About 120                             |  |  |

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|  | Strategy Forum, roundtable on the financing of disinformation (Paris, France)   |  | people            |  |  |
|  | Panel on disinformation for schools (Repubblica Digitale - IDMO + Minister for Technological Innovation and Digital Transition) - NewsGuard's approach to fight disinfo (Italy) |  | About 50 students |  |  |
|  | Keynote at Itinerari Previdenziali's Conference - NewsGuard's approach to fight disinfo (Italy)   |  | About 50 people   |  |  |
|  | STRATCOM - Panel on disinfo on Russia-Ukraine war (Russian propaganda and AI) (Italy)   |  | About 20 experts  |  |  |
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|  | "Reinforcing the reliability of information and   |  | 80                |  |  |

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|  | journalism: the actions of the Council of Europe against disinformation", roundtable organized by the Swiss presidency of the Council of Europe (Strasbourg, France) |  |                 |  |  |
|  | International Journalism Festival in Perugia - Panel discussion on disinfo and AI (Italy)  |  | About 50 people |  |  |
|  | Webinar for educators (IDMO activity) - NewsGuard's approach to fight disinfo (Italy)  |  | 48 people       |  |  |
|  | Presentation Trust & Safety Summit 2025 (Dublin, Ireland): Breaking AI's Misinformation Cycle: A Global Language Lens.   |  | About 50 people |  |  |
|  | Panel Trust & Safety Summit 2025 (Dublin, Ireland): How dark design patterns and misinformation tactics disproportionately   |  | About 80 people |  |  |

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|  | harm vulnerable users online.   |  |                                  |  |  |
|  | AI WEEK - Keynote on AI and disinformation (Italy)  |  | About 600 people + online        |  |  |
|  | Panel on AI and disinfo - event for schools organized by the European Parliament (Italy)  |  | About 110 students + podcast     |  |  |
|  | "Defend information integrity in Europe", roundtable organized by the Sunstorm Foundation (Paris, France)                                   |  | About 50                         |  |  |
|  | "AI in questions, questions to AI", mock trial against AI at Paris museum Beaubourg (Paris, France)   |  | About 70                         |  |  |
|  | Presentation on "Russian disinformation campaigns undermining European support for Ukraine" at the EU Parliament's Special committee on the |  | About 50 MPs + online attendance |  |  |

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|  | European Democracy Shield (EUDS) (Brussels, Belgium)  |  |   |  |  |
|  | Presentation on "Russian influence on Western AI chatbots" at the CoP Plenary Assembly (Brussels, Belgium)                                  |  | About 50 people + online                          |  |  |
|  | Presentation on "AI and disinformation: countering the threats to democratic dialogue" at the Internet Governance Forum (Lillstrom, Norway) |  | About 60 people in person + online attendees, too |  |  |
|  | Keynote at the International Affairs Institute Annual Conference (Italy)  |  | About 50 people                                   |  |  |
|  | Training course for Italian journalists organized with the EU Commission (talk about disinfo and the EU) (Italy)                            |  | About 30 journalists                              |  |  |
|  | Panel at Itinerari Previdenziali's Conference - "Short- and long-term   |  | About 50 people working in Public Administration  |  |  |

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|  | volatility drivers: geopolitics, disinformation and climate change" (Valencia, Spain)  |  |  |  |  |
|  | Joint Research Centre Annual Disinformation Workshop "Defending European Democracy" - speaker in the session "Weaponisation of AI to Create and Spread Disinformation" - (Brussels, Belgium) |  | About 70 people (EU representatives, academics, disinfo experts) |  |  |
|  | Roundtable titled "When information becomes a weapon: what safeguards exist for free societies?", organized by France's ESCP business school alumni defence group (Paris, France)            |  | About 70   |  |  |
|  | Trieste Next Festival - Panel on Communicating the EU through Social Media and Artificial Intelligence (Italy)   |  | About 50 people  |  |  |

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|  | Keynote at the Journalism Festival in Dobbiaco "Regaining trust: media and society to escape the disinformation trap" - (Italy)  |  | About 60 people  |  |  |
|  | Presentation on "AI & algorithmic persuasion versus democracy" at an academic conference organized by France's National Conservatory of Arts and Crafts. (Paris, France) |  | About 150 people |  |  |
|  | Conference in Cagliari organized by La Sapienza University - (Italy)   |  | About 20 people  |  |  |
|  | Panel discussion at the Digital Innovation Days in Milan (Milan, Italy)  |  | About 150 people |  |  |
|  | Talk on disinformation at the event "A riskier world, a changing world" by think tank Orizzonti Politici (Italy)   |  | About 20 people  |  |  |
|  | European Parliament  |  | About 90 high    |  |  |

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|  | Ambassador School Programme event. Three classes on false claims for students from Italy, Malta and Cyprus (Brussels, Belgium)           |  | school students                                 |  |  |
|  | Keynote at the Euro-Mediterranean Youth Summit organized by the European Youth Parliament (EYP) (Malaga, Spain)                          |  | About 70 people                                 |  |  |
|  | IDMO activity - lesson on disinformation and AI - language ITA   |  | About 750 students                              |  |  |
|  | UN Peace Operations - Community of Practice webinar for UN staff from field missions including in Europe and headquarters - language ENG |  | 28 UN staffers from Europe and other continents |  |  |

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|  | Italian Committee for the Investigation of Pseudoscience Claims' Festival (Italy)   |  | About 150 people                     |  |  |
|  | Presentation on brand information threats faced by brands, at the quarterly Internal committee on reputation risks of Axa France.   |  | About 105 people                     |  |  |
|  | Presentation on the evolution of Russian influence campaigns with AI for a seminar on the History of influence campaigns in the 20th and 21st centuries, organized by the School for Advanced Studies in the Social Sciences (EHESS, Paris, France) |  | About 20 people in person and online |  |  |

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|              | Roundtable on the reputation risks that mis- and disinformation represent for brands, as part of French insurance company Axa's communication seminar) (Milan, Italy)  |  | About 80 people   |  |  |
|              | Job&Orienta - National orientation and career fair for high school students (Verona, Italy)  |  | About 40 students |  |  |
|              | Presentation titled "Analysis of foreign influence in conversational AI systems - Russian examples", at the AI and Society Institute (Paris, France)   |  | 16 experts        |  |  |
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| Measure 17.3 | For both of the above Measures, and in order to build on the expertise of media literacy experts in the design, implementation, and impact measurement of tools, relevant Signatories will partner or consult with media |  |                   |  |  |

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|   | literacy experts in the EU, including for instance the Commission’s Media Literacy Expert Group, ERGA’s Media Literacy Action Group, EDMO, its country-specific branches, or relevant Member State universities or organizations that have relevant expertise.  |
| <b>QRE 17.3.1</b> Relevant Signatories will describe how they involved and partnered with media literacy experts for the purposes of all Measures in this Commitment. | <p>Through the Italian Digital Media Observatory’s <a href="#">portal</a>, NewsGuard regularly makes its content and analyses on disinformation in Italy and in Europe public, contributing to the consortium’s media literacy efforts. NewsGuard has various partnerships and collaborations with research institutions and universities that study disinformation, such as La Sapienza University in Rome, Ca’ Foscari University in Venice, Carlo Bo University in Urbino, University of Salerno, the European University Institute in Florence, the Italian National Research Council, IMT School in Lucca, the Universität der Bundeswehr München and the Max-Planck-Institute in Germany, as well as the French National Research Institute for Digital Science and Technology (Inria).</p> <p>A 2024 study published in the “Journal of Quantitative Description: Digital Media” examined the use of NewsGuard’s Reliability Ratings in academic research. The paper—authored by researchers from TU Graz, the University of Vienna, the Medical University of Vienna, and RWTH Aachen University—concluded that NewsGuard has become the most widely used and comprehensive dataset in this space, using a rigorous and transparent methodology, without exhibiting any political bias.</p> |

## 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. [change wording if adapted]

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| Measure 22.4   | Relevant Signatories providing trustworthiness indicators will ensure that information sources are being reviewed in a transparent, apolitical, unbiased, and independent manner, applying fully disclosed criteria equally to all sources and allowing independent audits by independent regulatory authorities or other competent bodies.  |
| <b>QRE 22.4.1</b> Relevant Signatories will provide details of the basic criteria they use to review information sources and disclose relevant safeguards put in place to ensure that their services are apolitical, unbiased, and independent. They will provide examples of how these are applied equally to a representative range of different publishers. Each analysis will indicate who contributed to assessing the source, or which certification body assessed the source. | <p>Our ratings are based on nine apolitical and basic journalistic criteria that refer to the credibility and transparency of a news or information site. Our nine criteria are applied equally to all news sites, no matter their size or political orientation, from mainstream media outlets to small blogs, while allowing all sites to exert their right to be heard.</p> <p>Our criteria are basic journalistic principles and are inherently apolitical. They are also completely transparent and <a href="#">explained</a> in great detail on our website, along with the relative weighting of each criterion, depending on its importance.</p> |

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|   | <p>Our rating process is designed to ensure our criteria are applied in an unbiased manner. After an analyst produces a first rating, with an associated Nutrition Label explaining in detail why he or she arrived at such a rating, the analysis is edited by at least two editors. Then, if any doubt remains about how to apply a specific criterion, it is discussed during a full staff meeting hosted by our two co-CEOs and co-Editors-in-Chief, Steven Brill and Gordon Crovitz. Over the years, this process has led NewsGuard to assign high ratings and poor ratings to sites of all political leanings.</p> <p>To ensure fairness, publishers are also put at the center of our rating process and given a chance to comment whenever our team flags an issue with the credibility or transparency of their site.</p> <p>For the sake of accountability, readers can see the credentials and backgrounds of everyone responsible for every NewsGuard Reliability Rating and Nutrition Label that they read.</p> <p>We also allow users to submit suggestions of sources to rate, if we have not yet rated them, and to send feedback on existing ratings.</p> <p>Finally, to ensure complete independence, we accept no fees from websites for rating them. Our revenue comes from license fees that platforms, ad agencies, brands, media monitoring companies, AI companies, and researchers – among other groups – pay to use our data.</p> |
| Measure 22.5  | <p>Relevant Signatories providing trustworthiness indicators will provide compliance and correction mechanisms and respect the right of publishers to be heard, including to engage in the assessment process before indicators are applied and to have their responses available to consumers after assessments are published.</p>   |
| <p><b>QRE 22.5.1</b> Relevant Signatories will publish regular corrections on their ratings or indicators if updates or mistakes occur. Relevant Signatories will provide examples of exchanges with publishers, including evidence of this engagement as recorded in trustworthiness indicators, and will regularly update their analysis to reflect any changes in the publications' practices, including any improvement of their practices.</p> | <p>NewsGuard is committed to making clear, prominent corrections of any mistakes that appear in our ratings or Nutrition Labels. Our corrections policy is stated on a dedicated <a href="#">page on our website</a>, which includes a form where users can report possible errors for us to review. The corrections appear as notes at the bottom of the relevant Nutrition Label analyses, making clear what the original error was and how it has been corrected.</p> <p>Publishers can also send requests for corrections and have the opportunity to note any error in our ratings and write-ups when they receive our Nutrition Labels, since we systematically send publishers our initial ratings and updates after they are published, thus enforcing their right to be heard.</p> <p>All of our Nutrition Labels are also regularly updated. We constantly update labels in our database, on average once a year, although we update ratings more frequently if we become aware of a change in the publication's practices. When a site's rating changes because the site has improved its practices, this specific change is described in an editor's note. We also engage in lengthy conversations with publishers to help them understand how they can meet certain criteria and improve their score.</p>  |

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|  | For example, in September 2025, French news website AmeliorTaSante.com's score went from 54.5/100 to 77.5/100 after it stopped publishing stories promoting unsubstantiated and inaccurate health claims, particularly about natural remedies.   |
| <b>SLI 22.5.1 - actions enforcing policies above</b> Relevant signatories will report on the total number of instances per Member State where, following a publisher exercising its right to be heard before a rating or updated rating is issued, a rating of untrustworthy changes to a rating of trustworthy. | Total nr of instances when a publisher's rating changed from untrustworthy to trustworthy following a hearing  |
|  | In 2025, 12 websites from our European database (6 French-language, 3 Italian-language, and 3 in German) saw their rating go from untrustworthy (below 60/100) to trustworthy (60/100 and above) after improving their practices.<br><br>All our score changes are recorded internally in the site's rating history, as well as noted in editor's notes at the bottom of each Nutrition Label. Data measurement is therefore easily done by looking at the ratings and updates published in the timeframe concerned. We also record whether sites have responded to our inquiries, and which practice they've improved after engaging with us. |
| <b>SLI 22.5.2 - actions enforcing policies above</b> Relevant Signatories will report regularly on the number of publishers who have improved their journalistic practices after being assessed on the disclosed criteria and whose conformity, respectively trustworthiness scores thereby improved.            | Total nr of publishers who improved their score under the trustworthiness indicator  |
|  | Since NewsGuard launched in 2018, 2,230 news and information websites around the world (in the E.U. but also in the U.S., Canada, the U.K., Australia and New Zealand) have improved their journalism practices after engaging with us, increasing their accountability and providing readers with more trustworthy news and information.<br><br>In 2025, 28 French-language websites, 26 Italian-language websites, and 15 German-language websites improved their NewsGuard ratings.<br><br>All our score changes are recorded in our database and explained in editor's notes at the bottom of each Nutrition Label.                        |
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## VI. Empowering the research community

### 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.

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| Measure 29.1  | Relevant Signatories will use transparent methodologies and ethical standards to conduct research activities that track and analyse influence operations, and the spread of Disinformation. They will share datasets, research findings and methodologies with members of the Task-force including EDMO, ERGA, and other Signatories and ultimately with the broader public. |
| <b>QRE 29.1.1</b> Relevant Signatories will provide reports on their research, including topics, methodology, ethical standards, types of data accessed, data governance, and outcomes. | In 2025, NewsGuard launched three new Tracking Centers. Our <a href="#">Israel-Iran War Misinformation Tracker</a> , identifying false claims spread by Iranian state-affiliated media following Israel's attacks on Tehran's nuclear  |

sites and military leadership on June 13, 2025; our [German Elections Misinformation Tracker](#), covering disinformation — including by Russian actors — targeting Germany's February 2025 snap elections; and our [Southern California Wildfire Tracker](#), debunking false narratives in the fires' wake, provided free of charge to the public and to the Los Angeles Fire Department. (Some of the claims, although US-centric, spread in EU countries, too).

We also regularly updated our [AI Tracking Centre](#) highlighting the ways in which generative AI has already been (or could be) deployed to turbocharge malign influence operations. As for our [Israel-Hamas War Misinformation Tracking Centre](#) and our [Russia-Ukraine Disinformation Tracking Center](#), they catalog all myths about the conflicts, and the websites spreading them.

During the year, NewsGuard's team also produced 17 special reports covering false claims and state-sponsored disinformation on different topics, trends, and platforms, such as:

- 400 and Counting: A Russian Influence Operation Overtakes Official State Media in Spreading Russia-Ukraine False Claims (December 2025)
- Thousands of TikTok Deepfakes Are Attacking UK's Prime Minister and Government, Raking in Millions of Views to Generate Revenue (December 2025)
- Google's New AI Image Generator Is a Misinformation Superspreader (December 2025)
- Russia Targets Armenia's Elections — Early and Viciously (November 2025)
- OpenAI's Sora: When Seeing Should Not Be Believing (October 17)
- New Kremlin-Linked Influence Campaign Targeting Moldovan Elections Draws 17 Million Views on X and Infects AI Models (September 2025)
- Chinese AI Models Register a 60 Percent Fail Rate in NewsGuard Audit of Pro-China Claims (July 2025)
- Russia's Matryoshka Propaganda Machine Picks New Target, Pushing 39 False Claims Against Moldova Over Past Three Months (July 2025)
- The Nation's Top Health Official Is an Even More Dominant Health Hoax Superspreader (June 2025)
- Russian Propaganda Campaign Targets France with AI-Fabricated Scandals, Drawing 55 Million Views on Social Media (April 2025)
- A Well-funded Moscow-based Global 'News' Network has Infected Western Artificial Intelligence Tools Worldwide with Russian Propaganda (March 2025)
- Russia's War on Ukraine: Three Years, Three Hundred and Two False Claims (February 2025)
- DeepSeek Debuts with 83 Percent 'Fail Rate' in NewsGuard's Chatbot Red Team Audit (January 2025)
- Chinese Chatbot Phenom is a Disinformation Machine (January 2025)
- Russian Propagandist Turns His Sights to German Election (January 2025)
- Before Shutdown, Meta's Fact-Checking Program Only Labeled 14 Percent of Russian, Chinese, and Iranian Disinformation Posts (January 2025)

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|  | NewsGuard relies on the data of its two datasets: Reliability Ratings (analyses of the reliability of all the news and information sources that account for 95% of online engagement in the countries it operates in, with 12,258 website ratings as of Dec. 2025), and False Claim Fingerprints (a catalog of the top false claims spreading online, with 4,127 false narratives as of Dec. 2025).  |
| <b>QRE 29.1.2</b> Relevant Signatories will update their research in the Transparency Centre to allow for greater awareness and availability of their work.  | All NewsGuard's yearly reports are available in the Transparency Centre. NewsGuard's public reports have been regularly shared on IDMO's portal.   |
| <b>QRE 29.1.3</b> Relevant Signatories will provide detailed information on methodology development to all stakeholders informed about research results. They will also regularly inform all members of the Task-force, including ERGA, EDMO and other Signatories about research activities they conduct, and, wherever possible, the related methodologies used. They will finally share, wherever possible, such research outcomes and related methodologies with the broader public. | <p>NewsGuard's <a href="#">white paper</a>, "Fighting Misinformation with Journalism, not Algorithms," which is published on our website, outlines independent research on the effect of using human-curated news reliability ratings to mitigate false news, some of which has been conducted by leading academic institutions and other top scholars using NewsGuard's Reliability Ratings dataset.</p> <p>In 2025, dozens of researchers used NewsGuard's Reliability Ratings and/or NewsGuard's False Claim Fingerprints as the basis for their research on false claims and state-sponsored disinformation.</p> <p>NewsGuard is regularly in touch with ERGA and EDMO informing them of its works, making its data available when requested, and offering access to its datasets to monitor disinformation in Europe.</p> <p>NewsGuard's special reports and analyses are all available to the public on NewsGuard's website, including outcomes and methodologies.</p> |

| <b>VIII. Transparency Centre</b>  |  |
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| <b>Commitment 34</b>  |  |
| 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 34.1  | Signatories establish and maintain the common Transparency Centre website, which will be operational and available to the public within 6 months from the signature of this Code.  |
| Measure 34.2  | Signatories provide appropriate funding, for setting up and operating the Transparency Centre website, including its maintenance, daily operation, management, and regular updating. Funding contribution should be commensurate with the nature of the Signatories' activity and shall be sufficient for the website's operations and maintenance and proportional to each Signatories' risk profile and economic capacity. |
| Measure 34.3  | Relevant Signatories will contribute to the Transparency Centre's information to the extent that the Code is applicable to their services.   |
| Measure 34.4  | Signatories will agree on the functioning and financing of the Transparency Centre within the Task-force, to be recorded and reviewed within the Task-Force on an annual basis.  |

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| Measure 34.5 | The Task-force will regularly discuss the Transparency Centre and assess whether adjustments or actions are necessary. Signatories commit to implement the actions and adjustments decided within the Task-force within a reasonable timeline. |
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| <b>VIII. Transparency Centre</b>  |   |
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| <b>Commitment 35</b>  |   |
| 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 35.3  | Signatories ensure that the Transparency Centre contains a repository of their reports assessing the implementation of the Code's commitments.  |
| Measure 35.6  | The Transparency Centre will enable users to easily access and understand the Service Level Indicators and Qualitative Reporting Elements tied to each Commitment and Measure of the Code for each service, including Member State breakdowns, in a standardised and searchable way. The Transparency Centre should also enable users to easily access and understand Structural Indicators for each Signatory. |

| <b>VIII. Transparency Centre</b>   |   |
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| <b>Commitment 36</b>   |   |
| Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner. [change wording if adapted]  |   |
| Measure 36.2   | Signatories will regularly update Service Level Indicators, reporting elements, and Structural Indicators, in parallel with the regular reporting foreseen by the monitoring framework. After the first reporting period, Relevant Signatories are encouraged to also update the Transparency Centre more regularly.                  |
| Measure 36.3   | Signatories will update the Transparency Centre to reflect the latest decisions of the Permanent Task-force, regarding the Code and the monitoring framework.   |
| <b>QRE 36.1.1 (for the Commitments 34-36)</b> With their initial implementation report, Signatories will outline the state of development of the Transparency Centre, its functionalities, the information it contains, and any other relevant information about its functioning or operations. This information can be drafted jointly by Signatories involved in operating or adding content to the Transparency Centre. | NewsGuard committed to setting up and maintaining a publicly available common Transparency Centre website. All relevant information related to the implementation of the Code's Commitments and Measures will be presented in an easy-to-understand and clear manner. That information will be regularly updated in a timely fashion. |

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| <p><b>QRE 36.1.2 (for the Commitments 34–36)</b> Signatories will outline changes to the Transparency Centre’s content, operations, or functioning in their reports over time. Such updates can be drafted jointly by Signatories involved in operating or adding content to the Transparency Center.</p> | <p>NewsGuard will be working with the other Signatories to outline any changes in the Transparency Centre’s content, operations, or functioning in their reports over time.</p> |
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| <b>IX. Permanent Task-Force</b>   |   |
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| <b>Commitment 37</b>  |   |
| <p>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]</p> |   |
| <p>Measure 37.1</p>   | <p>Signatories will participate in the Task-force and contribute to its work. Signatories, in particular smaller or emerging services will contribute to the work of the Task-force proportionate to their resources, size and risk profile. Smaller or emerging services can also agree to pool their resources together and represent each other in the Task-force. The Task-force will meet in plenary sessions as necessary and at least every 6 months, and, where relevant, in subgroups dedicated to specific issues or workstreams.</p>   |
| <p>Measure 37.2</p>   | <p>Signatories agree to work in the Task-force in particular – but not limited to – on the following tasks:</p> <ul style="list-style-type: none"> <li>- Establishing a risk assessment methodology and a rapid response system to be used in special situations like elections or crises.</li> <li>- Cooperate and coordinate their work in special situations like elections or crisis</li> <li>- Agree on the harmonised reporting templates for the implementation of the Code’s Commitments and Measures, the refined methodology of the reporting, and the relevant data disclosure for monitoring purposes.</li> <li>- Review the quality and effectiveness of the harmonised reporting templates, as well as the formats and methods of data disclosure for monitoring purposes, throughout future monitoring cycles and adapt them, as needed.</li> <li>- Contribute to the assessment of the quality and effectiveness of Service Level and Structural Indicators and the data points provided to measure these indicators, as well as their relevant adaptation.</li> <li>- Refine, test and adjust Structural Indicators and design mechanisms to measure them at Member State level.</li> <li>- Agree, publish and update a list of TTPs employed by malicious actors, and set down baseline elements, objectives and benchmarks for Measures to counter them, in line with the Chapter IV of this Code.</li> <li>- Seek out and discuss research, expert input and up-to-date evidence relevant to the Code’s commitments, such as, inter alia, emerging best practices in safe design, retroactive flagging, repository of fact-checks, provenance tools.</li> </ul> |

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|  | <ul style="list-style-type: none"> <li>- Discuss and provide guidance on the adequate quantitative information to be provided by signatories to fulfill their reporting obligations regarding agreements with fact-checking organisations across different services.</li> <li>- Regularly discuss whether the Code's Commitments and Measures need updating in view of technological, societal, market and legislative developments, as well as in view of accommodating new signatories and, where the Task-force agrees to be necessary, carry out such updates.</li> <li>- Review the appropriateness and consistency of adapted Measures for smaller or emerging services.</li> <li>- Promote the Code among relevant peers and integrate new Signatories to the Code.</li> </ul> |
| Measure 37.3   | The Task-force will agree on and define its operating rules, including on the involvement of third-party experts, which will be laid down in a Vademecum drafted by the European Commission in collaboration with the Signatories and agreed on by consensus between the members of the Task-force.   |
| Measure 37.4   | Signatories agree to set up subgroups dedicated to the specific issues related to the implementation and revision of the Code with the participation of the relevant Signatories.   |
| Measure 37.5   | When needed, and in any event at least once per year the Task-force organises meetings with relevant stakeholder groups and experts to inform them about the operation of the Code and gather their views related to important developments in the field of Disinformation.   |
| Measure 37.6   | Signatories agree to notify the rest of the Task-force when a Commitment or Measure would benefit from changes over time as their practices and approaches evolve, in view of technological, societal, market, and legislative developments. Having discussed the changes required, the Relevant Signatories will update their subscription document accordingly and report on the changes in their next report.  |
| <b>QRE 37.6.1</b> Signatories will describe how they engage in the work of the Task-force in the reporting period, including the sub-groups they engaged with. | NewsGuard has been regularly participating in the meetings of the Code of Practice signatories.   |

| <b>X. Monitoring of Code</b>  |   |
|---|---|
| <b>Commitment 38</b>  |   |
| The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes to ensure the implementation of their commitments under the Code. [change wording if adapted]               |   |
| Measure 38.1  |   |
| <b>QRE 38.1.1</b> Relevant Signatories will outline the teams and internal processes they have in place, per service, to comply with the Code in order to achieve full coverage across the Member States and the languages of the EU. | Members of NewsGuard's European team (including Roberta Schmid, Virginia Padovese and Chine Labbé, co-Managing Editors and Senior Vice-Presidents for Europe.) are responsible for implementing and monitoring the company's commitments under the code in Germany, Austria, Italy, and France. |

## 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 | Other Signatories will report yearly on the implementation of the Commitments and Measures taken under the present Code, including on the relevant QREs and SLIs, at service and Member State level.  |
| Measure 40.3 | Signatories will regularly update the Transparency Centre with relevant QREs and SLIs, at least in line with their reporting period under this Code.  |
| Measure 40.4 | Signatories will develop, within the Task-force, harmonised reporting templates.  |
| Measure 40.5 | Signatories will regularly work to improve and optimise the monitoring and reporting framework of the Code, including the SLIs, within the Task-force, building in particular on feedback from the European Commission, ERGA and EDMO.  |
| Measure 40.6 | Signatories will cooperate with the European Commission, respond to its reasonable requests and provide the European Commission with reasonable information, data and further input necessary to assess the implementation of the Code, allowing for the Code's efficient and thorough monitoring, including at Member State Level. |

## X. Monitoring of Code

### Commitment 41

|  |   |
|--|---|
| <p>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. [change wording if adapted]</p> |   |
| Measure 41.1   | <p>Within 1 month of signing the Code, Signatories will establish a Working Group to tackle this objective. This working group will be tasked with putting forward data points to be provided by Platform Signatories, and a methodology to measure Structural Indicators on the base of these data points, to be executed by non-Platform Signatories. Signatories will share data points appropriate to enable the measurement of metrics to be determined by the working group, such as prevalence or other contextualised metrics for sources and spread of online disinformation. Signatories will assess the work that will be necessary to deliver on the goals of this commitment, and discuss within the Task-force whether financial support is required.</p>   |
| Measure 41.2   | <p>The Working Group will report on its progress to the Task-force on a trimestral basis. It will consult with expert stakeholders including but not limited to EDMO, ERGA, and researchers to inform its work and outputs. 7 months after the signing of the Code, a conference will be convened with external stakeholders to present on progress thus far and seek feedback.</p>   |
| Measure 41.3   | <p>By 6 months after the signing of the Code, the Working Group will table with the Task-force a workable proposal for such Structural Indicators. By 9 months, relevant Signatories will provide to others within the Working Group the data points required to measure the Structural Indicators, and they will share publicly the aligned Structural Indicators. The Working Group will publish their measurements for the Structural Indicators in line with the first full report by the Signatories, as well as its full methodology, with the understanding that those may still require refinements over time. Signatories commit to keep updating the measurements, aligned with their reporting periods. Measurements will be published on the Transparency Centre in a way that allow to monitor them over time for the entire ecosystem and between different services.</p> |

## 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 a period of crisis

## Reporting on the service’s response during a crisis

### Russia-Ukraine crisis

Threats observed or anticipated at time of reporting: In 2025 NewsGuard continued updating its “Russia-Ukraine Disinformation Tracking Center,” launched in March 2022, immediately after Russia started its full-scale invasion. Through our constant monitoring of Russian disinformation in languages including Russian, English, French, Italian, and German across different platforms and websites, we reported on how state-affiliated actors were pushing false narratives about Ukraine, but also sowing division and nurturing anti-war and war fatigue sentiments across Member States and playing up European fears and dissent. As of December 2025, NewsGuard’s Russia-Ukraine Disinformation Tracking Center had identified 400 false narratives about the war, being spread by 561 websites around the world, including in Italy, France, Germany and Austria, versus 280 false claims at the end of 2024.

Mitigations in place at time of reporting: N/A

[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].

### Scrutiny of Ads Placements

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

|   |   |
|---|---|
| <b>Specific Action applied</b><br>(Measure 1.6) | <p>Throughout the year, NewsGuard monitored and added to its database new detailed Reliability Ratings of websites spreading Russian Disinformation. In February 2025, NewsGuard launched flags in our False Claim Fingerprints database to specify whether the myth originated or spread on Russian state-controlled or influenced sources.</p> <p>NewsGuard also continued to update the “Russia-Ukraine War” metadata field accompanying its Reliability Ratings, to allow brands and advertisers using its BrandGuard services to easily identify these sites and make sure their ad money does not support the Kremlin disinformation machine. In doing so, NewsGuard continued using its transparent and apolitical evaluation process, whose methodology is detailed on its website, with all criteria clearly explained to publishers. NewsGuard also made sure that news publishers being flagged for spreading Russia-Ukraine disinformation were aware of it, and given a right to comment on issues flagged by NewsGuard. NewsGuard also continued offering these websites the possibility to publish a full response to their ratings.</p> |
|   | Indication of impact (at beginning of action: N/A   |

| <b>Empowering Users</b>   |   |
|---|---|
| <p>In 2025, NewsGuard continued to closely monitor sources of Russian disinformation within the continent, constantly adding new sources to its Tracking Center, and rating these sources according to its transparent rating system, so that users with access to its browser extension (a consumer product available to all for a monthly subscription fee) could make informed decision about which sources to trust, and which to be wary of, when reading the news online, and as the war became a protracted one. In a non-crisis situation, NewsGuard's main editorial promise is to rate all news and information sites that account for 95% of online engagement with news. However, for this specific line of work - just like we do for every crisis situation and did before for the COVID-19 pandemic -, NewsGuard's analysts went further, looking for any site spreading mis- and disinformation about the war in the languages we cover (English, French, Italian and German.) - even those responsible for very little online engagement - and making sure we rated them. We also made sure to track all sources that spread the myths we were uncovering, in order to cover more sources.</p> |   |
| <p><b>Specific Action applied</b><br/>(Measures 17.2, 17.3, 22.4, and 22.5)</p>   | <p>In 2025, NewsGuard's analysts participated in 21 media literacy seminars and awareness raising events in France, Italy, and Germany, and participated in 41 speaking engagements in Italy, France, Belgium, Ireland and Norway. Most touched on all relevant crises, including the Russia-Ukraine war.</p> <p>Throughout the year, NewsGuard's analysts fed its browser extension with transparent analyses of sources spreading false claims about the Russia-Ukraine war. The analysts continued basing their ratings - as they always do - on NewsGuard's transparent, apolitical and independent process, applying equally our nine criteria to all sources.</p>   |
|   | <p>Indication of impact (at beginning of action: N/A)</p>   |
| <b>Empowering the Research Community</b>  |   |
| <p>Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.</p>  |   |
| <p><b>Specific Action applied</b><br/>(Measure 29.1)</p>  | <p>In 2025, NewsGuard published three reports on the Russia-Ukraine crisis. The first one, published in February 2025, and titled "Russia's War on Ukraine: Three Years, Three Hundred and Two False Claims," explored the then-302 provably false claims NewsGuard had identified and debunked since the start of the war. In December 2025, a second report titled "400 and Counting: A Russian Influence Operation Overtakes Official State Media in Spreading Russia-Ukraine False Claims," expanded on NewsGuard's earlier findings, and found that secret, anonymous Russian influence operations had surpassed official state media as the biggest source of false narratives in 2025. In March 2025, NewsGuard published "A Well-funded Moscow-based Global 'News' Network has Infected Western Artificial Intelligence Tools Worldwide with Russian Propaganda," a widely cited report which found that the 10 leading commercial generative AI tools contributed to Moscow's disinformation goals by repeating false claims from the pro-Kremlin Pravda network 33 percent of the time.</p> |
|   | <p>Indication of impact (at beginning of action: N/A)</p>   |

## Reporting on the service's response during a crisis

### Israel-Iran War Tracking Center 2025

NewsGuard launched its 2025 Israel-Iran War Misinformation Tracking Center on June 13, 2025, hours after Israel launched attacks against Tehran's nuclear sites and military leadership. Iranian state-controlled and affiliated media sources immediately began spreading false claims attempting to portray Israel's attack as a failure and Iran's retaliation as a success. NewsGuard's global team of analysts have identified 26 false claims spreading across social media about this war, and 78 websites advancing the claims, from AI-generated images purporting to show mass destruction in Tel Aviv to false claims about the supposed capturing of Israeli pilots and other personnel. The sources spreading these claims included Iranian military-affiliated Telegram channels as well as official Iran state media sources operating under the Islamic Republic of Iran Broadcasting (IRIB), an Iranian state-owned corporation sanctioned by the U.S. Treasury Department.

Mitigations in place at time of reporting: N/A

[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].

#### Scrutiny of Ads Placements

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

**Specific Action applied**  
(Measure 1.6)

Over the course of several months after the start of the Israel-Iran 2025 War, NewsGuard monitored and added to its database new unreliable websites spreading false claims about the war. In doing so, NewsGuard continued using its transparent and apolitical evaluation process, whose methodology is detailed on its website, with all criteria clearly explained to publishers. Tracking these websites offered advertisers a way to avoid inadvertently funding them through programmatic advertisement.

Indication of impact (at beginning of action: N/A

#### Empowering Users

|  |   |
|--|---|
| <p>In 2025, NewsGuard ramped up efforts to identify, rate, and monitor sources of false claims and state-sponsored disinformation, constantly adding new sources to its Tracking Centers, and rating these sources according to its transparent rating system, so that users with access to its browser extension (a consumer product available to all for a monthly subscription fee) could make informed decisions about which sources to trust. NewsGuard's global team of information integrity experts also regularly shared its findings on the false claims spreading about the war through its public newsletter, Reality Check.</p> <p>In a non-crisis situation, NewsGuard's main editorial promise is to rate all news and information sites that account for 95% of online engagement with news. However, for this specific line of work - just like we do for every crisis situation, and did before for the COVID-19 pandemic, and the Russia-Ukraine war, as described above -, NewsGuard's analysts went further, looking for any site spreading false claims about the conflict in the languages we cover (English, French, Italian and German,) - even those responsible for very little online engagement - and making sure we rated them. We also made sure to track all sources that spread the myths we were uncovering, in order to cover more sources.</p> |   |
| <p><b>Specific Action applied</b><br/>(Measures 17.2, 17.3, 22.4, and 22.5)</p>  | <p>In 2025, NewsGuard's analysts participated in 21 media literacy seminars and awareness raising events in France, Italy, and Germany, and participated in 41 speaking engagements in Italy, France, Belgium, Ireland, and Norway. Most touched on all relevant crises, including the war.</p> <p>As stated above, throughout the year, NewsGuard's analysts fed its browser extension with transparent analyses of sources spreading false claims about the war, and debunked the claims spreading through its tracking center. The analysts based their ratings - as they always do - on NewsGuard's transparent, apolitical and independent process, applying equally our nine criteria to all sources.</p> |
|  | <p>Indication of impact (at beginning of action: N/A)</p>   |
| <p><b>Empowering the Research Community</b></p>  |   |
| <p>Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.</p>   |   |
| <p><b>Specific Action applied</b><br/>(Measure 29.1)</p>   | <p>In 2025, NewsGuard sent regular briefings to its clients - including researchers - and consumers, on the war, on top of updating its Tracking Center.</p>  |
|  | <p>Indication of impact (at beginning of action: N/A)</p>   |

## Reporting on the service's response during a crisis

### Rise of AI-generated content and Foreign Influence of Large-Language Models

In 2025, NewsGuard continued to regularly publish AI False Claims Monitors, which measure the propensity for leading AI chatbots (such as ChatGPT, Gemini and Mistral) to produce false information when prompted with untrue claims and false narratives about the news, including State-sponsored narratives. Using a journalistic method grounded in rigorously verified data and human expertise, these Monitors measure the trustworthiness of commercial AI tools in relation to the news. NewsGuard analysts identify vulnerabilities in AI systems that result in the spread of false information, allowing developers to strengthen their models and improve their safeguards as usage of the technology increases around the world.

Mitigations in place at time of reporting: N/A

[Note: Signatories are requested to provide information relevant to their particular response to the threats and challenges they observed on their service(s). They ensure that the information below provides an accurate and complete report of their relevant actions. As operational responses to crisis/election situations can vary from service to service, an absence of information should not be considered a priori a shortfall in the way a particular service has responded. Impact metrics are accurate to the best of signatories' abilities to measure them].

#### Empowering Users

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

|   |   |
|---|---|
| <b>Specific Action applied</b><br>(Measures 17.2, 17.3) | <p>In 2025, NewsGuard's analysts participated in 21 media literacy seminars and awareness raising events in France, Italy, and Germany, as well as 41 speaking engagements in Italy, France, Belgium, Ireland and Norway. Most touched on all relevant crises, including the rise of AI-generated content, and how large-language models can be weaponized by malign actors into spreading state-sponsored propaganda and false narratives. For example, in May 2025, one of our team members delivered a keynote at the AI Week in Italy, discussing how generative AI could contribute to Russian disinformation reaching Western news consumers more directly and effectively.</p> |
|   | <p>Indication of impact (at beginning of action: N/A)</p>   |

#### Empowering the Research Community

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

**Specific Action applied**  
(Measure 29.1)

In 2025, NewsGuard published 8 AI False Claim Monitors, including one (in January 2025) that audited the chatbots in multiple Member State languages, namely French, German, Italian and Spanish.

In its reports, NewsGuard described the research methodology of the analysis. All these reports were published on NewsGuard's website, where they still are available.

Indication of impact (at beginning of action: N/A

# Reporting on the service's response during an election

**Reporting on the service’s response during an election  
German Elections Misinformation Tracking Center 2025**

NewsGuard launched its 2025 German Elections Misinformation Tracking Center on February 24, 2025, to address the barrage of false claims targeting the German snap elections. NewsGuard identified 22 false claims related to the vote, including disinformation spread by Russian actors, and targeting mainstream political parties that support NATO and Ukraine. These false claims aimed at boosting the far-right party Alternative für Deutschland (AfD), but also risked undermining the citizens’ overall trust in government institutions and in the electoral process. NewsGuard also found that bad actors were increasingly employing AI tools, including deepfake technology, to generate convincing false narratives with fabricated testimonies and manipulated videos. U.S. national turned Russian disinformation operative John Mark Dougan was notably responsible for launching and operating 102 fake local news websites powered by AI, and designed to mimic independent local news sites in Germany, with names such as “Berliner Tageblatt” and “Hamburger Anzeiger.”

Mitigations in place – or planned – at time of reporting: N/A

[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].

**Scrutiny of Ads Placements**

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

|   |  |
|---|--|
| <p><b>Specific Action applied</b><br/>(Measure 1.6)</p> | <p>During several months before and after the February 2025 German Snap Elections, NewsGuard monitored and added to its database new unreliable websites spreading false claims about the German elections and its candidates. In doing so, NewsGuard continued using its transparent and apolitical evaluation process, whose methodology is detailed on its website, with all criteria clearly explained to publishers. Tracking these websites offered advertisers a way to avoid inadvertently supporting websites spreading false claims about the vote, through programmatic advertisements.</p> |
|   | <p>Indication of impact (at beginning of action: N/A)</p>  |

**Empowering Users**

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

|  |  |
|--|--|
| <p><b>Specific Action applied</b><br/>(Measures 17.2, 17.3, 22.4, and 22.5)</p>  | <p>In 2025, NewsGuard ramped up efforts to identify, rate, and monitor sources of election meddling in Europe, particularly for the German snap elections, but also ahead of the Armenian and Moldovan legislative elections. NewsGuard constantly added new sources of election misinformation to its database, rating them according to its transparent rating system, so that users with access to its browser extension (a consumer product available to all for a monthly subscription fee) could make informed decisions about which sources to trust, and which ones they should be wary of. NewsGuard's global team of information integrity experts identified 22 myths about the elections spreading across social media, as well as 102 fake local websites pushing them, hailing from a Russian disinformation operation. NewsGuard shared its most salient findings with the general public through its public newsletter and reports.</p> <p>In a non-crisis situation, NewsGuard's main editorial promise is to rate all news and information sites that account for 95% of online engagement with news. However, for this specific line of work - just like we do for every crisis situation, and did before for the COVID-19 pandemic, and the Russia-Ukraine war, as described above -, NewsGuard's analysts went further, looking for any site spreading false claims and disinformation about the conflict in the languages we cover (English, French, Italian and German,) - even those responsible for very little online engagement - and making sure we rated them. We also made sure to track all sources that spread the myths we were uncovering, in order to cover more sources.</p> <p>Indication of impact (at beginning of action: expected impact) including relevant metrics when available</p> |
| <p><b>Empowering the Research Community</b></p>  |  |
| <p>Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.</p> |  |
| <p><b>Specific Action applied</b><br/>(Measure 29.1)</p>   | <p>In 2025, NewsGuard's analysts participated in 21 media literacy seminars and awareness raising events in France, Italy, and Germany, and also participated in 41 speaking engagements in Italy, France, Belgium, Ireland, and Norway. Most touched on all relevant crises, including the February 2025 German snap elections.</p> <p>As stated above, throughout the year, NewsGuard's analysts fed its browser extension with transparent analyses of websites spreading false claims about the vote, and debunked all related myths through its tracking center. The analysts based their ratings - as they always do - on NewsGuard's transparent, apolitical and independent process, applying equally our nine criteria to all sources.</p> <p>Indication of impact (at beginning of action: expected impact) including relevant metrics when available</p>  |