Code of Conduct on Disinformation – Report of Microsoft Advertising for the period 1 January – 31 December 2025

Table of Contents

Executive summary

Microsoft Ireland Operations Limited, the provider of Microsoft Advertising in the European Union (EU), submits this report outlining its implementation of the commitments under the Code of Conduct on Disinformation for the full calendar year 2025 ("reporting period"). Microsoft is committed to preventing the misuse of advertising services to disseminate or monetise disinformation and to supporting broader efforts to protect the integrity of the information ecosystem.

Microsoft Advertising serves ads displayed on Bing Search, other Microsoft services, and third-party properties. The platform connects advertisers, who provide advertising content, with publishers, who display these advertisements on their services. To mitigate the risk of disinformation, Microsoft Advertising applies distinct policies and enforcement measures to advertisers and publishers, including restrictions on non-compliant content and placements and actions against parties that fail to comply with applicable requirements.

During the reporting period, Microsoft Advertising continued to apply these policies and enforcement measures, focusing on targeted, policy-based enforcement supported by transparency and cooperation with relevant stakeholders, consistent with the role of advertising services in the information ecosystem. Microsoft Advertising will continue to evaluate and refine its policies, enforcement processes, and reporting practices in line with the Code's commitments and evolving risks.

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.	
Measure 1.1	
QRE 1.1.1	Outline relevant actions [suggested character limit: 2000 characters] Microsoft Advertising prohibits misinformation and disinformation on its network. To enforce this policy, Microsoft Advertising may use a combination of internal signals and trusted third-party data or information sources to reject, block, or remove ads or sites that contain disinformation or that direct traffic to disinformation content. Enforcement actions may include blocking at the domain level where landing pages or sites violate this policy. Our primary policy is available here. During the reporting period, Microsoft Advertising enhanced its detection capabilities through continued integration with services provided by the Microsoft Threat Analysis Center (MTAC), including signals related to Foreign Information Manipulation and Interference (FIMI) domains. MTAC operates as part of Microsoft's broader threat intelligence structure, alongside the Microsoft Threat Intelligence Center (MSTIC) and the Digital Crimes Unit, and focuses on identifying foreign malign influence operations and state-aligned information campaigns. MTAC applies a geopolitical influence-operations lens to analyse propaganda, coordinated information operations, and state-backed manipulation campaigns, including cross-platform narrative efforts and manipulated or deceptive content targeting public opinion. Microsoft Advertising regularly consumes domain- and web-property-level intelligence informed by MTAC analysis to detect ads and publishers associated with disinformation, misinformation, impersonation, or influence operations. Detection methods are continuously refined to address evolving tactics. Microsoft Advertising prioritises early, preventive enforcement, stopping non-compliant advertising content prior to delivery. As a result, significant enforcement actions occur at or before demand creation, reflecting platform improvements that reduce user exposure to harmful or misleading content at the earliest possible stage.
SLI 1.1.1 – Numbers by actions enforcing policies above (specify if at ad and/or domain level)	Methodology of data measurement [suggested character limit: 500 characters] Microsoft Advertising reports enforcement based on ads and domains blocked prior to delivery. • *Blocked Ads* represent individual advertisements detected and prevented from serving globally due to non-compliance with misinformation and disinformation policies. • *Blocked Domains* represent web domains proactively blocked from the advertising network, including based on MTAC domain intelligence, across all regions. Because enforcement now occurs upstream before ads reach the impression or page-view stage, exposure-based metrics (e.g., blocked impressions or page views) are no longer reliable or consistently available. This methodology reflects current system design and provides an accurate representation of preventive enforcement activity.

	Type of Action 1 [linked to the policy mentioned in QRE]	Type of Action 2 [linked to the policy mentioned in QRE]
Data	Blocked Ads	Blocked Domain
Global	512,442	202
This additional Service Level Indicator provides an estimated financial value of the actions taken by Signatories to demonetise disinformation sources (under SLI 1.1.1). It is based on media metrics available to Signatories (query/bid[1] or impression[2]) and applying an agreed-upon conversion factor provided by a third party designated by the Taskforce of the Code (Ebiquity plc.).		
SLI 1.1.2 - Preventing the flow of legitimate advertising investment to sites or content that are designated as disinformation	Methodology of data measurement [suggested character limit: 500 characters] Following the methodology developed by the Task-force Subgroup on Ad Scrutiny, this SLI estimates the financial impact of demonetisation by applying an agreed-upon CPM-based conversion factor to publisher page-view data. Microsoft Advertising operates a pay-per-click (PPC) advertising model, under which advertisers are charged when users click on ads rather than based on impressions. To align with the Task-force methodology, Microsoft Advertising therefore estimates monetisation impact using blended CPM values provided by Ebiquity Plc., calculated as (Page Views / 1,000) × CPM. Luxembourg and Liechtenstein are not included in the Ebiquity dataset; Belgium and Austria CPM values are applied as proxies based on economic and market comparability. As described above, Microsoft Advertising prevents serving ads on web domains that spread disinformation, including those associated with Foreign Information Manipulation and Interference (FIMI), blocking monetisation on those properties at the earliest point of identification. Publisher page-view data associated with the set of 202 domains blocked during 2025 was used as the basis for this calculation. While prior reports relied on exposure-based metrics that could be reconstructed across the reporting period, the 2025 application of this methodology relies on publisher-side page-view data that was not historically retained for this specific purpose and only became consistently available from 19 August 2025 onward. Accordingly, the amounts below are based on observed data for that period and prorated to support full-year comparability.	
Data	Euro value of ads demonetised	
Member States		
Austria	€ 592.20	
Belgium	€ 1,169.06	
Bulgaria	€ 9.89	
Croatia	€ 22.61	
Cyprus	€ 8.09	
Czech Republic	€ 28.68	
Denmark	€ 359.91	
Estonia	€ 101.66	
Finland	€ 296.52	
France	€ 2,110.38	
Germany	€ 7,339.71	

[1] Request placed between a seller and buyer of advertising that can detail amongst other things website, specific content, targeting data inclusive of audience or content.

[2] Comprehensive calculation of the number of people who have been reached by a piece of media content by passive exposure (viewing a piece of content) or active engagement (visiting a destination).

Greece	€ 18.00
Hungary	€ 440.94
Ireland	€ 1,018.51
Italy	€ 14,838.64
Latvia	€ 6.05
Lithuania	€ 4.03
Luxembourg	€ 0.35
Malta	€ 2.89
Netherlands	€ 1,316.72
Poland	€ 40.29
Portugal	€ 50.47
Romania	€ 297.01
Slovakia	€ 68.91
Slovenia	€ 8.14
Spain	€ 681.92
Sweden	€ 996.86
Iceland	€ 3.02
Liechtenstein	€ 1.01
Norway	€ 419.07
Total EU	€ 31,828.49
Total EEA	€ 32,251.56
Measure 1.2	
QRE 1.2.1	Outline relevant actions [suggested character limit: 2000 characters] Microsoft Advertising works with selected, trusted publishing partners and requires them to comply with strict brand-safety policies designed to prevent the monetisation of misleading, deceptive, harmful, or insensitive content. These publishers also benefit from the safeguards Microsoft Advertising applies to advertisers, helping ensure that ads delivered through the platform are high-integrity and non-deceptive. Microsoft Advertising's publisher policies include a comprehensive list of prohibited content that ads may not serve against. This includes, among other things, disinformation, sensitive political content (such as extreme, aggressive, or misleading interpretations of news, events, or individuals), unmoderated user-generated content, and other unsavoury content (including content that disparages individuals or organisations). Publishers are required to maintain prohibited-term lists and, where applicable, provide information about their content-management practices. Publishers must also comply with restrictions on harmful business practices, such as the distribution of malware. Microsoft Advertising reviews publisher properties and domains for compliance with these policies, including restrictions on prohibited content. This review also considers advertiser feedback and includes a process for investigating advertiser complaints. Properties or domains that violate policy are not approved for live ad traffic, or are removed from the network if already live, until the issue is remedied.

	As stated in Microsoft Advertising's policies, the platform may use a combination of internal signals and trusted third-party data to reject, block, or remove ads or sites that contain disinformation or direct traffic to disinformation content. In 2025, Microsoft Advertising further evolved these practices by integrating Microsoft Threat Analysis Center (MTAC) services to support the detection of Foreign Information Manipulation and Interference (FIMI) domains.			
SLI 1.2.1	Methodology of data measurement [suggested character limit: 500 characters] As reported in SLI 1.1.1, Microsoft Advertising applies domain-level enforcement globally rather than at the Member State level. Accordingly, we report a single global aggregate of 202 domains barred during the reporting period. Microsoft Advertising did not bar advertiser accounts during this period, as enforcement actions are taken by blocking non-compliant web domains across the network, irrespective of the advertising account promoting them. No new policies were introduced during the reporting period; therefore, the number of policy reviews is zero.			
Data	Nr of policy reviews	Nr of update to policies	Nr of accounts barred	Nr of domains barred
Global	0	0	0	202
Measure 1.3				
QRE 1.3.1	Microsoft Advertising provides customers with campaign reporting and tools to monitor and control ad placement across its network. Transparency controls are available through the campaign user interface and customer support, and include: • Ad delivery reports (domain level): Reports showing the website or domain where ads are served. • Site exclusions: Ability to exclude specific websites or domains from campaigns to prevent ads from serving on those properties. • Negative keyword exclusions: Ability to exclude keywords to prevent ads from serving against certain search queries. • Syndication Publisher Network opt-out: Ability to prevent ad delivery on the extended publisher network, in which case ads serve only on Microsoft-owned and operated properties.			
Measure 1.6				
QRE 1.6.1	As described in QRE 1.1.1 and QRE 1.2.1, Microsoft Advertising evolved its detection methods in 2025 by applying Microsoft Threat Analysis Center (MTAC) services, including signals related to Foreign Information Manipulation and Influence (FIMI). Microsoft Advertising blocks web domains identified through these services as spreading disinformation. Please see QRE 1.3.1 for transparency and control functionalities.			
QRE 1.6.2	Outline relevant actions [suggested character limit: 2000 characters] This QRE is not relevant or pertinent as Microsoft Advertising does not buy advertising.			
QRE 1.6.3	Outline relevant actions [suggested character limit: 2000 characters]			

	This QRE is not relevant or pertinent as Microsoft Advertising is not a brand safety tool provider.
QRE 1.6.4	Outline relevant actions [suggested character limit: 2000 characters] This QRE is not relevant or pertinent as Microsoft Advertising is not a ratings service.
SLI 1.6.1	Methodology of data measurement [suggested character limit: 500 characters] N/A
	In view of steps taken to integrate brand safety tools: % of advertising/ media investment protected by such tools: N/A
Data	

II. Scrutiny of Ad Placements	
Commitment 2 Relevant Signatories participating in advertising commit to prevent the misuse of advertising systems to disseminate Disinformation in the form of advertising messages. [change wording if adapted]	
Measure 2.1	
QRE 2.1.1	Outline relevant actions [suggested character limit: 2000 characters] As described in QRE 2.2.1, Microsoft Advertising maintains network-wide policies, implemented in December 2022, that prohibit the monetisation of disinformation and the placement of advertising on or adjacent to disinformation content. These policies prohibit ads or sites that contain, promote, or direct traffic to disinformation. Enforcement may rely on internal signals and trusted third-party data sources to reject, block, or remove ads or sites, including blocking at the domain level where landing pages or sites violate policy. Please see here for our main policy page.
SLI 2.1.1 – Numbers by actions enforcing policies above	Microsoft Advertising assesses the impact of its enforcement actions by reporting on blocked ads, customers suspended as a result of risk detection, and impressions generated prior to enforcement. “Blocked Ads” are the individual advertisements (or ad creatives) loaded in the Microsoft Advertising campaign system that we blocked. Because these ads are blocked globally, we are reporting the same number across all Member States for the reporting period.

	"Unique Domains" means the web domain or URLs that the Unique Ads would have directed customers to. Because these ad domains are blocked globally, we are reporting the same number across all Member States for the reporting period. "Customer suspensions" means the suspension of advertiser access to Microsoft Advertising services for willful or repeated violations of policies relating to phishing, malware, or payment instrument fraud. Suspended advertisers cannot serve ads until the violation is remedied. "Blocked Impressions from Suspended Customers" means ad impressions generated by customer prior to suspension. Where customers are suspended before ads are served, no impressions are recorded.			
	The number of ads Microsoft restricted under the misinformation policies in QRE 2.1.1 between 1 January – 31 December 2025.			
	Type of Action 1 [linked to the policy mentioned in QRE]	Type of Action 2 [linked to the policy mentioned in QRE]	Type of Action 3 [linked to the policy mentioned in QRE]	Type of Action 4 [linked to the policy mentioned in QRE]
Data	*Blocked Ads*	*Unique Domains*	*Customer Suspensions*	*Blocked Impressions from Suspended Customers*
Austria	512,442	9.984	363	0
Belgium	512,442	9.984	719	7,033
Bulgaria	512,442	9.984	153	1,638
Croatia	512,442	9.984	63	0
Cyprus	512,442	9.984	177	905,374
Czech Republic	512,442	9.984	333	78,516
Denmark	512,442	9.984	978	414,732
Estonia	512,442	9.984	415	0
Finland	512,442	9.984	498	37,802
France	512,442	9.984	6,540	808,487
Germany	512,442	9.984	7,710	2,612,554
Greece	512,442	9.984	113	30,278
Hungary	512,442	9.984	110	0
Ireland	512,442	9.984	674	66,002
Italy	512,442	9.984	1,643	1,237,368
Latvia	512,442	9.984	290	3,831,145
Lithuania	512,442	9.984	118	935,425
Luxembourg	512,442	9.984	36	0
Malta	512,442	9.984	65	2,449
Netherlands	512,442	9.984	1,358	2,470,021
Poland	512,442	9.984	1,100	1,611,797
Portugal	512,442	9.984	302	182,225

Romania	512,442	9.984	603	130,474
Slovakia	512,442	9.984	140	0
Slovenia	512,442	9.984	92	0
Spain	512,442	9.984	2,338	138,633,067
Sweden	512,442	9.984	701	575,859
Iceland	512,442	9.984	112	0
Liechtenstein	512,442	9.984	4	0
Norway	512,442	9.984	1,166	514,617
Total EU	512,442	9.984	27,632	154,572,246
Total EEA	512,442	9.984	28,259	155,086,863

Measure 2.2	
QRE 2.2.1	Microsoft Advertising employs dedicated operational support and engineering resources to enforce its advertising policies detailed below, combining automated and manual enforcement methods to prevent or take down advertisements that violate its policies. Every ad loaded into the Microsoft Advertising system is subject to these enforcement methods, which leverage machine-learning models, automated screening, the expertise of operations team, and dedicated user safety experts. In addition, Microsoft Advertising conducts manual reviews of advertisements flagged to its customer support team and removes advertisements that violate its policies. As set out in Microsoft Advertising's Disinformation policies, the service may use a combination of internal signals and trusted third-party data sources to reject, block, or remove ads or sites that contain disinformation or direct traffic to disinformation content, including blocking at the domain level where landing pages or sites violate policy. During the reporting period, Microsoft Advertising continued to evolve its enforcement methods by applying Microsoft Threat Analysis Center (MTAC) services, including signals related to Foreign Information Manipulation and Influence (FIMI), and actively blocks domains identified through these services as spreading disinformation. In addition to its Disinformation policies, Microsoft Advertising's Misleading Content Policies prohibit advertising content that is misleading, deceptive, fraudulent, or otherwise harmful to users, including ads containing unsubstantiated claims or false endorsements or affiliations. Microsoft Advertising also applies Relevance and Quality Policies to manage the quality and accuracy of ads served across its network, including by deterring tactics that misrepresent the origin or intent of advertised content.
Measure 2.3	
QRE 2.3.1	Please see QRE 2.2.1. Microsoft blocks sites or domains that our Microsoft Threat Analysis Center (MTAC) deems as spreading Disinformation. Microsoft also rejects all ads associated with such domains and instructs its publishing partners to block ads from showing on such domains.
SLI 2.3.1	Methodology of data measurement [suggested character limit: 500 characters] Microsoft Advertising removed ads after they were shown to consumers during the reporting period. Ads prohibited are the same as Blocked ads. Both removals and ad prohibitions are applied globally.

Data	Number of ads removed	Number of ads prohibited *Same as Blocked Ads in SLI 2.1.1*
Global	117,499	512,442
Measure 2.4		
QRE 2.4.1	Outline relevant actions [suggested character limit: 2000 characters] Microsoft Advertising informs advertiser customers of policy violations and editorial decisions through multiple channels to ensure timely notice and transparency. • Prompts in the campaign User Interface (UI) • Email notification (for example, for account suspension) • Notifications from the assigned account representatives, as applicable. Advertisers are provided with the opportunity to appeal editorial decisions through Microsoft Advertising's established conflict-resolution process. Appeals may be submitted by the advertiser following notification of a policy violation and are reviewed to assess whether the ad complies with applicable advertising policies. The appeal process allows advertisers to request reconsideration of disapproved ads, suspended campaigns, or other enforcement actions and is designed to provide a consistent and structured mechanism for resolving disputes related to editorial outcomes. Appeals are evaluated by trained review teams in accordance with Microsoft Advertising policies and procedures. Where an appeal is upheld, the relevant enforcement action is reversed or modified as appropriate. Where an appeal is not upheld, the original decision remains in effect. This appeals framework applies uniformly across markets and does not involve election-specific review programs or workflows. Microsoft Advertising provides publicly available guidance describing the advertiser appeal process here: How do I challenge a disapproval?	
SLI 2.4.1	Methodology of data measurement [suggested character limit: 500 characters] During the reporting period, Microsoft Advertising transitioned from reporting aggregate appeal events to reporting appeals at the individual customer level. This methodological change was implemented to support Member State-level reporting by enabling appeals to be attributed to the customer account associated with the original editorial decision, rather than counted only in aggregate across the platform.	
Data	Number of appeals	Number appeals that led to a change of the initial decision
Member State		
Austria	47	27
Belgium	193	49
Bulgaria	32	10
Croatia	17	5
Cyprus	69	28
Czech Republic	127	55
Denmark	292	45

Estonia	161	29
Finland	97	13
France	818	215
Germany	973	386
Greece	24	13
Hungary	28	12
Ireland	54	24
Italy	295	109
Latvia	32	10
Lithuania	30	12
Luxembourg	5	3
Malta	19	7
Netherlands	261	107
Poland	294	119
Portugal	41	15
Romania	275	36
Slovakia	59	22
Slovenia	9	5
Spain	358	113
Sweden	72	40
Iceland	1	0
Liechtenstein	3	0
Norway	96	29
Total EU	4,682	1,509
Total EEA	4,782	1,538

III. Political Advertising	
Commitment 5 Relevant Signatories commit to apply a consistent approach across political and issue advertising on their services and to clearly indicate in their advertising policies the extent to which such advertising is permitted or prohibited on their services. [change wording if adapted]	
Measure 5.1	
QRE 5.1.1	Outline relevant actions [suggested character limit: 2000 characters]

	Microsoft Advertising policies prohibit ads for election-related content, political candidates, parties, ballot measures, and political fundraising globally, including fundraising for political candidates, parties, political action committees (PACs), and ballot measures. These restrictions apply across Microsoft-owned and third-party services that rely on Microsoft Advertising to serve ads. Microsoft Advertising also prohibits certain issue-based advertising, including ads that exploit political agendas, sensitive political or religious issues, or "hot-button" topics, as well as ads that promote extreme political or religious agendas or are associated with hate, criminal, or terrorist activities, regardless of the advertiser's stated intent. In September 2025, Microsoft Advertising updated its policies to address European Union Regulation (EU) 2024/900, reflecting new requirements applicable to ads served in the EU. See here: Political content and Religious content.

III. Political Advertising	
Commitment 7 Relevant Signatories commit to put proportionate and appropriate identity verification systems in place for sponsors and providers of advertising services acting on behalf of sponsors placing political or issue ads. Relevant signatories will make sure that labelling and user-facing transparency requirements are met before allowing placement of such ads.	
Measure 7.3	
QRE 7.3.1	Outline relevant actions [suggested character limit: 2000 characters] Microsoft Advertising policies prohibit ads for election-related content, political candidates, parties, ballot measures, and political fundraising globally, including fundraising for political candidates, parties, political action committees (PACs), and ballot measures. These restrictions apply across Microsoft-owned and third-party services that rely on Microsoft Advertising to serve ads. Microsoft Advertising also prohibits certain issue-based advertising, including ads that exploit political agendas, sensitive political or religious issues, or "hot-button" topics, as well as ads that promote extreme political or religious agendas or are associated with hate, criminal, or terrorist activities, regardless of the advertiser's stated intent. In September 2025, Microsoft Advertising updated its policies to address European Union Regulation (EU) 2024/900, reflecting new requirements applicable to ads served in the EU. See here: Political content and Religious content.

QRE 7.3.2	Outline relevant actions [suggested character limit: 2000 characters] Microsoft Advertising does not offer its advertising services to customers or partners seeking to promote political content. For example, political parties are informed by customer support that political advertising campaigns are not permitted on the Microsoft Advertising network. To support compliance with EU Regulation (EU) 2024/900, Microsoft Advertising updated its political advertising policies and introduced a declaration requirement for campaigns targeting the European Union. Advertisers must declare whether a campaign is intended for political advertising prior to campaign or creative creation or import. This requirement applies to all campaigns as of 10 October 2025. Campaigns or creatives declared as intended for political advertising are not permitted to proceed under Microsoft Advertising policies. See here: Political content. Microsoft Advertising employs dedicated operational and engineering resources to enforce restrictions on political advertising using both proactive and reactive measures. Proactively, Microsoft Advertising applies automated processes to identify and block political ads from serving across its advertising network, including restrictions based on specific terms and domains. For example, Microsoft Advertising maintains lists of terms associated with known political parties, candidates, and ballot measures and blocks ads that would otherwise serve in response to searches for those terms. Reactively, if Microsoft Advertising becomes aware that an ad suspected of violating policy is being served, for example, through a report submitted to customer support—the ad is promptly reviewed. Ads found to violate Microsoft Advertising policies are removed. Users may report ads that may violate Microsoft Advertising policies through publisher-specific reporting tools or via this form: Report a Concern | Microsoft Advertising. These actions apply across all websites that use Microsoft Advertising to serve ads, including Microsoft-owned and operated properties (such as Bing) and third-party websites.

VIII. Transparency Centre	
Commitment 34 To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website.	
Measure 34.3	

VIII. Transparency Centre	
Commitment 35 Signatories commit to ensure that the Transparency Centre contains all the relevant information related to the implementation of the Code's Commitments and Measures and that this information is presented in an easy-to-understand manner, per service, and is easily searchable.	
Measure 35.1	
Measure 35.2	
Measure 35.3	

IX. Permanent Taskforce	
Commitment 37 Signatories commit to participate in the permanent Taskforce. The Taskforce 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 Taskforce can also invite relevant experts as observers to support its work. Decisions of the Taskforce are made by consensus.	
Measure 37.1	
Measure 37.4	
Measure 37.5	
Measure 37.6	

QRE 37.6.1	Outline relevant actions [suggested character limit: 2000 characters] Microsoft Advertising has actively engaged in and contributed to all the Task-force Plenary meetings as well as to the meetings of all Subgroups and Working Groups relevant to its subscription that were active during this reporting cycle.

X. Monitoring of Code	
Commitment 40 Signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code's Commitments and Measures by each Signatory, service and at Member State level.	
Measure 40.2	
Measure 40.3	

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.

Reporting on the service's response during a period of crisis

Reporting on the service's response during a crisis

War of aggression by Russia on Ukraine

Threats observed or anticipated at time of reporting: [suggested character limit 2000 characters].

As an online advertising network, Microsoft Advertising may be subject to attempted misuse of its services in ways that could contribute to the dissemination or monetisation of disinformation. These risks primarily arise in two forms: the placement of misleading or deceptive advertising content, and the potential funnelling of advertising revenue to websites or domains that spread disinformation.

Threat actors may seek to exploit advertising systems by promoting ads containing false or misleading claims, by masking political or issue-based messaging as commercial content, or by directing users to external sites that host disinformation. In some cases, such activity may form part of broader, coordinated influence operations, including those associated with foreign information manipulation efforts.

Microsoft Advertising also anticipates ongoing efforts by malicious actors to evade detection through tactics such as frequent changes to domains, use of intermediary landing pages, keyword obfuscation, or rapid iteration of ad creatives. These risks may be heightened during elections, major geopolitical events, or periods of heightened public attention, when incentives to influence public discourse or monetise misleading narratives increase.

Consistent with trends observed across the advertising ecosystem, Microsoft Advertising recognises that such threats are not static and continues to evolve its policies, enforcement mechanisms, and detection capabilities to address emerging tactics and risks.

Mitigations in place at time of reporting: [suggested character limit: 2000 characters].

As set out in QRE 1.1.1, Microsoft Advertising continues to evolve its disinformation-detection methods. In 2025, Microsoft Advertising expanded detection by applying Microsoft Threat Analysis Center (MTAC) services to support identification of domains associated with Foreign Information Manipulation and Influence (FIMI). MTAC operates within Microsoft's coordinated threat-intelligence structure, alongside the Microsoft Threat Intelligence Center (MSTIC) and the Digital Crimes Unit (DCU). MTAC is Microsoft's dedicated center for detecting, assessing, and disrupting global digital threats, with a particular focus on foreign malign influence operations targeting customers, public institutions, and democratic processes, and it supports Microsoft, governments, and select commercial customers.

While MSTIC focuses on technical cyber threats and malicious actors, MTAC adds a geopolitical and influence-operations lens, analysing propaganda, coordinated information operations, and state-backed manipulation campaigns. MTAC combines human intelligence, language and regional expertise, influence-operations analysis, and technical telemetry to support the identification of domains and web properties associated with disinformation. Microsoft Advertising consumes regular domain and web-property intelligence feeds derived from this work to assist in detecting non-compliant ads and publishers across its network.

Microsoft Advertising also restricts advertising related to sensitive or high-profile events under its Critical Events policy. This policy allows Microsoft Advertising to remove or limit advertising in response to such events to prevent commercial exploitation and to protect user safety.

In addition, Microsoft Advertising has further optimised its detection methods to identify evolving tactics closely associated with disinformation, including misinformation and impersonation content. Microsoft Advertising's approach prioritises early, preventive enforcement, with the objective of stopping non-compliant advertising content prior to delivery. As a result, a significant portion of enforcement actions now occur at or before demand creation, rather than after impressions or page views have occurred, reflecting platform improvements implemented during the reporting period to reduce user exposure to harmful or misleading content at the earliest possible stage.

[Note: Signatories are requested to provide information relevant to their particular response to the threats and challenges they observed on their service(s). They ensure that the information below provides an accurate and complete report of their relevant actions. As operational responses to crisis/election situations can vary from service to service, an absence of information should not be considered a priori a shortfall in the way a particular service has responded. Impact metrics are accurate to the best of signatories' abilities to measure them].		
Policies and Terms and Conditions		
Outline any changes to your policies		
Policy	**Changes (such as newly introduced policies, edits, adaptation in scope or implementation)**	**Rationale**
Information integrity and misleading content **Critical Events**	Microsoft Advertising did not introduce new policies or additional measures specific to this crisis during the reporting period.	No changes or new policies or measures were introduced because the existing policy framework and enforcement measures continue to operate effectively. Microsoft Advertising continues to prevent serving advertising related to the Ukrainian crisis pursuant to its Critical Events policy, which allows Microsoft Advertising to remove or limit advertising in response to a sensitive or high-profile news event to prevent commercial exploitation and to ensure user safety. In addition, Microsoft Advertising's Information integrity and misleading content policies prohibit advertising that is misleading, deceptive, fraudulent, or otherwise harmful to its users, including advertisements that spread disinformation. Microsoft Advertising also requires its syndication partners (i.e., partners that display Microsoft Advertising advertisements on their services) to comply with strict brand safety policies to prevent advertising revenue from flowing to websites engaging in misleading, deceptive, harmful, or insensitive behaviours. Microsoft Advertising publisher policies include a comprehensive list of prohibited content against which ads may not serve, including, but not limited to, sensitive political content (e.g., extreme, aggressive, or misleading interpretations of news, events, or individuals), and unsavoury content (such as content disparaging individuals or organisations). Partner properties that violate these policies are removed from our network until the partner remedies the issue. Separately, Microsoft Advertising continues to enforce its prohibition on advertising from Russia Today (RT) and Sputnik across our advertising network and does not place ads on their sites.
Scrutiny of Ad Placements		
Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.		

Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention Microsoft continues to prevent the serving of advertising related to the war of aggression by Russia on Ukraine pursuant to its Critical Events policy. Under this policy, Microsoft Advertising may remove or limit advertising in response to a sensitive or high-profile news event to prevent the commercial exploitation of such events and to ensure user safety. In addition, Microsoft Advertising's Information integrity and misleading content policies prohibit advertising that is misleading, deceptive, fraudulent, or otherwise harmful to its users, including advertisements that spread disinformation. Microsoft Advertising also requires its syndication partners (i.e., partners that display Microsoft Advertising advertisements on their services) to comply with strict brand safety policies to prevent advertising revenue from flowing to websites engaging in misleading, deceptive, harmful, or insensitive behaviours. Microsoft Advertising publisher policies include a comprehensive list of prohibited content against which ads may not serve, including, but not limited to, sensitive political content (e.g., extreme, aggressive, or misleading interpretations of news, events, or individuals), and unsavoury content (such as content disparaging individuals or organisations). Partner properties that violate these policies are removed from our network until the partner remedies the issue.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available During the reporting period, Microsoft Advertising maintained blocks on ads associated with 736 search queries in all markets and blocked no additional web domains across its network, leaving the total of blocked domains at 2,791. Microsoft Advertising maintained the suspension of all 1,483 Russian-based advertisers imposed prior to the reporting period and did not onboard any new Russian-based advertisers during the reporting period.
Political Advertising	
Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.	
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention Not applicable. As described in Section 3 of the report, Microsoft Advertising does not support political advertising.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available N/A

Reporting on the service's response during a crisis

Israel–Hamas conflict

Threats observed or anticipated at time of reporting: [suggested character limit 2000 characters].

As an online advertising network, Microsoft Advertising may be subject to attempted misuse of its services in ways that could contribute to the dissemination or monetisation of disinformation. These risks primarily arise in two forms: the placement of misleading or deceptive advertising content, and the potential funnelling of advertising revenue to websites or domains that spread disinformation.

Threat actors may seek to exploit advertising systems by promoting ads containing false or misleading claims, by masking political or issue-based messaging as commercial content, or by directing users to external sites that host disinformation. In some cases, such activity may form part of broader, coordinated influence operations, including those associated with foreign information manipulation efforts.

Microsoft Advertising also anticipates ongoing efforts by malicious actors to evade detection through tactics such as frequent changes to domains, use of intermediary landing pages, keyword obfuscation, or rapid iteration of ad creatives. These risks may be heightened during elections, major geopolitical events, or periods of heightened public attention, when incentives to influence public discourse or monetise misleading narratives increase.

Consistent with trends observed across the advertising ecosystem, Microsoft Advertising recognises that such threats are not static and continues to evolve its policies, enforcement mechanisms, and detection capabilities to address emerging tactics and risks.

Mitigations in place at time of reporting: [suggested character limit: 2000 characters].

As set out in QRE 1.1.1, Microsoft Advertising continues to evolve its disinformation-detection methods. In 2025, Microsoft Advertising expanded detection by applying Microsoft Threat Analysis Center (MTAC) services to support identification of domains associated with Foreign Information Manipulation and Influence (FIMI). MTAC operates within Microsoft's coordinated threat-intelligence structure, alongside the Microsoft Threat Intelligence Center (MSTIC) and the Digital Crimes Unit (DCU). MTAC is Microsoft's dedicated centre for detecting, assessing, and disrupting global digital threats, with a particular focus on foreign malign influence operations targeting customers, public institutions, and democratic processes, and it supports Microsoft, governments, and select commercial customers.

While MSTIC focuses on technical cyber threats and malicious actors, MTAC adds a geopolitical and influence-operations lens, analysing propaganda, coordinated information operations, and state-backed manipulation campaigns. MTAC combines human intelligence, language and regional expertise, influence-operations analysis, and technical telemetry to support the identification of domains and web properties associated with disinformation. Microsoft Advertising consumes regular domain and web-property intelligence feeds derived from this work to assist in detecting non-compliant ads and publishers across its network.

Microsoft Advertising also restricts advertising related to sensitive or high-profile events under its Critical Events policy. This policy allows Microsoft Advertising to remove or limit advertising in response to such events to prevent commercial exploitation and to protect user safety.

In addition, Microsoft Advertising has further optimised its detection methods to identify evolving tactics closely associated with disinformation, including misinformation and impersonation content. Microsoft Advertising's approach prioritises early, preventive enforcement, with the objective of stopping non-compliant advertising content prior to delivery. As a result, a significant portion of enforcement actions now occur at or before demand creation, rather than after impressions or page views have occurred, reflecting platform improvements implemented during the reporting period to reduce user exposure to harmful or misleading content at the earliest possible stage.

[Note: Signatories are requested to provide information relevant to their particular response to the threats and challenges they observed on their service(s). They ensure that the information below provides an accurate and complete report of their relevant actions. As operational responses to crisis/election situations can vary from service to service, an absence of information should not be considered a priori a shortfall in the way a particular service has responded. Impact metrics are accurate to the best of signatories' abilities to measure them].		
Policies and Terms and Conditions		
Outline any changes to your policies		
Policy	**Changes (such as newly introduced policies, edits, adaptation in scope or implementation)**	**Rationale**
Information integrity and misleading content **Critical Events**	Microsoft Advertising has not implemented changes to its policies or introduced further measures specific to this crisis since the last reporting period.	No changes or new policies or measures were introduced due to the effectiveness of the measures already implemented. Microsoft Advertising continues to prevent serving advertising related to the Israel–Hamas conflict pursuant to its Critical Events policy, which allows Microsoft Advertising to remove or limit advertising in response to a sensitive or high-profile news event to prevent commercial exploitation and to ensure user safety. In addition, Microsoft Advertising's Information integrity and misleading content policies prohibit advertising that is misleading, deceptive, fraudulent, or otherwise harmful to its users, including advertisements that spread disinformation. Microsoft Advertising also requires its syndication partners (i.e., partners that display Microsoft Advertising advertisements on their services) to comply with strict brand safety policies to prevent advertising revenue from flowing to websites engaging in misleading, deceptive, harmful, or insensitive behaviours. Microsoft Advertising publisher policies include a comprehensive list of prohibited content against which ads may not serve, including, but not limited to, sensitive political content (e.g., extreme, aggressive, or misleading interpretations of news, events, or individuals), and unsavoury content (such as content disparaging individuals or organisations). Partner properties that violate these policies are removed from our network until the partner remedies the issue.
Microsoft Advertising *Microsoft Advertising has not introduced specific policies related to this crisis, as it considers existing measures discussed throughout this report to sufficiently mitigate risks related to the crisis.*		
Scrutiny of Ad Placements		

Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.	
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention Microsoft continues to prevent the serving of advertising related to the Israel–Hamas conflict pursuant to its Critical Events policy. Under this policy, Microsoft Advertising may remove or limit advertising in response to a sensitive or high-profile news event to prevent the commercial exploitation of such events and to ensure user safety. In addition, Microsoft Advertising's Information integrity and misleading content policies prohibit advertising that is misleading, deceptive, fraudulent, or otherwise harmful to its users, including advertisements that spread disinformation. Microsoft Advertising also requires its syndication partners (i.e., partners that display Microsoft Advertising advertisements on their services) to comply with strict brand safety policies to prevent advertising revenue from flowing to websites engaging in misleading, deceptive, harmful, or insensitive behaviours. Microsoft Advertising publisher policies include a comprehensive list of prohibited content against which ads may not serve, including, but not limited to, sensitive political content (e.g., extreme, aggressive, or misleading interpretations of news, events, or individuals), and unsavoury content (such as content disparaging individuals or organisations). Partner properties that violate these policies are removed from our network until the partner remedies the issue.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available During the reporting period, Microsoft Advertising maintained blocks on ads associated with 36 search queries in all markets and blocked no additional web domains across its network, leaving the total of blocked domains at 3.
Political Advertising	
Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.	
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention Not applicable. As described in Section 3 of the report, Microsoft Advertising does not support political advertising.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available N/A

Reporting on the service’s response during an election

Reporting on the service's response during an election

European national elections (Germany, Romania, Portugal, Poland, Czech Republic, Ireland, Netherlands)

Threats observed or anticipated at time of reporting: [suggested character limit 2000 characters].

As an online advertising network, Microsoft Advertising recognises that election periods are commonly associated with heightened attempts to exploit advertising ecosystems to influence public discourse or monetise misleading narratives. In general, such risks may include attempts to place misleading or deceptive advertising content, to disguise political or issue-based messaging as commercial advertising, or to direct users to external websites that host election-related disinformation.

However, Microsoft Advertising does not support political or issue-based advertising, including election-related advertising. As a result, Microsoft Advertising does not provide a paid advertising vector through which election-specific disinformation campaigns could be promoted or amplified during the European national elections listed above.

Microsoft Advertising nonetheless anticipates that malicious actors may attempt to test or circumvent advertising restrictions during election periods, for example by masking political messaging as commercial content, using indirect or intermediary landing pages, or rapidly iterating creatives or domains to evade detection. Such attempted misuse is consistent with broader trends observed across the digital advertising ecosystem during periods of heightened public attention, including elections.

Given Microsoft Advertising's policy posture, these risks are primarily limited to attempted or indirect misuse, rather than sustained or systemic election-related advertising activity.

Mitigations in place – or planned - at time of reporting: [suggested character limit: 2000 characters].

Microsoft Advertising's standing policies prohibit political and issue-based advertising globally, including advertising intended to influence electoral outcomes, voting behaviour, or public opinion on political or social issues. These prohibitions apply consistently during election periods and materially limit the risk of election-related disinformation being disseminated or monetised through Microsoft Advertising.

In addition, Microsoft Advertising applies its existing enforcement mechanisms for misleading, deceptive, or harmful advertising content, including automated and manual review processes designed to identify attempts to circumvent policy restrictions. These baseline controls are continuously applied and are considered sufficient to address attempted misuse during election periods without the need for election-specific mitigations.

No additional election-specific mitigation measures were introduced or planned for the European national elections listed above, as Microsoft Advertising's existing policies and enforcement framework are designed to operate effectively during periods of heightened risk.

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

Policies and Terms and Conditions

Outline any changes to your policies

Policy	**Changes (such as newly introduced policies, edits,**	**Rationale**

	adaptation in scope or implementation)	
Political content	Updated to incorporate advertiser declaration requirements under EU Regulation 2024/900.	Microsoft Advertising updated its political content policy to incorporate requirements under EU Regulation 2024/900 on the transparency and targeting of political advertising, which entered into force in October 2025. These updates introduced a declaration requirement for advertisers targeting the EU to confirm whether campaigns or creatives are intended for political advertising The change was procedural in nature and did not alter Microsoft Advertising's longstanding prohibition on political or issue-based advertising. Accordingly, the update was not related to European national elections or election-specific advertising activity.
Scrutiny of Ad Placements		
Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.		
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention Microsoft Advertising applies proactive ad-placement scrutiny to prevent the submission or serving of political advertising, including election-related advertising, consistent with its global prohibition on political and issue-based ads. During election periods, this scrutiny includes maintaining keyword- and phrase-level blocks associated with election candidates and political parties to prevent attempted submissions of political advertising through the Microsoft Advertising platform. These controls are applied uniformly across the advertising network and are designed to prevent advertisers from submitting ads related to election candidates or parties, including attempts to disguise political messaging as commercial advertising. This approach relies on global political blocks that apply across all markets, together with ongoing enhancements to automated detection of political content and does not involve election-specific advertising programs or placement workflows. Where detection gaps are identified, Microsoft Advertising retains the ability to implement market-specific keyword and phrase blocks as needed.	
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available During the reporting period, Microsoft Advertising maintained keyword- and phrase-level blocks related to election candidates and political parties in several European markets. No new election-related blocks were added in 2025. The following election-related blocks were in place during the reporting period: • Germany: 54 election candidates and parties blocked (existing blocks; no updates in 2025)	

	• Portugal: 17 election candidates and parties blocked (existing blocks; no updates in 2025) • Romania: 19 election candidates and parties blocked (existing blocks; no updates in 2025) • Ireland: 78 election candidates and parties blocked (existing blocks; no updates in 2025) No election related blocks were in place for the Poland, Czech Republic, or Netherlands markets during the reporting period.
Political Advertising	
Outline approaches pertinent to this chapter, highlighting similarities/commonalities and differences with regular enforcement.	
Specific Action applied (with reference to the Code's relevant Commitment and Measure)	Description of intervention Not applicable. Microsoft Advertising does not support political advertising.
	Indication of impact (at beginning of action: expected impact) including relevant metrics when available Not applicable.