### Code of Practice on Disinformation Baseline Report – January 2023 Microsoft

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#### **Executive Summary**

Microsoft is pleased to file this report on our compliance with the commitments of the strengthened 2022 EU Code of Practice on Disinformation. At Microsoft, we have been committed to instilling trust and security across our products and services, and across the broader web, as outlined in our 2019 report on the first iteration of the Code of Practice. We continue to recognise that fighting disinformation is a key element to creating a trustworthy and safe online environment and continue to increase our efforts to counter these threats. We also recognise that there is not a one size fits all approach to this work, and instead there needs to be a whole of society strategy that recognises that not all people or platforms are the same and that different measures may be more effective than others in improving the information environment for all of our users.

In 2018, Microsoft launched the Democracy Forward Initiative (previously known as the Defending Democracy Program) to coordinate and track the work undertaken across the company on protecting and strengthening democratic institutions. The Democracy Forward team leverages Microsoft's role as a business and software provider to increase our clients and users' ability to counter external efforts that compromise a healthy information ecosystem.

In June 2022, Microsoft announced the first Information Integrity Principles. These principles were adopted across all impacted Microsoft products and teams to ensure an enterprise approach to information integrity while also recognising the immense diversity across the company. These principles establish a foundational set of commitments that teams can use to inform their policy, product development and risk assessment work. The four information integrity principles are:

- Freedom of Expression: We will respect freedom of expression and uphold our customers' ability to create, publish, and search for information via our platforms, products, and services.
- Authoritative Content: We will prioritise surfacing content to counter foreign cyber influence operations by utilising internal and trusted third-party data on our products.
- Demonetisation: We will not wilfully profit from foreign cyber influence content or actors.
- Proactive Efforts: We will proactively work to prevent our platforms and products from being used to amplify foreign cyber influence sites and content.

Additionally, Microsoft released a report entitled "<u>Defending Ukraine</u>: <u>Early Lessons from the Cyber War</u>" in June 2022. The report exposed the expansive cyber war, both cyber-attacks and information operations, Russia is pursuing against Ukraine and its allies. In a follow up <u>blog post</u> released in December, Microsoft further outlined Russian cyber operations including influence operations looking to leverage energy and food supply concerns across Europe to weaken the alliance against the Russian invasion. To address these threats, Microsoft developed a whole of society approach to mitigate the risk of foreign information operations:

- Detect: Collectively hunt, track, and investigate foreign perpetrators of disinformation—much like is done
  for foreign cyber actors. Pull together disparate efforts, often operating in company silos, and not
  integrated into the broader cybersecurity community.
- Disrupt: Leverage threat intel to disrupt operations, much like the successful takedown of ransomware operators. In addition to operation disruptions, it's essential to choke off the financial supply to known foreign disinformation sites, whether via ad placements, traffic sources, or otherwise.
- Defend: Build consumer facing technology with information integrity as a key principle. Foster innovation and research to enable more responsible technology. Build a more resilient society through programs and technology that encourage critical news consumption.
- Deter: Secure international norms that create a standard of behaviour for nation-state information campaigns, particularly for those that touch on topics of fundamental human rights, such as healthcare.

Along with these new strategies, in July 2022 Microsoft announced the acquisition of Miburo Solutions, a cyber threat analysis and research company specialising in the detection of and response to foreign information influence

operations. Working in close collaboration with the Microsoft Threat Intelligence Center (MSTIC), this new Microsoft Digital Threat Analysis Center (DTAC) has enabled Microsoft to expand its threat detection and analysis capabilities to shed light on the ways in which foreign actors use information operations in conjunction with cyber-attacks to achieve their objectives.

Microsoft strives to provide our customers a positive online experience free from deceptive advertisements. Microsoft is working across our services to achieve this goal through policies and enforcement processes aimed at ensuring that the advertising and content served is clear, truthful, and accurate. All of Microsoft's services that display advertising have adopted and vigorously enforce policies prohibiting disinformation. Microsoft's company-wide commitment to disrupting the economics of disinformation is well-illustrated by Microsoft Advertising, our proprietary advertising platform, which serves the vast majority of ads displayed on Bing Search and provides advertising to most other Microsoft services that display ads, as well as many third-party services. Microsoft Advertising works both with advertisers, who provide it with advertising content, and publishers, such as Bing Search, who display these advertisements on their services. Microsoft Advertising employs a distinct set of policies and enforcement measures with respect to each of these two categories of business partners to prevent the spread of disinformation through advertising.

Bing Search is an online search engine with the primary objective of connecting users with the most relevant search results from the web. Users come to Bing with a specific research topic in mind and expect Bing to provide links to the most relevant and authoritative third-party websites on the Internet that are responsive to their search terms. Therefore, addressing misinformation in organic search results often requires a different approach than may be appropriate for other types of online services. Blocking content in organic search results based solely on the truth or falsity of the content can raise significant concerns relating to fundamental rights of freedom of expression and the freedom to receive and impart information. Instead of blocking access to content, Bing focuses on ranking its organic search results so that trusted, authoritative news and information appears first and provides tools to help its users evaluate the trustworthiness of certain sites and ensure they are not misled or harmed by the content that appears in search results. In addition to user tools, Bing has also provided search-related data to the research community and is actively pursuing research partnerships aimed at ensuring regular and consistent access to data for researchers studying misinformation.

LinkedIn is a real identity online social networking service for professionals to connect and interact with other professionals, to grow their professional network and brand, and to seek career development opportunities. LinkedIn is part of its members' professional identity and has a specific purpose. Activity on the platform and content members share can be seen by current and future employers, colleagues, potential business partners and recruitment firms, among others. Given this audience, members by and large tend to limit their activity to professional areas of interest and expect the content they see to be professional in nature. LinkedIn is committed to keeping its platform safe, trusted, and professional and respects the laws that apply to its services. On joining LinkedIn, members agree to abide by LinkedIn's <u>User Agreement</u> and its <u>Professional Community Policies</u>, which expressly forbid members from posting information that is intentionally deceptive or misleading.

Unless stated otherwise, data provided under this report covers a reporting period of one month ("Reporting Period" or "Period"), either for the period of 1-31 December 2022 or mid-December 2022 to mid-January 2023.

### Subscription per Service overview

Commitments	Measures	LinkedIn	Microsoft Advertising	Bing Search	Microsoft Corporation		
	II. Scrutiny of Ad Placements						
	Measure 1.1	×	$\boxtimes$				
	Measure 1.2	$\boxtimes$	$\boxtimes$				
1	Measure 1.3	$\boxtimes$	$\boxtimes$				
ı	Measure 1.4	×					
	Measure 1.5	×	$\boxtimes$				
	Measure 1.6	$\boxtimes$	$\boxtimes$				
	Measure 2.1	$\boxtimes$	$\boxtimes$				
2	Measure 2.2	$\boxtimes$	$\boxtimes$				
۷	Measure 2.3	×	$\boxtimes$				
	Measure 2.4	×	$\boxtimes$				
	Measure 3.1	×	$\boxtimes$				
3	Measure 3.2	×	×				
	Measure 3.3	×	×				
		III. Political	advertising				
	Measure 4.1	$\boxtimes$	$\boxtimes$				
4	Measure 4.2	×	$\boxtimes$				
5	Measure 5.1	$\boxtimes$	$\boxtimes$				
	Measure 6.1						
6	Measure 6.2						
	Measure 6.3						
	Measure 6.4						
	Measure 6.5						
	Measure 7.1						
7	Measure 7.2						
7	Measure 7.3	×	×				
	Measure 7.4						
0	Measure 8.1						
8	Measure 8.2						
9	Measure 9.1						
<b>9</b>	Measure 9.2						
10	Measure 10.1						
10	Measure 10.2						
	Measure 11.1						
11	Measure 11.2						
11	Measure 11.3						
	Measure 11.4						
	Measure 12.1						
12	Measure 12.2						
	Measure 12.3						
13	Measure 13.1						
15	Measure 13.2						

	Mongues 12.2	П	П	П		
	Measure 13.3	IV lasts suits				
			of services	_	_	
	Measure 14.1					
14	Measure 14.2					
	Measure 14.3					
15	Measure 15.1					
	Measure 15.2			$\boxtimes$		
16	Measure 16.1					
	Measure 16.2					
		V. Empowe	ering users			
	Measure 17.1					
17	Measure 17.2			⊠		
	Measure 17.3			⊠		
	Measure 18.1					
18	Measure 18.2	$\boxtimes$		×		
	Measure 18.3	$\boxtimes$		$\boxtimes$		
19	Measure 19.1	$\boxtimes$		$\boxtimes$		
	Measure 19.2	$\boxtimes$		$\boxtimes$		
20	Measure 20.1	$\boxtimes$		$\boxtimes$		
20	Measure 20.2	$\boxtimes$		$\boxtimes$		
	Measure 21.1	$\boxtimes$		$\boxtimes$		
21	Measure 21.2	$\boxtimes$				
	Measure 21.3	$\boxtimes$		$\boxtimes$		
	Measure 22.1	$\boxtimes$				
	Measure 22.2	$\boxtimes$		$\boxtimes$		
	Measure 22.3	$\boxtimes$		$\boxtimes$		
22	Measure 22.4					
	Measure 22.5					
	Measure 22.6					
	Measure 22.7	$\boxtimes$		$\boxtimes$		
23	Measure 23.1	$\boxtimes$		$\boxtimes$		
23	Measure 23.2	$\boxtimes$		$\boxtimes$		
24	Measure 24.1	$\boxtimes$				
25	Measure 25.1					
23	Measure 25.2					
VI. Empowering the research community						
	Measure 26.1	×		×		
26	Measure 26.2	×		×		
	Measure 26.3	×		×		
	Measure 27.1	$\boxtimes$		×		
27	Measure 27.2	×		×		
21	Measure 27.3	×		×		
	Measure 27.4	$\boxtimes$		×		
	Measure 28.1	×		×		
28	Measure 28.2	×		×		
20	Measure 28.3	×		×		
	Measure 28.4	×		×		

Measure 29.1							
Measure 29.3		Measure 29.1					
Measure 30.1	29	Measure 29.2					
Measure 30.1		Measure 29.3					
Measure 30.2   Measure 30.3   Measure 30.4   Measure 30.4   Measure 30.4   Measure 31.1   Measure 31.2   Measure 31.2   Measure 31.4   Measure 31.4   Measure 31.4   Measure 31.5   Measure 32.2   Measure 32.2   Measure 32.3   Measure 32.4   Measure 34.4   Measure 34.4   Measure 34.4   Measure 34.4   Measure 34.5   Measure 34.5   Measure 34.5   Measure 35.5   Measure 35.5   Measure 35.6   Measure 35.6   Measure 35.6   Measure 36.1   Measure 36.3   Measure 36.3   Measure 36.3   Measure 37.5   Measure 37.6   Meas		VII. Em	powering the fa	ct-checking comr	nunity		
Measure 30.3   Measure 30.4   Measure 31.1   Measure 31.2   Measure 31.3   Measure 31.3   Measure 31.3   Measure 31.4   Measure 31.4   Measure 31.5   Measure 32.1   Measure 32.2   Measure 32.2   Measure 32.3   Measure 33.1   Measure 33.1   Measure 33.2   Measure 33.1   Measure 33.2   Measure 33.4   Measure 34.2   Measure 34.4   Measure 34.5   Measure 34.5   Measure 34.5   Measure 35.5   Measure 35.6   Measure 35.6   Measure 35.6   Measure 35.6   Measure 36.1   Measure 37.2   Measure 37.2   Measure 37.3   Measure 37.4   Measure 37.5   Measure 37.6   Meas		Measure 30.1	$\boxtimes$		×		
Measure 30.4	20	Measure 30.2	⊠		×		
Measure 31.1	30	Measure 30.3	⊠		×		
Measure 31.2   Measure 31.3   Measure 31.4   Measure 31.4   Measure 31.4   Measure 32.1   Measure 32.2   Measure 32.2   Measure 32.3   Measure 32.4   Measure 34.2   Measure 34.2   Measure 34.4   Measure 34.4   Measure 34.5   Measure 34.5   Measure 35.5   Measure 35.5   Measure 35.5   Measure 35.5   Measure 35.5   Measure 35.6   Measure 35.6   Measure 35.6   Measure 35.6   Measure 35.7   Measure 35.8   Measure 35.8   Measure 35.7   Measure 35.8   Measure 35.8   Measure 35.5   Meas		Measure 30.4	⊠		×		
Measure 31.3   Measure 31.4   Measure 32.1   Measure 32.2   Measure 32.2   Measure 32.3   Measure 34.4   Measure 34.4   Measure 34.4   Measure 34.5   Measure 34.5   Measure 35.1   Measure 35.1   Measure 35.2   Measure 35.3   Measure 35.3   Measure 35.5   Measure 35.5   Measure 35.6   Measure 35.6   Measure 35.6   Measure 36.1   Measure 36.2   Measure 37.1   Measure 37.2   Measure 37.2   Measure 37.3   Measure 37.3   Measure 37.5   Measure 37.6   Measure 37.5   Measure 37.6   Measure 37.5   Measure 37.6   Measure 37.5   Measure 37.6   Meas		Measure 31.1	⊠				
Measure 31.3   Measure 32.1   Measure 32.2   Measure 32.2   Measure 32.3   Measure 32.3   Measure 32.3   Measure 32.3   Measure 32.3   Measure 33.1   Measure 34.1   Measure 34.2   Measure 34.2   Measure 34.4   Measure 34.4   Measure 34.5   Measure 34.5   Measure 35.1   Measure 35.2   Measure 35.2   Measure 35.3   Measure 35.3   Measure 35.5   Measure 35.6   Measure 35.6   Measure 36.6   Measure 36.6   Measure 36.7   Measure 37.1   Measure 37.1   Measure 37.1   Measure 37.2   Measure 37.3   Measure 37.4   Measure 37.5   Measure 37.6   Measure 37.5   Measure 37.6   Measure 37.5   Measure 37.5   Measure 37.5   Measure 37.5   Measure 37.5   Measure 37.5   Measure 37.6   Mea	21	Measure 31.2	⊠		×		
Measure 32.1	31	Measure 31.3	$\boxtimes$		$\boxtimes$		
Measure 32.2   Measure 32.3   Measure 33.1   Measure 33.1   Measure 34.1   Measure 34.2   Measure 34.4   Measure 34.5   Measure 35.1   Measure 35.5   Measure 35.6   Measure 35.6   Measure 36.2   Measure 36.3   Measure 37.5   Measure 37.5   Measure 37.5   Measure 37.5   Measure 37.5   Measure 37.6   Meas		Measure 31.4	$\boxtimes$		$\boxtimes$		
Measure 32.3		Measure 32.1	$\boxtimes$		$\boxtimes$		
Measure 33.1	32	Measure 32.2	$\boxtimes$				
Measure 34.1		Measure 32.3	$\boxtimes$		$\boxtimes$		
Measure 34.1	33	Measure 33.1					
Measure 34.2			VIII. Transpa	rency centre			
Measure 34.3							
Measure 34.4							
Measure 34.5	34						
Measure 35.1		Measure 34.4					
Measure 35.2							
Measure 35.3		Measure 35.1					
Measure 35.4							
Measure 35.4	35						
Measure 35.6	35						
Measure 36.1							
Measure 36.2							
Measure 36.3	26						
Measure 37.1	36						
Measure 37.1		Measure 36.3					
Measure 37.2							
Measure 37.3       □       □       □       □         Measure 37.4       □       □       □       □         Measure 37.5       □       □       □       □         Measure 37.6       □       □       □       □         X. Monitoring of the Code							
Measure 37.4 □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □ □							
Measure 37.5       □       □       □       □         Measure 37.6       □       □       □       □         X. Monitoring of the Code	37						
Measure 37.6 □ □ □ □ ☑  X. Monitoring of the Code							
X. Monitoring of the Code							
_		Measure 37.6					
38 - L L L L M	-						
39 - □ □ □ ⊠	39						
Measure 40.1							
Measure 40.2							
40 Measure 40.3	40						
Measure 40.4		IMeasure 40.4	⊔			X	
Measure 40.5						N	
Measure 40.6 □ □ □ ⊠		Measure 40.5					

	Measure 41.1		×
41	Measure 41.2		$\boxtimes$
	Measure 41.3		$\boxtimes$
42	-		$\boxtimes$
43	-		$\boxtimes$
44	-		

# II. Scrutiny of Ad Placements Commitments 1 - 3

#### **II. Scrutiny of Ad Placements**

#### Commitment 1

Relevant signatories participating in ad placements commit to defund the dissemination of disinformation, and improve the policies and systems which determine the eligibility of content to be monetised, the controls for monetisation and ad placement, and the data to report on the accuracy and effectiveness of controls and services around ad placements

	C.1	M 1.1	M 1.2		M 1.3	M 1.4	M 1.5	M 1.6
We signed up to	LinkedIn	LinkedIn	LinkedIn		LinkedIn	LinkedIn	LinkedIn	LinkedIn
the following	Microsoft	Microsoft	Microsoft Adv	vertising	Microsoft		Microsoft	Microsoft
measures of this	Advertising	Advertising			Advertising		Advertising	Advertising
commitment:								
	LinkedIn				Microsoft Adve	ertising		
In line with this	Yes				Yes			
commitment, did								
you deploy new								
implementation								
measures (e.g.								
changes to your								
terms of service,								
new tools, new								
policies, etc)?								
[Yes/No]								
If yes, list these	New Implementation	on Measures			New Implement	ation Measures		
implementation								
measures here.	As outlined below,	LinkedIn:			Microsoft Adver	tising implemented the	following measures:	
	- has imp	lemented and enf	orces policies	concerning	- Revised	policies to prohibit	ads or sites that c	ontain or lead to
	misinform	ation and disinformation	on.		Disinform	nation.		
	- provides i	nformation and tools to	give advertisers	transparency	- Updated	processes and mechanis	sms to enforce such po	licies.
	and contro	ol regarding the placen	nent of their adve	ertising.				

	- has integrated brand safety tools and services.	- Integration of third-party verification systems to demonetise Disinformation across the advertising network.
Do you plan to	Yes	Yes
put further		
implementation		
measures in		
place in the next		
6 months to		
substantially		
improve the		
maturity of the		
implementation		
of this		
commitment?		
If yes, which	Planned Implementation Measures	Planned Implementation Measures
further		
implementation	LinkedIn plans to continue to assess its policies and services and to	Over the next reporting period, Microsoft Advertising plans to:
measures do you	update them as warranted.	- Iterate on the current enforcement processes and procedures by introducing
plan to put in		additional automation mechanisms.
place in the next		- Further streamline data reporting in accordance with the Code's progress in
6 months?		reporting compliance efforts.
		- Assess implications to its current accreditations.
Measure 1.1	LinkedIn	Microsoft Advertising
QRE 1.1.1	LinkedIn prohibits misinformation and disinformation on its platform,	In December 2022, Microsoft Advertising rolled out revised network-wide policies
	whether in the form of organic content or in the form of advertising	to avoid the publishing and carriage of harmful Disinformation and the placement
	content. LinkedIn's <u>Professional Community Policies</u> , which apply to all	of advertising next to Disinformation content. Such policies prohibit ads or sites that
	content on LinkedIn's platform, expressly prohibit false and misleading	contain or lead to Disinformation. To enforce this policy, "We may use a
	content, including misinformation and disinformation:	combination of internal signals and trusted third-party data or information sources
		to reject, block, or take down ads or sites that contain disinformation or send traffic
	- Do not share false or misleading content: Do not share content in a	to pages containing disinformation. We may block at the domain level landing
	way that you know is, or think may be, misleading or inaccurate,	pages or sites that violate this policy."

including misinformation or disinformation. Do not share content to interfere with or improperly influence an election or other civic process. We may prevent you from posting content from sites that are known to produce or contain misinformation. Do not share content that directly contradicts guidance from leading global health organisations and public health authorities; including false information about the safety or efficacy of COVID-19 vaccines. Do not share false content or information, including news stories, as though they are true or likely true. Do not post "deepfake" images or videos of others or otherwise post content that has been manipulated to deceive. Do not share content or endorse someone or something in exchange for personal benefit (including personal or family relationships, monetary payment, free products or services, or other value), unless you have included a clear and conspicuous notice of the personal benefit you receive and have otherwise complied with our Advertising Policies.

LinkedIn provides additional specific examples of false and misleading content that violates its policy via a Help Center article on <u>False or Misleading Content</u>.

LinkedIn's <u>Advertising Policies</u> incorporate the above provision, and similarly prohibit misinformation and disinformation. In addition, LinkedIn's Advertising Policies also prohibit fraudulent and deceptive ads, and require that claims in an ad have factual support:

Fraud and Deception: Ads must not be fraudulent or deceptive. Your
product or service must accurately match the content of your ad. Any
claims in your ad must have factual support. Do not make deceptive
or inaccurate claims about competitive products or services. Do not
imply you or your product are affiliated with or endorsed by others
without their permission. Do not advertise prices or offers that are

Please see <u>here</u> for our main policy page.

SLI 1.1.1 – Numbers by actions enforcing policies above (specify if at page and/or	Of note, unlike some other planto monetise or run ads against revenue share program. Thus, LinkedIn are not able to madvertising revenue via Linkenumber of ads it restricted on Methodology of data measure.  The table below reports met under the misinformation pole (1) the number of ads Linken policies in QRE 1.1.1 between Member State; (2) the number of impression restricted. The metrics are assi primary country targeting of the	tforms, LinkedIn does not allow members st their content, nor does it offer an ad members publishing disinformation on conetise that disinformation or collect dIn. LinkedIn has instead reported the its platform during the period.  The ment arics concerning ads LinkedIn restricted icies in QRE 1.1.1. The metrics include: dIn restricted under the misinformation 1 - 31 December 2022, broken out by EU as those ads received before they were gned to EU Member State based on the ne ad.  The between 1 - 31 December 2022. The ads	on a publisher site in a - "Domain" represents ti least one ad impression State. Since Microsoft A State level, we are pro- current reporting perio	average number of impacted monthly ad impressions Member State. he number of impacted domains which received at n from an individual on a publisher site in a Member advertising block domains globally, not at the Member by by iding the global aggregate number of 96 for the
domain level)	The number of ads LinkedIn restricted under the misinformation policies in QRE 2.1.1 between 1 – 31 December 2022	The number of impressions the ads received before they were restricted	Page	Domain
Level	Ads	Impressions	Page	Domain
Member States				
Austria	0	0	14	
Belgium	0	0	17	

Bulgaria	0	0	0	
Croatia	0	0	0	
Cyprus	0	0	0	
Czech Republic	0	0	1	
Denmark	0	0	7	
Estonia	0	0	0	
Finland	0	0	8	
France	6	0	28	
Germany	3	0	210	
Greece	0	0	0	
Hungary	0	0	0	
Ireland	0	0	34	
Italy	2	0	8,794	
Latvia	0	0	0	
Lithuania	0	0	0	
Luxembourg	0	0	2	
Malta	0	0	0	
Netherlands	0	0	182	
Poland	3	0	1	
Portugal	0	0	0	
Romania	0	0	1	
Slovakia	0	0	0	
Slovenia	0	0	0	
Spain	4	0	28	
Sweden	1	0	3	
Iceland	-	-	0	
Liechtenstein	-	-	0	
Norway	-	-	4	
Total EU	19	0	9,330	
Total EEA	-	-	9,334	
Total Global			-	96

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

	Methodology of data measurement	Methodology of data measurement
	Following the methodology developed by the Task-force Subgroup on Ad Scrutiny, this SLI considers the impressions to ads or sources that were blocked and applies an agreed-upon conversion factor to those impressions.	Following the methodology developed by the Task-force Subgroup on Ad Scrutiny, this SLI considers the impressions to ads or sources that were blocked and applies an agreed-upon conversion factor to those impressions.
SLI 1.1.2 - Preventing the flow of legitimate advertising investment to sites or content that are designated as disinformation	As reported above, LinkedIn restricted 19 ads between 1 - 31 December 2022 under its misinformation policies in QRE 1.1.1.  The ads did not receive any impressions before they were restricted. Because there were no impressions, the estimated Euro value under the methodology is zero.	It should be noted however, that Microsoft Advertising is a "pay per click" (PPC) ad network. This means that advertisers are charged following a click on the ad, and not based on the number of impressions served. We therefore calculated the approximate financial value in the table by using the "blended CPM" value provided by Ebiquity plc. and the following equation:  Impressions x CTR x (CPM/1000); where "CTR" means Click Through Rate, and CPM means "Cost Per Mille."  The reporting period is 16 December 2022 to 16 January 2023.
	Euro value of ads demonetised	Euro value of ads demonetised
Member States		
Austria	0	€ 0.00
Belgium	0	€ 0.01

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

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

Bulgaria	0	€ 0.00
Croatia	0	€ 0.00
Cyprus	0	€ 0.00
Czech Republic	0	€ 0.00
Denmark	0	€ 0.00
Estonia	0	€ 0.00
Finland	0	€ 0.00
France	0	€ 0.00
Germany	0	€ 0.03
Greece	0	€ 0.00
Hungary	0	€ 0.00
Ireland	0	€ 0.00
Italy	0	€ 0.00
Latvia	0	€ 0.00
Lithuania	0	€ 0.00
Luxembourg	0	€ 0.00
Malta	0	€ 0.00
Netherlands	0	€ 0.12
Poland	0	€ 0.00
Portugal	0	€ 0.00
Romania	0	€ 0.00
Slovakia	0	€ 0.00
Slovenia	0	€ 0.00
Spain	0	€ 0.00
Sweden	0	€ 0.02
Iceland	-	€ 0.00
Liechtenstein	-	€ 0.00
Norway	-	€ 0.00
Total EU	0	€ 0.18
Total EEA	-	€ 0.18

Measure 1.2	LinkedIn	Microsoft Advertising
QRE 1.2.1	LinkedIn does not offer an ad revenue share program and does not allow third-parties to monetise content they post to LinkedIn by running ads against it.  LinkedIn displays ads in two environments: (1) on the LinkedIn platform, which accounts for the vast majority of ads; and (2) on the LinkedIn Audience Network, which allows LinkedIn advertisers to extend their reach to professionals on a curated network of sixteen-hundred third-party publishers selected by LinkedIn (for example, Nasdaq.com, CNN.com, Vogue.com, Realtor.com, Science.org).  With respect to the first category – ads displayed on the LinkedIn platform – as noted in response to QRE 1.1.1, unlike other platforms, LinkedIn does not offer a content monetisation or an ad revenue share program. Thus, no member content is monetised or demonetised, and there is no ability for a member publishing disinformation to collect any advertising revenue share from LinkedIn.  With respect to the second category – ads displayed on the LinkedIn Audience Network – LinkedIn takes a number of steps to help ensure LinkedIn advertisers' ads appear in a trusted environment and that publishers that systematically provide harmful disinformation are not included in the LinkedIn Audience Network.  - First, the LinkedIn Audience Network is a curated network of third-party sites and apps selected by LinkedIn. LinkedIn Audience Network and display ads; rather, LinkedIn selects the publishers that are included in the network.  - Second, LinkedIn has integrated with partners, such as Integral Ad Science and DoubleVerify, to help monitor the quality and brand safety	Microsoft Advertising works with selected, trustworthy publishing partners and requires these partners to abide by strict brand safety-oriented policies to avoid providing revenue streams to websites engaging in misleading, deceptive, harmful, or insensitive behaviors. These publishers also benefit from the set of measures identified above that Microsoft Advertising takes with regard to advertisers, which ensures that these partners receive high-integrity, non-deceptive ads from the Microsoft Advertising platform.  Microsoft Advertising's policies with respect to these publishers include a comprehensive list of prohibited content that ads cannot serve against. Prohibited content includes, but is not limited to, Disinformation, sensitive political content (e.g., extreme, aggressive, or misleading interpretations of news, events, or individuals), unmoderated user-generated content, and unsavory content (such as content disparaging individuals or organisations). Publishers are required to maintain a list of prohibited terms and provide us with information on their content management practices where applicable. In addition to content requirements, publishers are required to abide by restrictions against engaging in business practices that are harmful to users (e.g., distributing malware).  Microsoft Advertising reviews publisher properties and domains for policy compliance, including compliance with restrictions on prohibited content. In this review, Microsoft Advertising also considers feedback from its advertisers to help ensure a safe environment for the delivery of their advertisements, and maintains a review process to investigate related advertiser complaints. Publishers are promptly notified of properties or domains that violate Microsoft Advertising's policies; such properties and domains are not approved by Microsoft for live ad traffic. If a property or domain is already live, and later found in violation of Microsoft

Total EU Total EEA	-	-	-	-	1	1	0	-
	_	-	-	-	1	1	0	-
Member States								
	Nr of policy reviews	Nr of update to policies	Nr of accounts barred	Nr of domains barred	Nr of policy reviews	Nr of update to policies	Nr of accounts barred	Nr of domains barred
SLI 1.2.1	Methodology of data measurement  As stated in response to QRE 1.2.1, LinkedIn does not allow third parties to monetise content they post to LinkedIn by running ads against it and has not had to remove any publisher from the LinkedIn Audience Network for publishing disinformation. Accordingly, the metrics for this SLI for the period 1 - 31 December 2022 are zero.			As reported in SLI globally, not at th aggregate numbe	data measurement  1.1.1, since Micros e Member State lever of 96 domains ba	vel, we are providin	g the global t reporting period. he relevant	
	of the publishers in the LinkedIn Audience Network and filter out publisher inventory that falls short of GARM's brand safety floor.  - Third, LinkedIn regularly reviews the publishers included in the LinkedIn Audience Network to ensure they meet LinkedIn standards and are serving LinkedIn advertisers.  To date, LinkedIn has periodically removed publishers from the LinkedIn Audience Network, but has not had to remove any publisher as a result of publishing disinformation.			remedies the issue.  inkedIn and are  As stated in our newly revised policies, "We may use a combination internal signals and trusted third-party data or information source reject, block, or take down ads or sites that contain disinformation or inkedIn  traffic to pages containing disinformation."				

Measure 1.3	LinkedIn	Microsoft Advertising
QRE 1.3.1	LinkedIn provides a range of information and tools to give advertisers transparency and control regarding the placement of their advertising. For example, for ads on the LinkedIn platform, LinkedIn publishes a Feed Brand Safety score for advertisers and the public. The Feed Brand Safety score measures the number of ad impressions on the LinkedIn platform that appeared adjacent to – that is, immediately above or below within the LinkedIn feed – content removed for violating LinkedIn's Professional Community Policies, including disinformation. From October 2021 through June 2022, the Feed Brand Safety score was 99%+ safe. More information about LinkedIn's Feed Brand Safety Score is available here.  In addition, LinkedIn publishes for advertisers and the public a semi-annual transparency report, which discloses the amount of violating member content, including misinformation, that LinkedIn removed from the platform during the period. For the period from 1 January to 30 June 2022, for example, LinkedIn removed 172,387 pieces of misinformation from the platform. LinkedIn's most recent transparency report is available here.  For ads on the LinkedIn Audience Network, as discussed in QRE 1.2.1, LinkedIn provides tools to assist advertisers in controlling where their ads appear within the network. For example, advertisers can set up category-level blocking based on the Interactive Advertising Bureau's (IAB) publisher category taxonomy to prevent their ads from running on certain types of publishers within the network and create custom allow lists and block lists to ensure their ads are placed on apps and sites that meet an advertiser's specific standards.	Microsoft Advertising provides its customers with campaign reporting and functionalities to monitor and control ad placement across the Microsoft Advertising network. Such transparency controls are generally available via the campaign User Interface (UI) and through customer support. Transparency controls include:  - Ad delivery reports at the domain level: data reports show the website/domain where the ads are served.  - Site exclusions: ability to exclude certain websites/domains from the ad campaigns to prevent ads from serving on such websites.  - Negative keywords exclusions: ability to exclude certain keywords from the ad campaigns to prevent ads from serving against search queries containing such keywords.  - Syndication Publisher Network Opt-Out: ability to prevent any ad delivery on the extended publisher network. In which case, all ads will serve on owned and operated properties.

Measure 1.4	LinkedIn	Microsoft Advertising
QRE 1.4.1	This Measure is not relevant or pertinent for LinkedIn as it does not buy advertising on behalf of others, inclusive of advertisers, and agencies.	This measure is not relevant or pertinent to Microsoft Advertising as it does not buy advertising, inclusive of advertisers, and agencies.
Measure 1.5	LinkedIn	Microsoft Advertising
QRE 1.5.1	As indicated in response to QRE 1.2.1, LinkedIn does not offer a content monetisation or an ad revenue share program. Thus, no member content is monetised or demonetised, and there is no ability for a member publishing disinformation on LinkedIn to collect advertising revenue share. As a result, LinkedIn has not undertaken independent third-party audits relative to monetisation and disinformation.	Not applicable, as Microsoft Advertising does not produce first party reporting. Please see QRE 1.5.2 for the relevant actions.
QRE 1.5.2	Not applicable.	Microsoft Advertising undergoes yearly Media Rating Council (MRC) accreditations via third-party audit. The Media Rating Council (MRC) accreditation certifies Microsoft Advertising's click measurement systems adheres to the industry standards for counting ad clicks and the processes supporting this technology are accurate. Here is the Microsoft Advertising's MRC accreditation letter. This article provides a summary of the click measurement processes and methods Microsoft Advertising employs to measure and count clicks. For additional information, please visit the IAB/MRC click measurement guidelines.
		Microsoft Adverting undergoes yearly audit by the Network Advertising Initiative (NAI) as part of the annual member's compliance review process.
Measure 1.6	LinkedIn	Microsoft Advertising
QRE 1.6.1	LinkedIn has integrated a number of brand safety tools and services to help advertisers understand and control the placement of their advertising, and help avoid the placement of advertising next to disinformation content and/or in places or sources that repeatedly publish disinformation.	As described in QRE 1.2.1, Microsoft Advertising partner with Information Integrity experts, such as NewsGuard and GDI, as source and references of Disinformation domains. Microsoft Advertising is actively blocking domains that these sources deem as Disinformation. Please see QRE 1.3.1 for transparency and control functionalities.

SLI 1.6.1	Methodology of data measurement	Methodology of data measurement
QRE 1.6.4	This QRE is not relevant or pertinent as LinkedIn is not a ratings service.	This QRE is not relevant or pertinent as Microsoft Advertising is not a ratings service.
QRE 1.6.3	This QRE is not relevant or pertinent as LinkedIn is not a brand safety tool provider.	This QRE is not relevant or pertinent as Microsoft Advertising is not a brand safety tool provider.
QRE 1.6.2	This QRE is not relevant or pertinent for LinkedIn as it does not buy advertising on behalf of others, inclusive of advertisers, and agencies.	This QRE is not relevant or pertinent as Microsoft Advertising does not buy advertising.
	First, it's worth noting that LinkedIn endeavors to limit the disinformation that may appear on its platform in the first place. As set out in response to QREs 17.1.1 / 18.1.3 / 18.2.1 / 23.2.1, LinkedIn has implemented automated and manual systems and processes to detect and remove content that violates our policies, including disinformation, and to take action on violative content when it's reported to us. Further, LinkedIn limits and controls the publishers that are included in the LinkedIn Audience Network, discussed in response to QRE 1.2.1.  Second, LinkedIn has partnered with third parties, such as Integral Ad Science and DoubleVerify, to evaluate and filter advertising inventory on LinkedIn Audience Network publisher sites that falls short of standards, such as GARM's brand safety floor. These partners help evaluate and filter third-party publisher advertising inventory before a bid is placed, and decrease instances when an ad may run on an unsafe or low-quality page.  In addition, LinkedIn has implemented a Brand Safety Hub within LinkedIn Campaign Manager. As part of the hub, advertisers can control what publisher apps and sites their ads appear on within the LinkedIn Audience Network. For example, advertisers can create custom block lists and allow lists of publisher sites within the LinkedIn Audience Network that meet an advertiser's specific standards. Similarly, advertisers can apply third-party brand safety tools to their campaigns, including IAB publisher categories and DoubleVerify brand suitability profiles.	

	Not applicable	Not applicable.
	In view of steps taken to integrate brand safety tools: % of advertising/	In view of steps taken to integrate brand safety tools: % of advertising/
	media investment protected by such tools	media investment protected by such tools
Member States	n/a	n/a

	II. Scrutiny of Ad Placements						
D.L. Cinnets	Commitment 2  Relevant Signatories participating in advertising commit to prevent the misuse of advertising systems to disseminate Disinformation in the form of advertising						
Relevant Signatorie	s participating in adverti	sing commit to prevent	the misuse of adve messages.	ertising	systems to disseminate D	isinformation in the form of advertising	
	C.2	M 2.1	M 2.2		M 2.3	M 2.4	
We signed up to the following measures of this commitment:	LinkedIn Microsoft Advertising	LinkedIn Microsoft Advertising	LinkedIn Microsoft Adverti	ising	LinkedIn Microsoft Advertising	LinkedIn Microsoft Advertising	
or this communicity.	LinkedIn			Micr	osoft Advertising		
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	Yes			Yes			
If yes, list these implementation	New Implementation Me				Implementation Measures		
measures here .	As outlined below, Linked	dln:		Micro	osoft Advertising implemented	d the following measures:	

	<ul> <li>has implemented and enforces policies concerning misinformation and disinformation.</li> <li>partners with others to facilitate the flow of information to tackle purveyors of disinformation.</li> <li>has implemented systems and procedures to help ensure ads on LinkedIn comply with its Advertising Policies.</li> <li>provides information to advertisers when ads are restricted about the policies at issue.</li> </ul>	<ul> <li>Revised policies to prohibit ads or sites that contain or lead to Disinformation.</li> <li>Updated processes and mechanisms to enforce such policies.</li> <li>Integration of third-party verification systems to demonetise Disinformation across the advertising network.</li> </ul>
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	Yes	Yes
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures  LinkedIn plans to continue to assess its policies and services and to update them as warranted.	Planned Implementation Measures  Over the next reporting period, Microsoft Advertising plans to:  - Iterate on the current enforcement processes and procedures by introducing additional automation mechanisms.  - Further streamline data reporting in accordance with the Code's progress in reporting compliance efforts.

Measure 2.1	LinkedIn	Microsoft Advertising
QRE 2.1.1	As noted in response to QRE 1.1.1, LinkedIn prohibits misinformation and disinformation on its platform, whether in the form of organic content or in the form of advertising content. LinkedIn's Professional Community Policies, which apply to all content on the platform, expressly prohibit false and misleading content, including misinformation and disinformation:  - Do not share false or misleading content: Do not share content in a way that you know is, or think may be, misleading or inaccurate, including misinformation or disinformation. Do not share content to interfere with or improperly influence an election or other civic process. We may prevent you from posting content from sites that are known to produce or contain misinformation. Do not share content that directly contradicts guidance from leading global health organisations and public health authorities; including false information about the safety or efficacy of COVID-19 vaccines. Do not share false content or information, including news stories, as though they are true or likely true. Do not post "deepfake" images or videos of others or otherwise post content that has been manipulated to deceive. Do not share content or endorse someone or something in exchange for personal benefit (including personal or family relationships, monetary payment, free products or services, or other value), unless you have included a clear and conspicuous notice of the personal benefit you receive and have otherwise complied with our Advertising Policies.  LinkedIn provides additional specific examples of false and misleading content that violates its policy via a Help Center article on False or Misleading Content.	In December 2022, Microsoft Advertising rolled out revised network-wide policies to avoid the publishing and carriage of harmful Disinformation and the placement of advertising next to Disinformation content. Such policies prohibit ads or sites that contain or lead to Disinformation. To enforce this policy, "We may use a combination of internal signals and trusted third-party data or information sources to reject, block, or take down ads or sites that contain disinformation or send traffic to pages containing disinformation. We may block at the domain level landing pages or sites that violate this policy."  Please see <a href="here">here</a> for our main policy page.

	LinkedIn's Advertising Policies incorporate the above provision, and similarly prohibit misinformation and disinformation. In addition, LinkedIn's Advertising Policies separately prohibit fraudulent and deceptive ads, and require that claims in an ad have factual support:  - Fraud and Deception: Ads must not be fraudulent or deceptive. Your product or service must accurately match the content of your ad. Any claims in your ad must have factual support. Do not make deceptive or inaccurate claims about competitive products or services. Do not imply you or your product are affiliated with or endorsed by others without their permission. Do not advertise prices or offers that are inaccurate - any advertised discount, offer or price must be easily discoverable from the link in your ad.			
	Methodology of data measurement	Methodology of data	measurement	
SLI 2.1.1 – Numbers by actions enforcing policies above	The table below reports the number of ads LinkedIn restricted under the misinformation policies in QRE 2.1.1 above between 1 – 31 December 2022, broken out by EU Member State.  The metrics are assigned to EU Member State based on the primary country targeting of the ad.  In total, 19 ads were restricted between 1 – 31 December 2022.	"Blocked Impressions would have generate "Unique Domains" me	d if not blocked. eans the URLs associated is 19 December 2022 to	impressions that the Unique Ads to the Unique Ads. 16 January 2023.
	The number of ads LinkedIn restricted under the misinformation policies in QRE 2.1.1 between 1 - 31 December 2022	Unique Ads	Blocked Impressions	Unique Domains
Member States				
Austria	0	79	333	2
Belgium	0	44	1.033	4
Bulgaria	0	29	61	1

Cyprus	0	10	10	1
Czech Republic	0	13	13	2
Denmark	0	72	120	2
Estonia	0	3	3	1
Finland	0	19	49	2
France	6	464	366,048	4
Germany	3	2,450	28,186	4
Greece	0	16	30	2
Hungary	0	22	22	2
Ireland	0	1,968	12,170	2
Italy	2	205	1,667	3
Latvia	0	1	2	1
Lithuania	0	7	7	1
Luxembourg	0	0	0	0
Malta	0	1	1	1
Netherlands	0	346	1,094	5
Poland	3	85	128	3
Portugal	0	34	39	1
Romania	0	61	69	2
Slovakia	0	6	6	2
Slovenia	0	3	5	1
Spain	4	1,838	35,899	3
Sweden	1	87	220	3
Iceland	-	1	1	1
Liechtenstein	-	0	0	0
Norway	-	37	60	2
Total EU	19	7,859	447,215	58
Total EEA	-	7,897	447,276	61

Measure 2.2	LinkedIn	Microsoft Advertising
QRE 2.2.1	LinkedIn works with numerous partners to facilitate the flow of information to tackle purveyors of disinformation, including disinformation spread by state-sponsored and institutional actors.  LinkedIn maintains an internal Threat Prevention and Defense team composed of threat investigators and intelligence personnel to address disinformation. This team works with various other internal teams, including our Artificial Intelligence modeling team, to develop leads into threat actor campaigns. The leads are then manually verified, and confirmed TTPs (Tactics, Techniques, and Procedures) and IOCs (Indicators of Compromise) relating to threat actors are shared with other external stakeholders, including, for example, industry peers. Any associated disinformation content is verified by our internal or external fact-checkers, and coordinated inauthentic behaviours (CIBs) are also removed by our Threat Prevention and Defense team.  LinkedIn, along with its parent company, Microsoft, is heavily involved in threat exchanges. These threat exchanges take various forms, such as:  1) regular discussion amongst industry peers to discuss high-level trends and campaigns; and, 2) one-on-one engagement with individual peer companies to discuss TTPs and IOCs. This exchange of information leads to a better understanding of the incentives of sophisticated and well-funded threat actors and how they evolve their TTPs to achieve those goals, which assists us in their identification and removal.  LinkedIn always stands ready to receive and investigate any leads we receive from peers and other external stakeholders. In addition to one-	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 techniques, automated screening, the expertise of its operations team, and dedicated user safety experts. In addition, Microsoft Advertising conducts a manual review of all advertisements flagged to its customer support team and removes advertisements that violate its policies.  As stated in our newly revised policies on Disinformation, "We may use a combination of internal signals and trusted third-party data or information sources to reject, block, or take down ads or sites that contain disinformation or send traffic to pages containing disinformation." Microsoft Advertising partner with Information Integrity experts, such as NewsGuard and GDI, as source and references of Disinformation domains. Microsoft Advertising is actively blocking domains that these sources deem as spreading Disinformation.  In addition to the newly rollout policy on Disinformation, Microsoft Advertising's Misleading Content Policies prohibit advertising content that is misleading, deceptive, fraudulent, or that can be harmful to its users, including advertisements that contain unsubstantiated claims, or that falsely claim or imply endorsements or affiliations with third party products, services, governmental entities, or organisations. Microsoft Advertising also has a set of Relevance and Quality Policies to manage the relevancy and quality of the advertisements that it serves through its advertising network. These policies
	on-one engagement with peers, we also consume intelligence from vendors and investigate any TTPs and IOCs made available in peer disclosures. In turn, we also regularly release information about	deter advertisers from luring users onto sites using questionable or misleading tactics (e.g., by prohibiting advertisements that lead users to sites that misrepresent the origin or intent of their content).

	disinformation on our platform in publicly-available transparency reports and blog posts.	
Measure 2.3	LinkedIn	Microsoft Advertising
QRE 2.3.1	All advertising that runs on LinkedIn's platform is subject to LinkedIn's Advertising Policies. LinkedIn has implemented both automated and manual systems to help ensure that advertising on the platform complies with its Advertising Policies, and that ads that do not comply with its policies are removed.  When an advertiser submits an advertising campaign, the campaign is evaluated by LinkedIn automated systems. If those systems determine a campaign may violate LinkedIn's policies, the campaign is forwarded to LinkedIn's advertising review team for manual review.  The advertising review team is trained in LinkedIn's Advertising Policies and dedicated to advertising review. LinkedIn also employs a dedicated team of trainers, who not only support the onboarding of new ad reviewers, but also provide ongoing educational opportunities for reviewers.  LinkedIn similarly employs quality assurance analysts, who provide one-on-one coaching, as well as regular monthly forums to discuss reviewers' most frequent challenges. For complex issues, reviewers have direct access to global advertising policy managers through regular office hours and dedicated escalation pathways.  LinkedIn members may also report ads that they believe violate LinkedIn's advertising policies, and when members report ads LinkedIn's advertising review team reviews them. To report an ad, members can click on the three-dot icon in the upper right-hand corner of every ad and select the "Hide or report this ad" option. Members are then	Please see QRE 2.2.1. Microsoft Advertising blocks sites or domains that our Information Integrity expert partners deem as spreading Disinformation.  Microsoft Advertising also rejects all ads associated to such domains and instructs its publishing partners to block ads from showing on such domains. We did not receive any request to remove content during the reporting period, which may be due to the proactive nature of our actions.

	directed to select a reporting reason,	with "Misinformation" provided as		
	a reporting option.			
	Methodology of data measurement		Methodology of data measurement	
	under the misinformation policies in QRE 2.1.1. The metrics include: (1) the number of ads LinkedIn restricted under the misinformation policies		Please see SLI 2.1.1 (Unique Ads) for the number of ads prohibited.	
	were restricted. The metrics are assign	•	The reporting period is 19 December	<sup>-</sup> 2022 to 16 January 2023.
SLI 2.3.1	on the primary country targeting of t	he ad.		
	In total, 19 ads were restricted between 1 - 31 December 2022. The ads did not receive any impressions before they were restricted.  The number of ads LinkedIn restricted under the misinformation ads received before they were		Nr of ads removed (as well as reach of ads before they were	Nr of ads prohibited
	policies in QRE 2.1.1 between 1 - 31 December 2022	restricted	successfully removed)	
Member States	31 December 2022			
Austria	0	0	0	79
Belgium	0	0	0	44
Bulgaria	0	0	0	29
Croatia	0	0	0	0
Cyprus	0	0	0	10
Czech Republic	0	0	0	13
Denmark	0	0	0	72
Estonia	0	0	0	3
Finland	0	0	0	19
France	6	0	0	464

Germany	3	0	0	2,450
Greece	0	0	0	16
Hungary	0	0	0	22
Ireland	0	0	0	1,968
Italy	2	0	0	205
Latvia	0	0	0	1
Lithuania	0	0	0	7
Luxembourg	0	0	0	0
Malta	0	0	0	1
Netherlands	0	0	0	346
Poland	3	0	0	85
Portugal	0	0	0	34
Romania	0	0	0	61
Slovakia	0	0	0	6
Slovenia	0	0	0	3
Spain	4	0	0	1,838
Sweden	1	0	0	87
Iceland	-	-	0	1
Liechtenstein	-	-	0	0
Norway	-	-	0	37
Total EU	19	0	0	7,859
Total EEA	-	-	0	7,897
Measure 2.4	LinkedIn		Microsoft Advertising	
QRE 2.4.1	described in QRE 2.3.1, LinkedIn sends the advertiser an email notification. The email notification outlines the rejection reason and advertising policy that the ad has violated.		Microsoft Advertising notifies its advertisers customers of policy violations through the following:  - Prompts in the campaign User Interface (UI)  - Email notifications (for example, for account suspension)  - Notifications from the assigned Account representatives, as applicable	
	The notification also provides advertisers instructions regarding how they can address the violation, including by revising the ad in LinkedIn		Advertisers may appeal an editorial decision through the conflict-resolution process described here: How do I challenge a disapproval? (microsoft.com)	

	Campaign Manager to address the violations, or by contacting their sales representative or LinkedIn customer support if they require clarification or believe there has been a mistake.  Because advertisers can address rejections a number of ways – by revising and resubmitting the advertisement, by creating a new advertisement that complies with LinkedIn's policies, or by contacting their LinkedIn sales representative or customer support – LinkedIn does not report "appeal" and "appeal grant" metrics for ad rejections. LinkedIn has provided metrics on the number of ad restrictions as part of SLI 2.3.1 above.			
	Methodology of data measurement		Methodology of data measurement	
SLI 2.4.1	LinkedIn does not report "appeal" and "appeal grant" metrics for ad rejections as outlined in our response to QRE 2.4.1. LinkedIn has provided metrics on the number of ad restrictions as part of SLI 2.3.1 above.		Microsoft Advertising tracks appeals in the aggregate and not at the Member State level due to the nature of its services. We are providing the aggregate global value of 4,105 total appeals during the relevant reporting period. Microsoft Advertising did not overturn any such appeals.  The reporting period is 19 December 2022 to 16 January 2023.	
	Nr of appeals	Proportion of appeals that led to	Nr of appeals	Proportion of appeals that led to a
	141 Of appeals	a change of the initial decision	THE OF APPEALS	change of the initial decision
Member States				
List actions per member states	N/A		4,105	None overturned.

#### **II. Scrutiny of Ad Placements**

#### Commitment 3

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

	C.3	M 3.1	M 3.2	M 3.3
We signed up to the	LinkedIn	LinkedIn	LinkedIn	LinkedIn
following measures of this commitment:	Microsoft Advertising	Microsoft Advertising	Microsoft Advertising	Microsoft Advertising
	LinkedIn		Microsoft Advertising	
In line with this	Yes		No	
commitment, did you				
deploy new				
implementation				
measures (e.g. changes				
to your terms of				
service, new tools, new				
policies, etc)? [Yes/No]				
If yes, list these	New Implementation Measures		New Implementation Measures	
implementation				
measures here .	measures here . As outlined under Measure 3.1, LinkedIn: - partners with others to facilitate the flow of information to		Not applicable	
	tackle purveyors of di	isinformation.		
	- exchanges information	on with industry partners regarding		
	disinformation trends	and TTPs.		
Do you plan to put	No		No	
further implementation				
measures in place in				

the next 6 months to		
substantially improve		
the maturity of the		
implementation of this		
commitment? [Yes/No]		
If yes, which further	Planned Implementation Measures	Planned Implementation Measures
implementation		
measures do you plan	Not applicable	Not applicable
to put in place in the		
next 6 months?		
Measure 3.1	LinkedIn	Microsoft Advertising
QRE 3.1.1	As discussed as part of QRE 2.2.1, LinkedIn works with numerous partners to facilitate the flow of information to tackle purveyors of disinformation, including disinformation spread by state-sponsored and institutional actors.  LinkedIn maintains an internal Threat Prevention and Defense team composed of threat investigators and intelligence personnel to address disinformation. This team works with various other internal teams, including our Artificial Intelligence modeling team, to develop leads into threat actor campaigns. The leads are then manually verified, and confirmed TTPs (Tactics, Techniques, and Procedures) and IOCs (Indicators of Compromise) relating to threat actors are shared with other external stakeholders, including, for example, industry peers. Any associated disinformation content is verified by our internal or external fact-checkers, and coordinated inauthentic behaviours (CIBs) are also removed by our Threat Prevention and Defense team.  LinkedIn, along with its parent company, Microsoft, is heavily involved in threat exchanges. These threat exchanges take various forms, such as: 1) regular discussion amongst industry peers to discuss high-level trends and campaigns; and, 2) one-on-one engagement with	Microsoft Advertising partners with Information Integrity experts, such as NewsGuard and GDI, as source and references of Disinformation domains. Microsoft Advertising is a member and an active participant in several trade groups, including the IAB and EDAA.  As part of the broader Microsoft engagements, Microsoft Advertising participates in threat exchange discussions with industry peers and trusted third parties which increase the effectiveness of our enforcement actions.

	individual peer companies to discuss TTPs and IOCs. This exchange of information leads to a better understanding of the incentives of sophisticated and well-funded threat actors and how they evolve their TTPs to achieve those goals, which assists us in their identification and removal.  LinkedIn always stands ready to receive and investigate any leads we receive from peers and other external stakeholders. In addition to one-on-one engagement with peers, we also consume intelligence from vendors and investigate any TTPs and IOCs made available in peer disclosures. In turn, we also regularly release information about disinformation on our platform in publicly-available transparency reports and blog posts.	
Measure 3.2		Microsoft Advertising
QRE 3.2.1	Please see the response to QRE 3.1.1. In addition, LinkedIn is a member of and participates in GARM.	Please see the response to QRE 3.1.1.
Measure 3.3	LinkedIn	Microsoft Advertising
QRE 3.3.1	Please see the response to QRE 3.1.1. In addition, as discussed in response to QRE 1.6.1, LinkedIn partners with companies including Integral Ad Science and DoubleVerify to help evaluate and filter advertising inventory on LinkedIn Audience Network publisher sites that falls short of GARM's brand safety floor.	Please see the response to QRE 3.1.1.

# III. Political Advertising Commitments 4 - 13

		III. Political Adver	tising					
	Commitment 4							
	Relevant Signatories commit to adopt a common definition of "political and issue advertising".							
N	C.4	M 4.1		M 4.2				
We signed up to the following measures of this commitment:	LinkedIn  Microsoft Advertising	LinkedIn  Microsoft Advertising		LinkedIn  Microsoft Advertising				
	LinkedIn		Microsoft Advertis	ing				
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No] If yes, list these implementation measures here.	New Implementation Measures  Not applicable.		New Implementation  Not applicable.	n Measures				
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	Yes		Yes					

If yes, which further	Planned Implementation Measures	Planned Implementation Measures
implementation		
measures do you plan	Pending a political agreement on the Regulation on Transparency	Pending a political agreement on the Regulation on Transparency and
to put in place in the	and Targeting of Political Advertising, LinkedIn, as part of Microsoft,	Targeting of Political Advertising, Microsoft Advertising, as part of Microsoft,
next 6 months?	will contribute to discussions on the definition of political advertising	will contribute to discussions on the definition of political advertising in the
	in the Task-force Working Group on Political Advertising once it will	Task-force Working Group on Political Advertising once it will be
	be established.	established.
Measure 4.1	LinkedIn	Microsoft Advertising
Measure 4.2	LinkedIn	Microsoft Advertising
QRE 4.1.1 (for	LinkedIn's Advertising Policies do not allow political advertising, and	Microsoft Advertising policies prohibit ads for election-related content,
measures 4.1 and 4.2)	LinkedIn has not allowed political advertising since 2018.	political candidates, parties, ballot measures and political fundraising
		globally; similarly, ads aimed at fundraising for political candidates, parties,
	Among other things, LinkedIn Advertising policies prohibit "ads	political action committees ("PACs"), and ballot measures also are barred. All
	advocating for or against a particular candidate, party, or ballot	Microsoft and third-party services that rely on Microsoft Advertising to serve
	proposition or otherwise intended to influence an election outcome"	advertisements on their platforms benefit from these robust, and robustly
	and "ads fundraising for or by political candidates, parties, political	enforced, set of policies. Furthermore, Microsoft prohibits political
	action committees or similar organisations, or ballot propositions." In	advertising across Microsoft media properties and platforms. Microsoft
	addition, LinkedIn's Advertising Policies prohibit certain types of	Advertising's policies also prohibit certain types of advertisements that
	advertisements that might be considered issue based. For example,	might be considered issue-based. More specifically, "advertising that
	"ads exploiting a sensitive political issue even if the advertiser has no	exploits political agendas, sensitive political issues or uses 'hot button'
	explicit political agenda" are also prohibited.	political issues or names of prominent politicians is not allowed regardless
		of whether the advertiser has a political agenda," and "advertising that
		exploits sensitive political or religious issues for commercial gain, or
		promote extreme political or extreme religious agendas or any known
		associations with hate, criminal or terrorist activities" is also prohibited.
		See here: Political content - Microsoft Advertising

QRE 4.1.2 (for	This QRE is not relevant for this Baseline report as it will only become	This QRE is not relevant for this Baseline report as it will only become
measures 4.1 and 4.2)	applicable as of June 2023.	applicable as of June 2023.

# Commitment 5

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

	C.5	M 5.1			
We signed up to the	LinkedIn	LinkedIn			
following measures of this commitment:	Microsoft Advertising	Microsoft Advertising			
	LinkedIn		Microsoft Advertising		
In line with this	No		No		
commitment, did you					
deploy new					
implementation					
measures (e.g. changes					
to your terms of					
service, new tools, new					
policies, etc)? [Yes/No]					
If yes, list these	New Implementation Measures		New Implementation Measures		
implementation					
measures here .	The current implementation mea	asures employed by LinkedIn suffice	The current implementation measures employed by Microsoft Advertising		
	to meet this commitment.		suffice to meet this commitment.		

Do you plan to put	No	No
further implementation		
measures in place in		
the next 6 months to		
substantially improve		
the maturity of the		
implementation of this		
commitment? [Yes/No]		
If yes, which further	Planned Implementation Measures	Planned Implementation Measures
implementation		
measures do you plan	Not applicable as LinkedIn currently prohibits all political advertising,	Not applicable as Microsoft Advertising currently <u>prohibits</u> all political
to put in place in the	as outlined under QRE 5.1.1.	advertising, as outlined under QRE 5.1.1.
next 6 months?		
Measure 5.1	LinkedIn	Microsoft Advertising
ivieasure 5.1		g
QRE 5.1.1	LinkedIn's Advertising Policies do not allow political advertising, and	Microsoft Advertising policies prohibit ads for election-related content,
	LinkedIn has not allowed political advertising since 2018.	political candidates, parties, ballot measures and political fundraising
	Linkedin has not anowed pointed davertising since 2010.	political carididates, parties, ballot measures and political fundraising [
	Ellikean has not allowed pointed davertising since 2010.	globally; similarly, ads aimed at fundraising for political candidates, parties,
	Among other things, LinkedIn Advertising policies prohibit "ads	
	, , , , , , , , , , , , , , , , , , ,	globally; similarly, ads aimed at fundraising for political candidates, parties,
	Among other things, LinkedIn Advertising policies prohibit "ads	globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All
	Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot	globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve
	Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome"	globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve advertisements on their platforms benefit from these robust, and robustly
	Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome" and "ads fundraising for or by political candidates, parties, political	globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve advertisements on their platforms benefit from these robust, and robustly enforced, set of policies. Furthermore, Microsoft prohibits political
	Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome" and "ads fundraising for or by political candidates, parties, political action committees or similar organisations, or ballot propositions." In	globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve advertisements on their platforms benefit from these robust, and robustly enforced, set of policies. Furthermore, Microsoft prohibits political advertising across Microsoft media properties and platforms. Microsoft
	Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome" and "ads fundraising for or by political candidates, parties, political action committees or similar organisations, or ballot propositions." In addition, LinkedIn's Advertising Policies prohibit certain types of	globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve advertisements on their platforms benefit from these robust, and robustly enforced, set of policies. Furthermore, Microsoft prohibits political advertising across Microsoft media properties and platforms. Microsoft Advertising's policies also prohibit certain types of advertisements that
	Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome" and "ads fundraising for or by political candidates, parties, political action committees or similar organisations, or ballot propositions." In addition, LinkedIn's Advertising Policies prohibit certain types of advertisements that might be considered issue based. For example,	globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve advertisements on their platforms benefit from these robust, and robustly enforced, set of policies. Furthermore, Microsoft prohibits political advertising across Microsoft media properties and platforms. Microsoft Advertising's policies also prohibit certain types of advertisements that might be considered issue-based. More specifically, "advertising that
	Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome" and "ads fundraising for or by political candidates, parties, political action committees or similar organisations, or ballot propositions." In addition, LinkedIn's Advertising Policies prohibit certain types of advertisements that might be considered issue based. For example, "ads exploiting a sensitive political issue even if the advertiser has no	globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve advertisements on their platforms benefit from these robust, and robustly enforced, set of policies. Furthermore, Microsoft prohibits political advertising across Microsoft media properties and platforms. Microsoft Advertising's policies also prohibit certain types of advertisements that might be considered issue-based. More specifically, "advertising that exploits political agendas, sensitive political issues or uses 'hot button'
	Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome" and "ads fundraising for or by political candidates, parties, political action committees or similar organisations, or ballot propositions." In addition, LinkedIn's Advertising Policies prohibit certain types of advertisements that might be considered issue based. For example, "ads exploiting a sensitive political issue even if the advertiser has no	globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve advertisements on their platforms benefit from these robust, and robustly enforced, set of policies. Furthermore, Microsoft prohibits political advertising across Microsoft media properties and platforms. Microsoft Advertising's policies also prohibit certain types of advertisements that might be considered issue-based. More specifically, "advertising that exploits political agendas, sensitive political issues or uses 'hot button' political issues or names of prominent politicians is not allowed regardless
	Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome" and "ads fundraising for or by political candidates, parties, political action committees or similar organisations, or ballot propositions." In addition, LinkedIn's Advertising Policies prohibit certain types of advertisements that might be considered issue based. For example, "ads exploiting a sensitive political issue even if the advertiser has no	globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve advertisements on their platforms benefit from these robust, and robustly enforced, set of policies. Furthermore, Microsoft prohibits political advertising across Microsoft media properties and platforms. Microsoft Advertising's policies also prohibit certain types of advertisements that might be considered issue-based. More specifically, "advertising that exploits political agendas, sensitive political issues or uses 'hot button' political issues or names of prominent politicians is not allowed regardless of whether the advertiser has a political agenda," and "advertising that
	Among other things, LinkedIn Advertising policies prohibit "ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome" and "ads fundraising for or by political candidates, parties, political action committees or similar organisations, or ballot propositions." In addition, LinkedIn's Advertising Policies prohibit certain types of advertisements that might be considered issue based. For example, "ads exploiting a sensitive political issue even if the advertiser has no	globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot measures also are barred. All Microsoft and third-party services that rely on Microsoft Advertising to serve advertisements on their platforms benefit from these robust, and robustly enforced, set of policies. Furthermore, Microsoft prohibits political advertising across Microsoft media properties and platforms. Microsoft Advertising's policies also prohibit certain types of advertisements that might be considered issue-based. More specifically, "advertising that exploits political agendas, sensitive political issues or uses 'hot button' political issues or names of prominent politicians is not allowed regardless of whether the advertiser has a political agenda," and "advertising that exploits sensitive political or religious issues for commercial gain, or

#### Commitment 6

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

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

#### **III. Political Advertising**

#### Commitment 7

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

	C.7	M 7.1	M 7.2		M 7.3	M 7.4
We signed up to the	LinkedIn	n/a	n/a		LinkedIn	n/a
following measures of this commitment:	Microsoft Advertising				Microsoft Advertising	
	LinkedIn	Microsoft Advertising				
In line with this	No			No		

commitment, did you

deploy new		
implementation		
measures (e.g. changes		
to your terms of		
service, new tools, new		
policies, etc)? [Yes/No]		
If yes, list these	New Implementation Measures	New Implementation Measures
implementation		
measures here .	Not applicable	Not applicable
Do you plan to put	No	No
further implementation		
measures in place in		
the next 6 months to		
substantially improve		
the maturity of the		
implementation of this		
commitment? [Yes/No]		
If yes, which further	Planned Implementation Measures	Planned Implementation Measures
implementation		
measures do you plan	Not applicable	Not applicable
to put in place in the		
next 6 months?		
Measure 7.3	LinkedIn	Microsoft Advertising
ODE 7.2.1	As set out in ODE F.1.1 Linkedly's Advertising Delinies muchibit	As set out in ORE E.1. Microsoft Advertising prohibite and for election
QRE 7.3.1	As set out in QRE 5.1.1, LinkedIn's Advertising Policies prohibit	As set out in QRE 5.1.1, Microsoft Advertising prohibits ads for election-
	political advertising. Before submitting a campaign, customers must	related content, political candidates, parties, ballot measures and political
	agree that their ad complies with LinkedIn's policies.	fundraising globally; similarly, ads aimed at fundraising for political candidates, parties, political action committees ("PACs"), and ballot
	As detailed in QRE 2.3.1, LinkedIn has implemented both automated	measures also are barred. All Microsoft and third-party services that rely on
	and manual systems to help ensure that advertising on the platform	Microsoft Advertising to serve advertisements on their platforms benefit
	complies with its Advertising Policies, and that ads that do not comply	from these robust, and robustly enforced, set of policies.
	Complies with its Advertising Policies, and that ads that do not comply	from these robust, and robustly emorced, set of policies.

with its policies are removed. These enforcement systems apply equally to prohibited political advertising, as well as other violations Microsoft Advertising's policies also prohibit certain types of advertisements of LinkedIn's Advertising Policies. that might be considered issue-based. More specifically, "advertising that exploits political agendas, sensitive political issues or uses 'hot button' In addition to LinkedIn's preemptive enforcement, LinkedIn members political issues or names of prominent politicians is not allowed regardless may also report ads that they believe violate LinkedIn's advertising of whether the advertiser has a political agenda," and "advertising that policies, and when members report ads LinkedIn's advertising review exploits sensitive political or religious issues for commercial gain, or team reviews them. To report an ad, members can click on the threepromote extreme political or extreme religious agendas or any known dot icon in the upper right-hand corner of every ad and select the associations with hate, criminal or terrorist activities" is also prohibited. In "Hide or report this ad" option. addition, to comply with local laws in Canada and France, Microsoft Advertising has prohibited advertising content related to debates of general interest linked to an electoral campaign in those jurisdictions. See here: Political content - Microsoft Advertising **QRE 7.3.2** As set out in QRE 5.1.1, LinkedIn's Advertising Policies prohibit Microsoft Advertising employs dedicated operational support and engineering resources to enforce restrictions on political advertising using a political advertising. Ads that do not comply with LinkedIn's Advertising Policies are removed. combination of proactive and reactive mechanisms. On the proactive side, Microsoft Advertising has implemented several processes designed to block political ads from showing across its advertising network, including restrictions on certain terms and from certain domains. On the reactive side, if Microsoft Advertising becomes aware that an ad suspected of violating its policies is being served to our publishers—for instance, because someone has flagged that ad to our customer support team—the offending ad is promptly reviewed and, if it violates our policies, taken down. Users can report advertising which may be in violation of the Microsoft Advertising policies through the publisher-specific reporting form or via this form: Low quality ad submission & escalation - Microsoft Advertising

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

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

#### Commitment 10

Relevant Signatories commit to maintain repositories of political or issue advertising and ensure their currentness, completeness, usability and quality, such that they contain all political and issue advertising served, along with the necessary information to comply with their legal obligations and with transparency commitments under this Code.

	C.10	M 10.1	M 10.2
We signed up to the	Commitment 10 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow political or	n/a	n/a
following measures of	issue-based advertising as set out in more detail under measure 5.1.		
this commitment:			

## **III. Political Advertising**

#### Commitment 11

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

	C.11	M 11.1	M 11.2	M 11.3	M 11.4
We signed up to the	Commitment 11 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not	n/a	n/a	n/a	n/a
following measures of	allow political or issue-based advertising as set out in more detail under measure 5.1.				
this commitment:					

## Commitment 12

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

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

## **III. Political Advertising**

## Commitment 13

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

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

# IV. Integrity of Services Commitments 14 - 16

## **IV. Integrity of Services**

#### Commitment 14

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

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

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

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

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

C 14	M 14.1	M 14.2	M 14.3
C.14	IVI 1-7.1	IVI 17,2	141 14.5

We signed up to the	LinkedIn	LinkedIn	LinkedIn	LinkedIn
following measures of this	Bing Search	Bing Search	Bing Search	Bing Search
commitment:				
	LinkedIn		Bing Search	
In line with this	No		No	
commitment, did you				
deploy new				
implementation				
measures (e.g. changes				
to your terms of service,				
new tools, new policies,				
etc)? [Yes/No]				
If yes, list these	New Implementation Measures		New Implementation Measu	ires
implementation				
measures here .	Not applicable		Not applicable	
Do you plan to put	No		No	
further implementation				
measures in place in the				
next 6 months to				
substantially improve the				
maturity of the				
implementation of this				
commitment? [Yes/No]				
If yes, which further	Planned Implementation Measures		Planned Implementation Me	easures
implementation				
measures do you plan to	Not applicable		Bing's existing programs are	already designed to address these
put in place in the next 6			issues, but, of course, Bing re	egularly evaluates the efficacy of its
months?			measures and endeavors to	improve and work to respond quickly
			to new threats or issues as the	hey arise.

Measure 14.1	LinkedIn	Bing Search
QRE 14.1.1	LinkedIn's <u>User Agreement</u> (in particular section 8 <i>LinkedIn "Dos and Don'ts"</i> ) and our <u>Professional Community Policies</u> which are accepted by every member when signing up to LinkedIn's servicedetail the impermissible manipulative behaviours and practices that are prohibited on our platform. Fake accounts, misinformation, and inauthentic content are not allowed, and we take active steps to remove it from our platform.  LinkedIn provides additional specific examples of false and misleading content that violates its policy via a Help Center article on <u>False or Misleading Content</u> .	index of websites available on the internet. Bing does not host the content or control the operation, content, or design of the indexed websites. Users come to Bing with a specific research topic in mind and expect Bing to provide links to the most relevant and authoritative third-party websites on the Internet that are responsive to their search terms. Bing Search does not have a news feed for users, allow users to post and share content, or otherwise enable
		Therefore, addressing misinformation in organic search results often requires a different approach than may be appropriate for other types of online services. Many of the TTPs are more pertinent to social media (e.g., those relating to user accounts, subscribers/followers, influencers, or targeting users of a service) and do not apply to search engines. Instead, Bing's policies primarily address TTP Number 10, which concerns the use of deceptive practices to attempt to deceive or manipulate search ranking algorithms, such as by exploiting data voids, spam tactics, or keyword stuffing.
		Bing Search's primary mechanism for combatting misinformation in search is via ranking improvements that take into account the quality and credibility (QC) of a website, working to rank higher quality and more authoritative pages over lower authority content. Bing Search's ranking policies, including how QC is determined, are described in the How Bing Ranks Your Content section of the <a href="Bing Webmaster Guidelines">Bing Webmaster Guidelines</a> .
		Bing's general spam policies prohibit certain practices intended to manipulate or deceive the Bing search algorithms, including the TTPs

employed by malicious actors in the spread of disinformation, in the "Abuse and Examples of Things to Avoid" section of the Bing

Webmaster Guidelines. Pursuant to the Webmaster Guidelines, Bing may take action on websites employing spam tactics or that otherwise violate the Webmaster Guidelines, including by applying ranking penalties (such as demoting a website) or delisting a website from the index. However, it is important to clarify that in search it is not feasible to distinguish between spam tactics employed by malicious actors specifically for the purpose of spreading disinformation and other types of spam. Therefore, Bing Search has not presented data on the amount of spam detected and actioned pursuant to its policies since these figures are indicative of actions taken toward spam overall and presently cannot be used to provide an accurate assessment of whether it pertains to spam used in connection with misinformation campaigns.

#### See also QRE 14.1.2.

**QRE 14.1.2** 

to tackle purveyors of disinformation, including disinformation spread by or falsity of the content can raise significant concerns relating to state-sponsored and institutional actors.

composed of threat investigators and intelligence personnel to address trusted, authoritative news and information appears first and disinformation. This team works with various other internal teams, providing tools to help its users evaluate the trustworthiness of including our Artificial Intelligence modeling team, to develop leads into threat actor campaigns. The leads are then manually verified, and that appears in search results. confirmed TTPs (Tactics, Techniques, and Procedures) and IOCs (Indicators of Compromise) relating to threat actors are shared with other external During the reporting period, Bing has taken actions to promote high stakeholders, including, for example, industry peers. Any associated authority, high quality content and thereby reduce the impact of disinformation content is verified by our internal or external fact-checkers, disinformation appearing in Bing search results. This includes Bing's and coordinated inauthentic behaviours (CIBs) are also removed by our continued improvement of its ranking algorithms to ensure that the Threat Prevention and Defense team.

LinkedIn works with numerous partners to facilitate the flow of information | Blocking content in organic search results based solely on the truth fundamental rights of freedom of expression and the freedom to receive and impart information. Instead of blocking access to content, LinkedIn maintains an internal Threat Prevention and Defense team Bing Search focuses on ranking its organic search results so that certain sites and ensure they are not misled or harmed by the content

most authoritative, relevant content is returned at the top of search

LinkedIn, along with its parent company, Microsoft, is heavily involved in intelligence, partnership with fact-checking and media literacy threat exchanges. These threat exchanges take various forms, such as: 1) organisations, contributing to and supporting the research regular discussion amongst industry peers to discuss high-level trends and community, and implementation and enforcement of clear policies campaigns; and, 2) one-on-one engagement with individual peer concerning the use of manipulative tactics on Bing Search, among companies to discuss TTPs and IOCs. This exchange of information leads to other initiatives described in this report. a better understanding of the incentives of sophisticated and well-funded threat actors and how they evolve their TTPs to achieve those goals, which Although the Bing search algorithms endeavor to prioritise relevance, assists us in their identification and removal.

LinkedIn always stands ready to receive and investigate any leads we happens, Bing employs "defensive search" strategies and receive from peers and other external stakeholders. In addition to one-on-interventions to counteract threats and TTPs in accordance with its one engagement with peers, we also consume intelligence from vendors trustworthy search principles to help protect Bing users (1) from and investigate any TTPs and IOCs made available in peer disclosures. In being misled by untrustworthy search results and/or (2) inadvertently turn, we also regularly release information about disinformation on our platform in publicly available transparency reports and blog posts, search interventions may include algorithmic interventions (such as including for example How We're Protecting Members From Fake Profiles, Automated Fake Account Detection, and An Update on How We Keep Members Safe. The LinkedIn Community Report also describes actions we problematic queries, and manual interventions for individual take on content that violates our Professional Community Policies and User reported issues or broader areas more prone to misinformation or Agreement. It is published twice per year and covers the global detection disinformation (e.g., elections, pharmaceutical drugs, or COVID-19). of fake accounts, spam and scams, content violations and copyright infringements. The most recent reporting period covered 1 January to 30 In addition to defensive search, Bing regularly monitors for violations June 2022.

results, regular review and actioning of disinformation threat

quality, and credibility in all scenarios, in some cases Bing identifies a threat that undermines the efficacy of its algorithms. When this being exposed to unexpected harmful or offensive content. Defensive quality and credibility boosts or demotions of a website), restricting autosuggest or related search terms to avoid directing users to

of its Webmaster Guidelines, including attempts to manipulate the Bing search algorithms through prohibited practices such as cloaking, link spamming, keyword stuffing, and phishing. Bing dedicates meaningful resources to maintaining the integrity of the platform, promoting high authority, relevant results, and reducing spam (including spam aimed at distributing low authority information and manipulative content. Bing utilises a combination of human intervention and Al-driven analysis to regularly review, detect, and address spam tactics occurring on Bing Search. When Bing detects

Measure 14.2	LinkedIn	websites deploying manipulative techniques or engaging in spam tactics, those websites may incur ranking penalties or be removed from the Bing search index altogether.  See also QRE 14.1.1.  Bing Search
QRE 14.2.1	LinkedIn's Professional Community Policies prohibit misinformation, and misinformation is removed from the LinkedIn platform.  Members that post misinformation are notified of LinkedIn's removal of their content. Members that repeatedly post misinformation are permanently restricted.  State-sponsored attempts to post misinformation, if any, are removed.  Further, LinkedIn's professional focus shapes the type of content we see on platform. People tend to say things differently when their colleagues and employer are watching. Accordingly, our members don't tend to use LinkedIn to engage in the mass dissemination of misinformation, and bad actors generally need to create fake accounts to peddle misinformation.  To ensure their content reaches a large audience, bad actors need to either connect with real members or post content that real members will like—both of which are hard to achieve on LinkedIn given our professional focus. The mass dissemination of false information, as well as artificial traffic and engagement, therefore, requires the mass creation of fake accounts, which we have various defences to prevent and limit.  To evolve to the ever-changing threat landscape, our team continually invests in new technologies for combating inauthentic behaviour on the platform. We are investing in artificial intelligence technologies such as advanced network algorithms that detect communities of fake accounts	interventions – are global policies that are enforced globally by Bing Search, including in EU Member States. Websites that appear in Bing search results are not hosted by Bing and, as such, Bing has limited information about the hosting location of these third-party websites. When addressing spam activity, Bing Search takes action at the global level to benefit Bing users in all countries, which necessarily includes EU Member States. Bing Search's defensive search interventions are also applied at a global level (encompassing all EU member states) and automatically applied to queries searched in all EU languages. Metrics on defensive search interventions and actions taken toward spam websites are provided in SLI 14.2.1.  See also QRE 14.1.1-2.

through similarities in their content and behaviour, computer vision and natural language processing algorithms for detecting Al-generated elements in fake profiles, anomaly detection of risky behaviours, and deep learning models for detecting sequences of activity that are associated with abusive automation. As noted in our most recent global Transparency Report, between January and June 2022, LinkedIn blocked or removed approximately 16.4 million fake accounts, with the majority stopped proactively by our automated defenses (95%) and the rest stopped by manual review.

LinkedIn also acts vigilantly to maintain the integrity of all accounts and to ward off bot and false account activity (including "deep fakes"). LinkedIn enforces the policies in its <u>User Agreement</u> prohibiting the use of "bots or other automated methods to access the Services, add or download contacts, send or redirect messages" through:

- Having a dedicated Anti-Abuse team to create the tools to enforce this prohibition
- Using automated systems detect and block automated activity
- Imposing hard limits on certain categories of activity commonly engaged in by bad actors
- Detecting whether members have installed known prohibited automation software
- Conducting manual investigation and restriction of accounts engaged in automated activity
- Partnering with the broader Microsoft organisation to develop technological solutions for protecting content provenance and identification of deep fakes
- Investing in and using AI to detect coordinated inauthentic activity and communities of fake accounts through similarities in their content and behaviour

- Using third party fact checking sites during the human content review process when suspected deepfakes are flagged or found on the platform
- "Hashing" known instances of deepfake content, which can be used to find copies of the same content on our platform

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

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

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

LinkedIn has and will continue to evaluate what additional metrics it could potentially include in future reporting in light of how LinkedIn's services function and are used.

#### LinkedIn

#### SLI 14.2.1 - SLI 14.2.4

#### TTP 1

The table below addresses TTP 1: "Creation of inauthentic accounts or botnets (which may include automated, partially automated, or non-automated accounts)." The table reports the number of fake accounts that LinkedIn prevented from being created or restricted between 1 - 31 December 2022, broken out by EU Member State. The fake accounts reported are attributed to EU Member States based on the IP address used during registration of the account. 'Number of instances of identified TTPs' and 'Number of actions taken by type' are identical given LinkedIn blocked the registration attempt or restricted the account in all instances.

						0114404					
SLI 14.2.1		SLI 14.2.2				SLI 14.2.3			SLI 14.2.4		
Nr of	Nr of	Views/	Interaction/	Views/	Interaction/	Penetration	Trends on	Trends on	TTPs related	Views/	Interaction
instances	actions	impressions	engagemen	impressions	engagemen	and impact	targeted	narratives	content in	impressions	/
of	taken by	before	t before	after action	t after	on genuine	audiences	used	relation to	of TTP	engageme
identified	type.	action	action		action	users			overall	related	nt with TTP
TTPs.									content on	content (in	related
									the service	relation to	content (in
The	The									overall	relation to
number	number of									views/impre	overall
of fake	fake									ssions on	interaction
accounts	accounts									the service)	/engagem
LinkedIn	LinkedIn										ent on the
prevented	prevented										service)
or	or										
restricted	restricted										
between	between 1										
1 – 31	- 31										
December	December										
2022	2022										

Member												
States												
Austria	8,243	8,243	-	-	-	-	_	-	-	-	-	_
Belgium	16,965	16,965	-	-	-	-	_	-	-	-	-	_
Bulgaria	65,426	65,426	-	-	-	-	-	-	-	-	-	-
Croatia	4,302	4,302	-	-	-	-	-	-	-	-	-	-
Cyprus	1,877	1,877	-	-	-	-	-	-	-	-	-	-
Czech Republic	26,188	26,188	-	-	-	-	-	-	-	-	-	-
Denmark	14,596	14,596	-	-	-	-	-	-	-	-	-	-
Estonia	2,099	2,099	-	-	-	-	-	-	-	-	-	-
Finland	7,619	7,619	-	-	-	-	-	-	-	-	=	-
France	134,761	134,761	-	-	-	-	-	-	-	-	=	-
Germany	108,053	108,053	-	-	-	-	-	-	-	-	-	-
Greece	12,450	12,450	-	-	-	-	-	-	-	-	-	-
Hungary	8,760	8,760	-	-	-	-	-	-	-	-	-	-
Ireland	11,787	11,787	-	-	-	-	-	-	-	-	-	-
Italy	102,650	102,650	-	-	-	-	-	-	-	-	-	-
Latvia	3,771	3,771	-	-	-	-	-	-	-	-	-	-
Lithuania	7,829	7,829	-	-	-	-	-	-	-	-	-	-
Luxembourg	1,284	1,284	-	-	-	-	-	-	-	-	-	-
Malta	1,073	1,073	-	-	-	-	-	-	-	-	-	-
Netherlands	52,504	52,504	-	-	-	-	-	-	-	-	-	-
Poland	51,328	51,328	-	-	-	-	-	-	-	-	-	-
Portugal	15,901	15,901	-	-	-	-	-	-	-	-	-	-
Romania	97,387	97,387	-	-	-	-	-	-	-	-	-	-
Slovakia	4,774	4,774	-	-	-	-	-	-	-	-	-	-
Slovenia	2,149	2,149	-	-	-	-	-	-	-	-	-	-
Spain	63,548	63,548	-	-	-	-	-	-	-	-	-	-
Sweden	22,141	22,141	-	-	-	-	-	-	-	-	-	-
Iceland	-	-	-	-	-	-	-	-	-	-	-	-

			of those acco	unts engaged	with a feed p	ost between ´	1 – 31 December 1 – 31 Decembe	ber 2022.		SLI 14.2.4			
			of those acco	unts engaged	with a feed p	ost between 1	1 – 31 Deceml	ber 2022.				(	
	December 2022. For example, of the 8,243 fake accounts that LinkedIn prevented from being created or restricted between 1 – 31 2022 in Austria (as reported in TTP 1 SLI 14.2.1), 104 of those accounts engaged with a feed post between 1 – 31 December 2022.												
			ccounts report				•			5 5	•		
	in TTP 1 SLI 14.2.1 that reacted to, commented on, or shared (collectively, "engaged with") a feed post between 1 – 31 December 2022.												
TTP 2	The table below addresses TTP 2: "Use of fake / inauthentic reactions (e.g. likes, up votes, comments)." The table reports the number of fake accounts reported												
Total EEA	-	-	-	-	-	-	-	-	-	-	-	-	
Total EU	849,465	849,465	-	-	-	-	-	-	-	-	-	-	
Norway	-	-	-	-	-	-	-	-	-	-	-	-	
	-	-	-	-	-	-	-	-	-	-	-	-	

	SLI 14.2.1					SLI 14.2.3			SLI 14.2.4			
Ī	Nr of	Nr of	Views/	Interaction/	Views/	Interaction/	Penetration	Trends on	Trends on	TTPs related	Views/	Interaction
	instances	actions	impressions	engagemen	impressions	engagemen	and impact	targeted	narratives	content in	impressions	/
	of	taken by	before	t before	after action	t after	on genuine	audiences	used	relation to	of TTP	engageme
	identified	type	action	action		action	users			overall	related	nt with TTP
	TTPs									content on	content (in	related
										the service	relation to	content (in
	The										overall	relation to
	number										views/impre	overall
	of fake										ssions on	interaction
	accounts										the service)	/engagem
	reported											ent on the
	in TTP 1											service)
	SLI 14.1.1											
	that											
	engaged											
	with a											
	feed post											
	between											

	1 – 31											
	December											
	2022											
Member												
States												
Austria	104	-	-	-	-	-	-	-	-	-	-	-
Belgium	385	-	-	-	-	-	-	-	-	-	-	-
Bulgaria	216	-	-	-	-	-	-	-	-	-	-	-
Croatia	48	-	-	-	-	-	-	-	-	-	-	-
Cyprus	78	=	-	-	=	-	-	-	-	-	-	-
Czech Republic	190	-	-	-	-	-	-	-	-	-	-	-
Denmark	147	-	-	-	-	-	-	-	-	-	-	-
Estonia	18	-	-	-	-	-	-	-	-	-	-	-
Finland	58	-	-	-	-	-	-	-	-	-	-	-
France	2,320	-	-	-	-	-	-	-	-	-	-	-
Germany	2,009	=	-	-	-	-	-	-	-	-	-	-
Greece	92	-	-	-	-	-	-	-	-	-	-	-
Hungary	43	-	-	-	-	-	-	-	-	-	-	-
Ireland	90	-	-	-	-	-	-	-	-	-	-	-
Italy	3,738	-	-	-	-	-	-	-	-	-	-	-
Latvia	16	-	-	-	-	-	-	-	-	-	-	-
Lithuania	129	=	-	-	=	-	-	-	-	-	-	-
Luxembourg	16	-	-	-	-	-	-	-	-	-	-	-
Malta	5	-	-	-	-	-	-	-	-	-	-	-
Netherlands	696	=	-	-	=	-	-	-	-	-	-	-
Poland	1,188	-	-	-	-	-	-	-	-	-	-	-
Portugal	305	=	-	=	=	-	-	-	-	-	-	-
Romania	251	-	-	-	-	-	-	-	-	-	-	-
Slovakia	23	-	-	-	-	-	-	-	-	-	-	-
Slovenia	16	-	-	=	-	-	-	-	-	-	-	-

Spain	893	-	-	-	-	-	-	-	-	-	-	-
Sweden	263	-	-	-	-	-	-	-	-	-	-	-
Iceland	-	-	-	-	-	-	-	-	-	-	-	-
Liechtenstein	-	-	-	-	-	-	-	-	-	-	-	-
Norway	-	-	-	-	-	-	-	-	-	-	-	-
Total EU	13,337	-	-	-	-	-	-	-	-	-	-	-
Total EEA	-	-	-	-	-	-	-	-	-	-	-	-

#### TTP 3

The table below addresses TTP 3: "Use of fake followers or subscribers." The table reports the number of fake accounts reported in TTP 1 SLI 14.2.1 that followed a LinkedIn profile or page between 1 – 31 December 2022.

The numbers of fake accounts reported below are a subset of the fake accounts reported in TTP 1 SLI 14.2.1 that followed a LinkedIn profile or page between 1 – 31 December 2022. For example, of the 8,243 fake accounts that LinkedIn prevented from being created or restricted between 1 – 31 December 2022 in Austria (as reported in TTP 1 SLI 14.2.1), 1,045 of those accounts followed a LinkedIn profile or page between 1 – 31 December 2022 (as reported below).

SLI 14.2.1		SLI 14.2.2				SLI 14.2.3			SLI 14.2.4		
Nr of	Nr of	Views/	Interaction/	Views/	Interaction/	Penetration	Trends on	Trends on	TTPs related	Views/	Interaction
instances	actions	impressions	engagemen			and impact	targeted	narratives	content in	impressions	
of	taken by	before	t before	after action	t after	on genuine	audiences	used	relation to	of TTP	engageme
identified	type	action	action		action	users			overall	related	nt with TTP
TTPs									content on	content (in	related
									the service	relation to	content (in
The										overall	relation to
number										views/impre	overall
of fake										ssions on	interaction
accounts										the service)	/engagem
reported											ent on the
in TTP 1											service)
SLI 14.1.1											
that											
followed											

	a LinkedIn											
	profile or											
	page											
	between											
	1 – 31											
	December											
	2022											
Member												
States												
Austria	1,045	-	_	1	-	-	-	-	-	-	-	-
Belgium	1,672	-	-	1	-	-	-	-	-	-	-	-
Bulgaria	12,418	-	-	1	-	-	-	-	-	-	-	-
Croatia	652	-	-	1	-	-	-	-	-	-	-	-
Cyprus	416	-	-	-	-	-	-	-	-	-	-	-
Czech Republic	2,085	-	-	-	-	-	-	-	-	-	-	-
Denmark	981	-	-	-	-	-	-	-	-	-	-	-
Estonia	278	-	-	-	-	-	-	-	-	-	-	-
Finland	563	-	-	-	-	-	-	-	-	-	-	-
France	16,036	-	-	1	-	-	-	-	-	-	-	-
Germany	16,844	-	-	-	-	-	-	-	-	-	-	-
Greece	887	-	-	-	-	-	-	-	-	-	-	-
Hungary	626	-	-	-	-	-	-	-	-	-	-	-
Ireland	752	-	-	-	-	-	-	-	-	-	-	-
Italy	14,724	-	-	-	-	-	-	-	-	-	-	-
Latvia	259	-	-	-	-	-	-	-	-	-	-	-
Lithuania	1,078	-	-	-	-	-	-	-	-	-	-	-
Luxembourg	106	-	-	-	-	-	-	-	-	-	-	-
Malta	35	-	-	-	-	-	-	-	-	-	-	-
Netherlands	5,397	-	-	-	-	-	-	-	-	-	-	-
Poland	11,701	-	-	-	-	-	-	-	-	-	-	-

Portugal	2,198	-	-	-	-	-	-	-	-	-	-	-
Romania	2,290	-	-	-	-	-	-	-	-	-	-	-
Slovakia	335	-	-	-	-	-	-	-	-	=	-	-
Slovenia	224	-	-	-	-	-	-	-	-	-	-	-
Spain	6,344	-	-	-	-	-	-	-	-	=	-	-
Sweden	1,583	-	-	-	-	-	-	-	-	-	-	-
Iceland	-	-	-	-	-	-	-	-	-	-	-	-
Liechtenstein	-	-	-	-	-	-	-	-	-	-	-	-
Norway	-	-	-	-	-	-	-	-	-	-	-	-
Total EU	101,529	-	-	-	-	-	-	-	-	-	-	-
Total EEA	-	-	-	-	-	-	-	-	-	-	-	-

#### TTP 4

The table below addresses TTP 4: "Creation of inauthentic pages, groups, chat groups, I, or domains." The table reports the number of LinkedIn pages or groups that the fake accounts reported in TTP 1 SLI 14.2.1 created between 1 – 31 December 2022.

The numbers of LinkedIn pages or groups created reported below are based on the population of fake accounts reported in TTP 1 SLI 14.2.1. For example, the 8,243 fake accounts that LinkedIn prevented from being created or restricted between 1 – 31 December 2022in Austria (as reported in TTP 1 SLI 14.2.1) created 2 LinkedIn pages or groups between 1 – 31 December 2022 (as reported below).

SLI 14.2.1		SLI 14.2.2				SLI 14.2.3			SLI 14.2.4		
Nr of	Nr of	Views/	Interaction/	Views/	Interaction/	Penetration	Trends on	Trends on	TTPs related	Views/	Interaction
instances	actions	impressions	engagemen	impressions	engagemen	and impact	targeted	narratives	content in	impressions	/
of	taken by	before	t before	after action	t after	on genuine	audiences	used	relation to	of TTP	engageme
identified	type	action	action		action	users			overall	related	nt with TTP
TTPs									content on	content (in	related
									the service	relation to	content (in
The										overall	relation to
number										views/impre	overall
of										ssions on	interaction
LinkedIn										the service)	/engagem
pages or											

	groups created between 1 – 31 December 2022 by the fake accounts reported											ent on the service)
	in TTP 1											
	SLI 14.1.1.											
Member												
States												
Austria	2	-	-	-	-	-	-	-	-	-	-	-
Belgium	3	-	-	-	-	-	-	-	-	-	-	-
Bulgaria	1	-	-	-	-	-	-	-	-	-	-	-
Croatia	0	-	-	-	-	-	-	-	-	-	-	-
Cyprus	0	-	-	-	-	-	-	-	-	-	-	-
Czech Republic	1	-	-	-	-	-	-	-	-	-	-	-
Denmark	0	-	-	-	-	-	-	-	-	-	-	-
Estonia	0	-	-	-	-	-	-	-	-	-	-	-
Finland	1	-	-	-	-	-	-	-	-	-	-	-
France	19	-	-	-	-	-	-	-	-	-	-	-
Germany	19	-	-	-	-	-	-	-	-	-	-	-
Greece	1	-	-	-	-	-	-	-	-	-	-	-
Hungary	0	-	-	-	-	-	-	-	-	-	-	-
Ireland	0	-	-	-	-	-	-	-	-	-	-	-
Italy	39	-	-	-	-	-	-	-	-	-	-	-
Latvia	0	-	-	-	-	-	-	-	-	-	-	-
Lithuania	0	-	-	-	-	-	-	-	-	-	-	-

Luxembourg	0	-	_	-	-	-	-	-	-	-	-	-
Malta	0	-	-	-	-	-	-	-	-	-	-	-
Netherlands	8	-	-	-	-	-	-	-	-	-	-	-
Poland	6	-	-	-	-	-	-	-	-	-	-	-
Portugal	2	-	-	-	-	-	-	-	-	=	-	-
Romania	2	-	-	-	-	-	-	-	-	=	-	-
Slovakia	1	-	-	-	-	-	-	-	-	=	-	-
Slovenia	0	-	-	-	-	-	-	-	-	=	-	-
Spain	6	-	-	-	-	-	-	-	-	=	-	-
Sweden	2	-	-	-	-	-	-	-	-	-	-	-
Iceland	-	-	-	-	-	-	-	-	-	=	-	-
Liechtenstein	-	-	-	-	-	-	-	-	-	-	-	-
Norway	-	-	-	-	-	-	-	-	-	-	-	-
Total EU	113	-	-	-	-	-	-	-	-	=	-	-
Total EEA	-	-	-	-	-	-	-	-	-	-	-	-

Bing Search
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#### **SLI 14.2.1 – SLI 14.2.4**

#### **TTP 10**

The below data reflects figures concerning the amount of queries treated with defensive search interventions during the 1-31 December 2022 ("Reporting Period") and in total.

- This Section addresses TTP No. 10 ("Use of deceptive practices to deceive/manipulate platform algorithms, such as to create, amplify or hijack hashtags, data voids, filter bubbles, or echo chambers"), which is the TTP primarily applicable to Bing Search.
- Although Member State reporting is requested, because Bing Search takes defensive search actions globally (rather than on a per country basis), each defensive search action would necessarily be implemented in an EU member state, and it is not feasible to provide member state reporting for such globally actioned metrics. Therefore, Bing has provided global figures for defensive search treatments below.
- For SLI 14.2.2 Bing Search cannot provide the requested information on views, impressions, likes, engagement, etc. as this is not applicable to search engines and defensive search interventions.

-	For SLI 14.2.3 - This SLI is not applicable to search engines, as Bing Search is not an online platform that allows for user hosted content or public sharing of
	user generated content with other users. User accounts in the manner contemplated under this provision are not available in search (i.e. registered user
	accounts are not capable of amplifying creating or amplifying content as one may through a social media network).

-	For SLI 14.2.4 – This SLI is	s also not applicable to searc	ch engines for the above reasons.

				SLI 14.2.2	2			SLI 14.2.3			SLI 14.2.4		
	Nr of	Nr of actions	Nr of actions	Views/	Interaction/	Views/	Interaction	Penetrati	Trends on	Trends	TTPs	Views/	Interaction/
	instan	taken by	taken by type	impressi	engagemen	impressions	/	on and	targeted	on	related	impressions	engagemen
	ces of	type		ons	t before	after action	engageme	impact	audiences	narrative	content in	of TTP	t with TTP
	identif		Net new	before	action		nt after	on		s used	relation to	related	related
	ied	Total	queries	action			action	genuine			overall	content (in	content (in
	TTPs	queries	addressed					users			content on	relation to	relation to
		treated with	with								the service	overall	overall
		"defensive	"defensive									views/impre	interaction/
		search"	search"									ssions on	engagemen
		algorithmic	intervention									the	t on the
		interventio	s during									service65)	service)
		ns globally:	Reporting										
		(as of 1-31	Period:										
		December											
		2022)											
Member							N/A I	 napplicable	to Search Er	ngines			
States		-	=					• •		-			
Total		38.5 million	198,000										
Global													

Measure 14.3	LinkedIn	Bing Search
QRE 14.3.1	We look forward to working with other signatories in the context of the Task-force on this Commitment.	Bing Search looks forward to working with other signatories in the context of the Task-force on this Commitment, taking into account the specific nature of search engines, as further outlined under SLI 14.2.1 – 14.2.4.

# **IV. Integrity of Services**

# Commitment 15

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

	C.15	M 15.1	M 15.2
We signed up to the	LinkedIn	LinkedIn	LinkedIn
following measures of	Bing Search	Bing Search	Bing Search
this commitment:			
	LinkedIn		Bing Search
In line with this	No		No
commitment, did you			
deploy new			
implementation			
measures (e.g. changes			
to your terms of			
service, new tools, new			
policies, etc)? [Yes/No]			

If yes, list these	New Implementation Measures	New Implementation Measures		
implementation				
measures here .	Not applicable	Not applicable, as Bing Search currently does not offer Al systems t generate or manipulate content in the EU.		
Do you plan to put	Yes	No		
further implementation				
measures in place in				
the next 6 months to				
substantially improve				
the maturity of the				
implementation of this				
commitment? [Yes/No]				
If yes, which further	Planned Implementation Measures	Planned Implementation Measures		
implementation				
measures do you plan	Currently not applicable. If/when such features are launched, LinkedIn	Currently not applicable. If/when such features are launched, Bing Search		
to put in place in the	will determine any appropriate measures to implement in addition to	will determine any appropriate measures to implement in addition to the		
next 6 months?	the Microsoft Responsible Al Standard.	Microsoft Responsible AI Standard discussed below.		
Measure 15.1	LinkedIn	Bing Search		
		As of the reporting period, Bing Search does not offer Al systems that generate or manipulate content in the EU.		
		Nonetheless, Microsoft does have policies in place that Bing Search will adhere to if/when such features are launched. Any Microsoft process, program, or tool utilising AI, including Bing Search, must adhere to Microsoft's Responsible AI Standard and undertake Impact Assessments to help ensure responsible use of AI-influenced algorithms and processes for any new product features. More details are located at Microsoft's Responsible AI hub: Responsible AI principles from Microsoft. See also Microsoft's involvement in the Partnership on AI, discussed at QRE 20.1.1.		

Measure 15.2	LinkedIn	Bing Search
Measure 15.2  QRE 15.2.1	LinkedIn  Not appliable	As a search engine, Bing Search operates very differently from social media websites and other online platforms that host content. Bing Search does not host user-generated content and does not use algorithms to detect, moderate or sanction user-provided content except for limited circumstances outside the scope of this Code of Practice (e.g., the use of PhotoDNA software to detect and report child sexually explicit imagery uploaded to visual search). As to third party websites indexed by Bing Search, Bing Search does not use algorithms to detect, monitor, or sanction such websites, except for limited circumstances outside the scope of this Code of Practice (e.g., the use of PhotoDNA software to detect and report child sexually explicit imagery). Bing users have many legitimate reasons for seeking out content in search that may be harmful or offensive in other contexts, and so Bing Search works to provide as comprehensive and useful of a collection of results as possible and does not proactively intervene to limit access to legal content. In some limited cases Bing Search may take
		action to remove or limit access to third party links where quality, safety, user demand, relevant laws, and/or public policy concerns exist, but these interventions are reactive; Bing does not engage in proactive algorithmic interventions.

## **IV. Integrity of Services**

## Commitment 16

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

	C.16 M 16.1		M 16.2		
We signed up to the	LinkedIn LinkedIn		LinkedIn		
following measures of	Bing Search	Bing Search			
this commitment:					
	LinkedIn		Bing Search		
In line with this	No		No		
commitment, did you					
deploy new					
implementation					
measures (e.g. changes					
to your terms of					
service, new tools, new					
policies, etc)? [Yes/No]					
If yes, list these	New Implementation Measures		New Implementation Measures		
implementation					
measures here .	Not applicable		Not applicable		
Do you plan to put	Yes		Yes		
further implementation					
measures in place in					
the next 6 months to					
substantially improve					
the maturity of the					

implementation of this commitment? [Yes/No]				
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures  We look forward to working on this commitment with the other signatories as we develop further cross platform information sharing.	Planned Implementation Measures  We look forward to working on this commitment with the other signatories as we develop further cross platform information sharing.		
Measure 16.1	LinkedIn	Bing Search		
QRE 16.1.1	LinkedIn, through Microsoft, is an active participant in and contributor to the Task-force's Crisis Response subgroup, in which it proactively provides analysis and data, related to influence operations, foreign interference in information space and relevant incidents that emerges on its service. Microsoft's internal threat detection and research teams, including Digital Threat Analysis Center (DTAC), Microsoft Threat Intelligence Center (MSTIC), Microsoft Research (MSR), and Al For Good, collect and analyse data on actors of disinformation, misinformation and information manipulation across platforms. These teams work with external organisations and companies to share and ingest data that help support Microsoft product and service teams effectively respond to issues and threats.	the Task-force's Crisis Response subgroup, in which it proactively pro- analysis and data related to influence operations, foreign interferen- information space and relevant incidents that emerges on its se Microsoft's internal threat detection and research teams, including D Threat Analysis Center (DTAC), Microsoft Threat Intelligence Center (MS, Microsoft Research (MSR), and Al For Good, collect and analyse data actors of disinformation, misinformation and information manipular across platforms. These teams work with external organisations companies to share and ingest data that help support Microsoft products service teams effectively respond to issues and threats.		
	Moreover, LinkedIn works with numerous partners to facilitate the flow of information to tackle purveyors of disinformation, including disinformation spread by state-sponsored and institutional actors.			
	LinkedIn maintains an internal Threat Prevention and Defense team composed of threat investigators and intelligence personnel to address disinformation. This team works with various other internal teams, including our Artificial Intelligence modelling team, to develop leads into threat actor campaigns. The leads are then manually			

	verified, and confirme	ed TTPs (Tactics, Technic	ques, and Procedures)			
		of Compromise) relating	•			
	shared with other external stakeholders, including, for example,					
	industry peers. Any associated disinformation content is verified by					
	our internal or external fact-checkers, and coordinated inauthentic					
	behaviours (CIBs) are also removed by our Threat Prevention and					
	Defense team.					
	LinkedIn, along with its parent company, Microsoft, is heavily involved					
	in threat exchanges. These threat exchanges take various forms, such					
	as: 1) regular discussion amongst industry peers to discuss high-level					
	trends and campaigns; and, 2) one-on-one engagement with					
	individual peer companies to discuss TTPs and IOCs. This exchange					
	of information leads to a better understanding of the incentives of					
	sophisticated and well-funded threat actors and how they evolve their					
	TTPs to achieve those goals, which assists us in their identification and					
	removal.					
	LinkedIn always stands ready to receive and investigate any leads we					
	receive from peers and other external stakeholders. In addition to					
	one-on-one engagement with peers, we also consume intelligence					
	from vendors and investigate any TTPs and IOCs made available in					
	peer disclosures. In turn, we also regularly release information about					
	disinformation on our platform in publicly-available transparency					
	reports and blog posts.					
	Methodology of data measurement			Methodology of data measurement		
SLI 16.1.1 – Numbers						
of actions as a result	We look forward to providing reports in the next reporting period to			We look forward to providing reports in the next reporting period to discuss		
of information	discuss progress under this measure.			progress under this measure.		
sharing	Nr of actions taken	Type of detected	Other relevant	Nr of actions taken (total)	Type of detected	Other relevant metrics
	(total)	content	metrics		content	

Member States	-	-	-	-	-	-
Measure 16.2	LinkedIn			This Measure is not relevant or pertinent to Bing Search because this service does not have users who can share content across services.		
QRE 16.2.1	We look forward to working on this commitment with the other signatories as we develop further cross-platform information sharing.					

# V. Empowering Users Commitments 17 - 25

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

## Commitment 17

In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, Relevant Signatories commit to continue and strengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups.

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

	LinkedIn	Bing Search
In line with	Yes	Yes
this		
commitment,		
did you		
deploy new		
implementatio		
n measures		
(e.g. changes		
to your terms		
of service,		
new tools,		
new policies,		
etc)? [Yes/No]		
If yes, list	New Implementation Measures	New Implementation Measures
these		
implementatio		

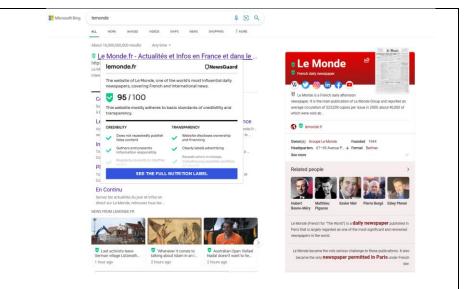
n measures	Microsoft has partnered with three third-party organisations to fund	Microsoft has partnered with three third-party organisations to fund media literacy
here .		campaigns and then provided pro-bono advertising space across Microsoft surfaces to
	across Microsoft surfaces to disseminate the literacy campaigns.	disseminate the literacy campaigns.
	, , -	
	LinkedIn has also recently published an article on our Help Center	
	compiling useful resources on misinformation and inauthentic	
	behaviour.	
Do you plan	Yes	Yes
to put further		
implementatio		
n measures in		
place in the		
next 6 months		
to		
substantially		
improve the		
maturity of		
the		
implementatio		
n of this		
commitment?		
[Yes/No]		
If yes, which	Planned Implementation Measures	Planned Implementation Measures
further		
implementatio		Microsoft will expand its efforts to fund and promote media literacy campaigns into
n measures do		more EU markets and languages. Microsoft will also be announcing additional media
you plan to	announcing additional media literacy programs that include greater	literacy programs that include greater language access in early 2023.
put in place in	language access in early 2023.	
the next 6		
months?		

Measure 17.1	LinkedIn	Bing Search
QRE 17.1.1	As the world around us changes, LinkedIn continues to evolve and adapt our systems and practices for combating misinformation and other inauthentic behaviour on our platform, including to respond to the unique challenges presented by world events. In addition to broader	Bing Search offers a number of tools to help users understand the context and trustworthiness of search results. Even in circumstances where a user is expressly seeking low authority content (or if there is a data void so little to no high authority content exists for a query), Bing Search provides tools to users that can help improve their digital literacy and avoid harms resulting from engaging with misleading or inaccurate content. For example:  - Bing Search often includes answers or public service announcements at the top of search results pointing users to high authority information on a searched topic or warnings on particular URLs known to contain harmful information (such as unaccredited online pharmacies and sites containing malware).  - Where circumstances warrant (such as public health crises or major elections), Bing Search may provide information hubs for users to easily access a centralised repository of high authority information. See for example, the COVID 19 Information Hub, discussed further at QRE 22.7.1.  - Microsoft also partners with NewsGuard to help users evaluate the quality of the news they encounter online. NewsGuard to help users understand the reliability of news sources. Within the EU, NewsGuard is currently available in France, Germany, and Italy with plans for future expansion. Microsoft offers NewsGuard as a free plug-in for the Microsoft Edge web browser (it is also available for other browsers including Chrome and Firefox), and users of the Edge mobile application on both iOS and Android can enable NewsGuard ratings in their app settings. For users with the NewsGuard plug-in, Bing Search results include NewsGuard

- LinkedIn's internal, global team of global experienced news editors also proactively provide members with curated news about current events from trusted sources in a number of languages, and its content moderation teams closely monitor associated conversations in languages including, for example, Russian, Ukrainian, German, Dutch, and French.
  - LinkedIn's team of editors cover the most recent developments of Russia's invasion of Ukraine, ranging from the economic impact to major military events that are taking place.
- In connection with the 2022 French elections, LinkedIn created a series of videos with the aim to educate LinkedIn members on and off the platform about key trust topics, including how to <u>build a trusted community</u> and how to <u>personalise a LinkedIn Feed</u>. The campaign kicked off two weeks before the first round of the Presidential election. During the election period, we also highlighted how members can find trusted information, for example in a <u>LinkedIn Company page post</u> in French, or in a <u>LinkedIn post</u> by our Country Manager.

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

LinkedIn's <u>Professional Community Policies</u> clearly detail the objectionable and harmful content that is not allowed on LinkedIn. Misinformation and inauthentic content is not allowed, and our automated defenses take proactive steps to remove them. LinkedIn's blog provides information regarding our efforts, including <u>How We're</u>

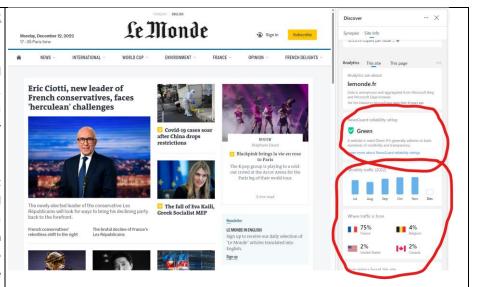


Bing Search also provides information to Microsoft Edge users about the content of the websites they are browsing to via the Bing-powered Discover pane, including third party information about the website's provenance and, where available, the site's reliability rating from NewsGuard. A screenshot depicting a News Guard reliability rating from the Discover panel in Edge is shown below for the French newspaper Le Monde's official website.

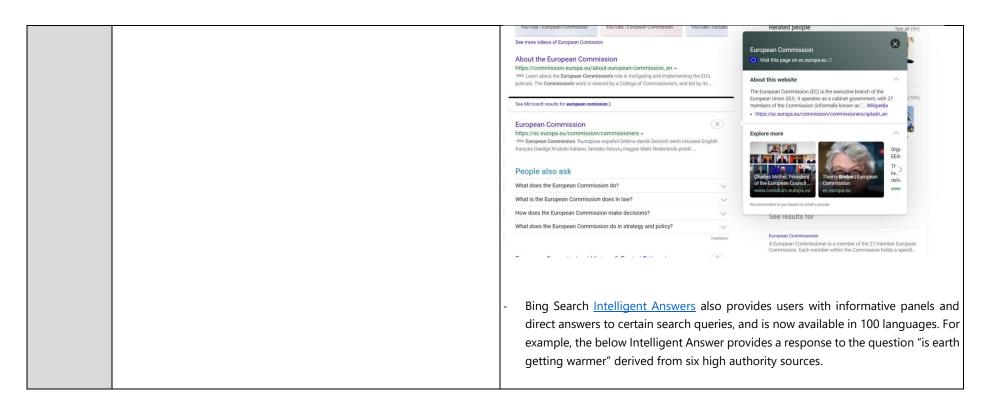
<u>Protecting Members From Fake Profiles, Automated Fake Account Detection, and An Update on How We Keep Members Safe.</u>

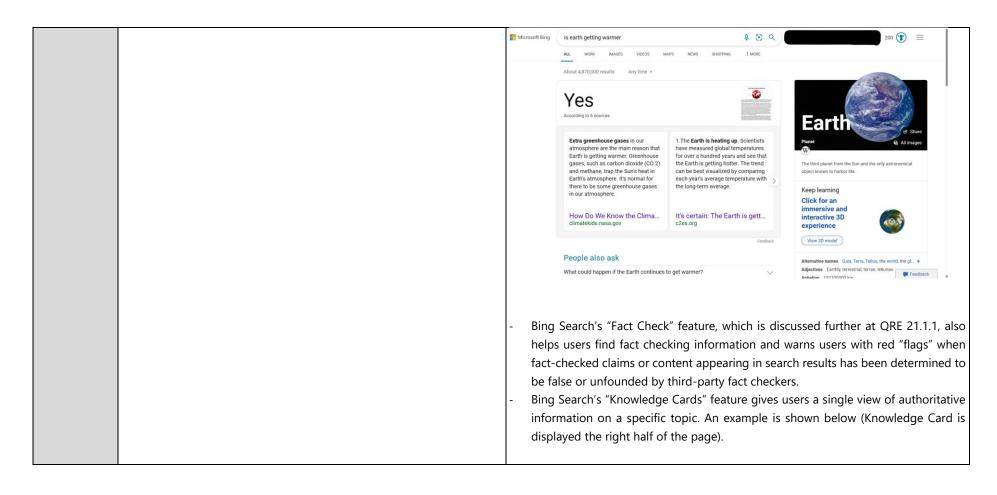
LinkedIn members can <u>report content</u> that violates our Professional Community Policies, including misinformation and inauthentic content. Our Trust and Safety teams work every day to identify and restrict such activity, and if reported content violates the Professional Community Policies, it will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

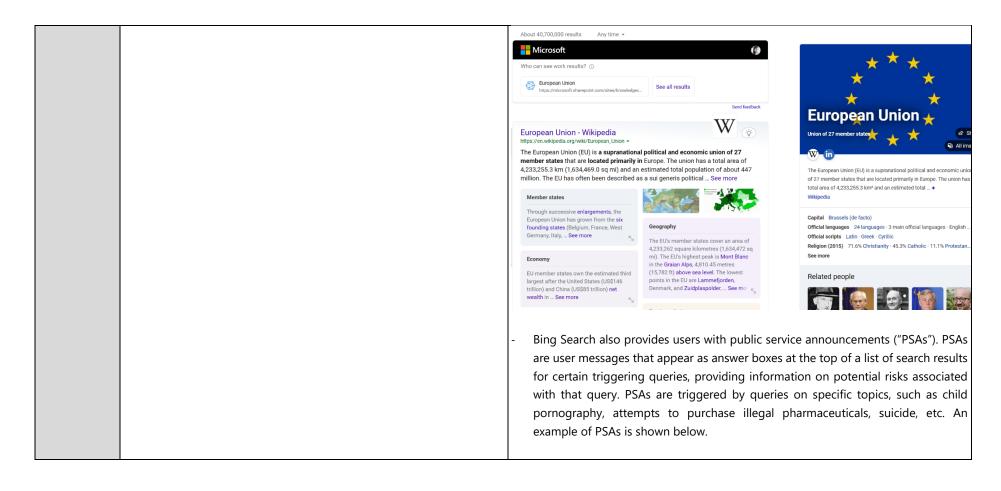
LinkedIn members can identify misinformation and inauthentic behaviour by utilising the News Literacy Project, The Trust Project and Verified, all of which develop information literacy campaigns built on industry research and best practices. The News Literacy Project campaign developed a quiz that tests a person's ability to identify why the information they are seeing is false and inaccurate in less than five minutes. The Trust Project campaign developed the research-backed 8 Trust Indicators, which aim to improve consumers ability to identify reliable, ethical journalism. Finally, Verified delivers lifesaving information and fact-based advice to build digital literacy that helps communities protect themselves from misinformation.

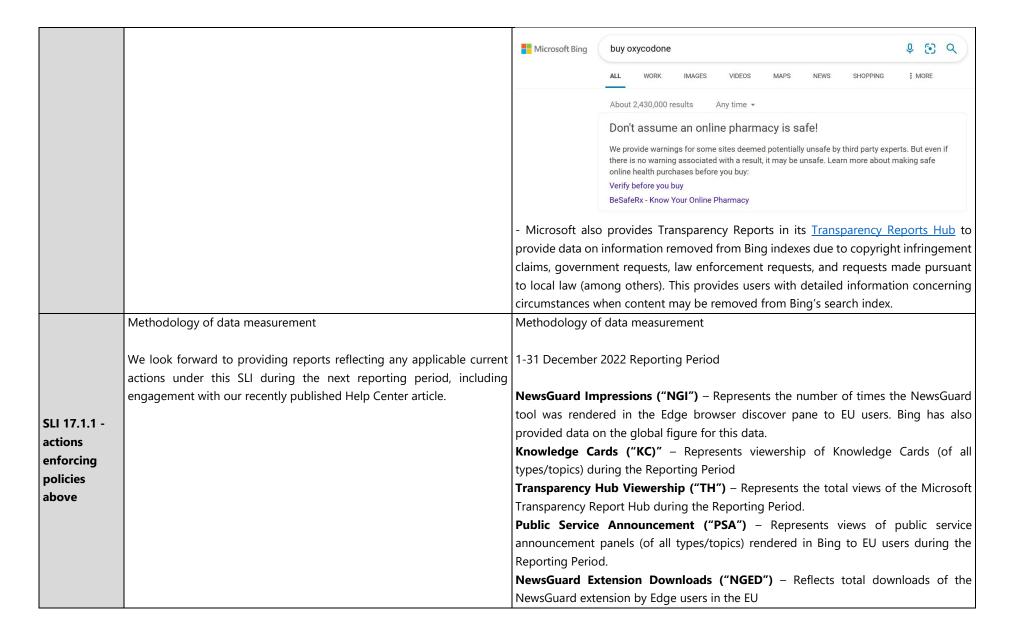


Bing Search's <u>Page Insights</u> feature also helps direct users to authoritative resources and information. The feature, which appears as a light bulb image next to search results, provides users with additional information about the site and its contents from third party information sites such as Wikipedia. An example is shown below.









		C		Covid-19 Informat	Covid-19 Information Hub – See SLI 22.7.1 for data on usage of the COVID-19					
					Information Hub.					
	Total count	Interactions/	Other	Other relevant metrics	Total count of the	Total count of	Total count of	Total count	Other	
	of the tool's	5 5			tool's impressions	the tool's	the tool's	of the tool's	relevant	
	impressions	with the tool	metrics			impressions	impressions	impressions	metrics	
					NGI	кс	тн	PSA	NGED	
Member										
States										
Austria					2,475	17.03M	0	900	33	
Belgium					2,917	26.08M	98	4,560	25	
Bulgaria					305	5.22M	8	200	19	
Croatia					205	3.25M	5	200	5	
Cyprus					134	1.73M	9	100	2	
Czech					2,063	14.55M	0	740	15	
Republic										
Denmark					1,021	9.07M	79	440	12	
Estonia					86	1.88M	13	240	3	
Finland					859	9.14M	50	440	10	
France					14,320	146.84M	153	6,040	387	
Germany					29,295	183.34M	541	8,100	316	
Greece					1,180	6.59M	18	340	19	
Hungary					1,203	6.30M	29	260	12	
Ireland					936	18.07M	81	2,140	24	
Italy					6,899	81.69M	97	3,880	320	
Latvia					70	2.27M	7	120	3	
Lithuania					131	3.61M	20	340	5	
Luxembourg					82	1.43M	14	0	2	
Malta					48	1.47M	0	120	0	
Netherlands					3,448	40.90M	168	2,880	34	

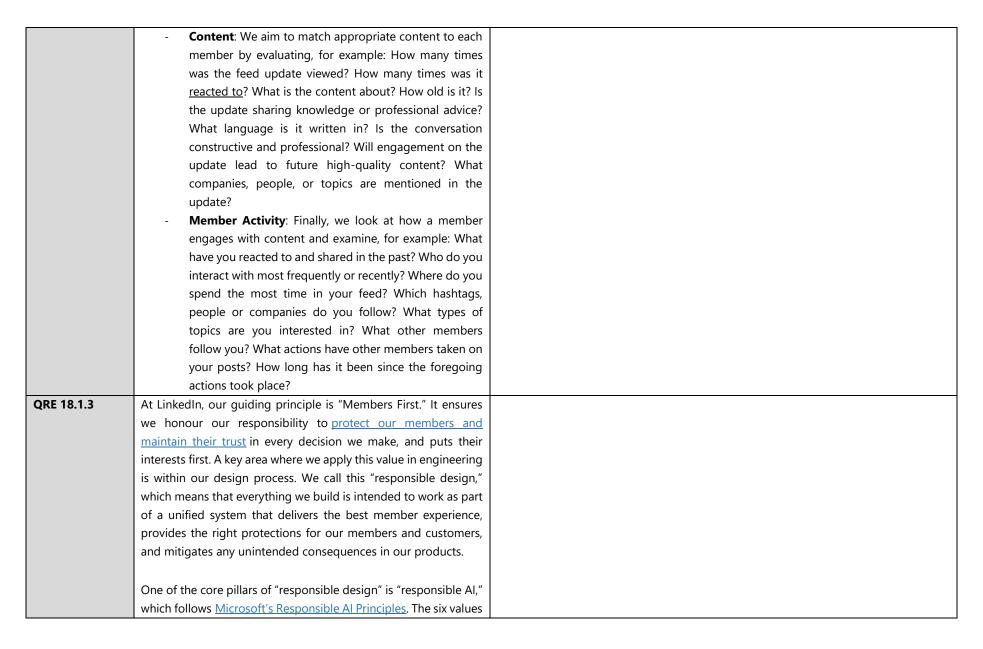
				6,642	49.60M	135	2,320	22	
				1,903	14.74M	37	980	23	
				745	10.43M	27	500	18	
				336	3.80M	13	260	6	
				147	2.13M	7	220	4	
				5,173	82.45M	76	2,940	36	
				1,588	23.34M	131	1,520	25	
				49	864.12K	0	60	0	
				15	67.88K	0	0	0	
				902	11.20M	0	960	15	
				84,211	766.94M	1816	40,780	1,380	
				85,177	779.07M	1816	41,800	1,395	
				514,421	N/A	N/A	N/A	N/A	
LinkedIn	<u>.</u>			Bing Search					
Microsoft has worke	d with three org	anisations to c	levelop and promote	Microsoft has worked with three organisations to develop and promote media literacy					
media literacy camp	aigns, one of wh	ich created by	Verify, a	campaigns, one of which created by Verify, a collaboration between Purpose and the					
collaboration between	en Purpose and	the United Nat	tions, thus far being	United Nations, thus far being targeted at the EU market. For the next reporting					
		out reporting n	period Microsoft will	period, Microsoft will work with existing and new partners to create, disseminate, and					
targeted at the EU n	narket. For the n	ext reporting p	criou, imerosore iiii	period, Microsoft Will	work with existing	and new partners	to create, disse	eminate, and	
targeted at the EU n work with existing a				report on expanded li	_	•			
work with existing a	nd new partners y campaigns in E	to create, diss U markets, inc	eminate, and report luding in additional	I.	teracy campaigns	n EU markets, inclu			
work with existing a	nd new partners y campaigns in E	to create, diss U markets, inc	eminate, and report luding in additional	report on expanded li	teracy campaigns	n EU markets, inclu			
work with existing an on expanded literacy EU languages. Pleaso	nd new partners y campaigns in E e also see respoi	to create, diss U markets, inc	eminate, and report luding in additional	report on expanded lit languages. Please also	teracy campaigns in see response to (	n EU markets, inclu			
work with existing a	nd new partners y campaigns in E e also see respoi	to create, diss U markets, inc	eminate, and report luding in additional	report on expanded li	teracy campaigns in see response to (	n EU markets, inclu			
work with existing an on expanded literacy EU languages. Pleaso	nd new partners y campaigns in E e also see respoi	to create, diss U markets, inc	eminate, and report luding in additional	report on expanded lit languages. Please also	teracy campaigns in see response to (	n EU markets, inclu			
work with existing an on expanded literacy EU languages. Pleaso	nd new partners y campaigns in E e also see respoi	to create, diss U markets, inc	eminate, and report luding in additional	report on expanded lit languages. Please also	teracy campaigns in see response to (	n EU markets, inclu			
work with existing an on expanded literacy EU languages. Pleaso	nd new partners y campaigns in E e also see respoi	to create, diss U markets, inc	eminate, and report luding in additional	report on expanded lit languages. Please also	teracy campaigns in see response to (	n EU markets, inclu			
work with existing an on expanded literacy EU languages. Pleaso	nd new partners y campaigns in E e also see respoi	to create, diss U markets, inc	eminate, and report luding in additional	report on expanded lit languages. Please also	teracy campaigns in see response to (	n EU markets, inclu	uding in additi	onal EU	
work with existing and expanded literacy EU languages. Please Methodology of dat	nd new partners y campaigns in E e also see respoi a measurement	to create, diss U markets, inc nse to QRE 17.	eminate, and report luding in additional 1.1.	report on expanded literation languages. Please also Methodology of data	teracy campaigns of see response to Comments	in EU markets, inclu QRE 17.1.1.	uding in additi	ctions with	
	Microsoft has worke media literacy camp collaboration betwe	Microsoft has worked with three org media literacy campaigns, one of wh collaboration between Purpose and	Microsoft has worked with three organisations to o media literacy campaigns, one of which created by collaboration between Purpose and the United Nat		1,903  745  336  147  5,173  1,588  49  15  902  84,211  85,177  1514,421  LinkedIn  Microsoft has worked with three organisations to develop and promote media literacy campaigns, one of which created by Verify, a collaboration between Purpose and the United Nations, thus far being	1,903 14.74M  1,	1,903 14,74M 37  1,903 1,903 14,74M 37  1,903 1,903 14,74M 37  1,903 1,903 1,903  1,9	1,903 14,74M 37 980  1,903 14,74M 37 980  745 10,43M 27 500  336 3,80M 13 260  147 2,13M 7 220  147 2,13M 7 220  15,173 82,45M 76 2,940  1,588 23,34M 131 1,520  49 864,12K 0 60  15 67,88K 0 0 0  15 67,88K 0 0 0  902 11,20M 0 960  15 67,88K 0 0 960  15 67,88K 1816 40,780  1816 40,780  1816 41,800  1816 4	

	organised/ participated in				activities organised/ participated in			
Member States	Spain				Spain			
List actions per member states	1	TBD	TBD	TBD	1	TBD	TBD	TBD
Measure 17.3	LinkedIn			Bing Search				
QRE 17.3.1	Microsoft has worked with three organisations to develop and promote media literacy campaigns, one of which created by Verify, a collaboration between Purpose and the United Nations, thus far being not targeted at the EU market. For the next reporting period, Microsoft will work with existing and new partners to create, disseminate, and report on expanded literacy campaigns in EU markets, including in additional EU languages. Please also see response to QRE 17.1.1.				campaigns, one of wh United Nations, thus period, Microsoft will	nich created by 'far not being ta work with existi literacy campai	Verify, a collabora rgeted at the EU ng and new parti gns in EU marki	lop and promote media literacy ation between Purpose and the market. For the next reporting ners to create, disseminate, and ets, including in additional EU

	V. Empowering Users					
	Commitment 18					
Polovant Signs	Relevant Signatories commit to minimise the risks of viral propagation of Disinformation by adopting safe design practices as they develop their systems,					
Relevant Signa	atories commit to mi	mimise the risks of viral prop		resign practices as they develop their systems,		
			policies, and features.			
	C.18	M 18.1	M 18.2	M 18.3		
We signed up to	LinkedIn	LinkedIn	LinkedIn	LinkedIn		
the following	Bing Search	Bing Search Bing Search Bing Search				
measures of this						
commitment:						

	LinkedIn	Bing Search
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	Yes	No No
If yes, list these implementation measures here .	New Implementation Measures  - Publication of revised information on recommender systems - Included link to above information in the LinkedIn User Agreement	New Implementation Measures  Bing's existing programs are already designed to address these issues, but, of course, Bing regularly evaluates the efficacy of its measures and endeavors to improve and work to respond quickly to new threats or issues as they arise.
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	No	No No

If yes, which	Planned Implementation Measures	Planned Implementation Measures
further		
implementation	Not applicable	Bing's existing programs are already designed to address these issues, but, of course,
measures do you		Bing regularly evaluates the efficacy of its measures and endeavors to improve and
plan to put in		work to respond quickly to new threats or issues as they arise.
place in the next		
6 months?		
Measure 18.1	LinkedIn	This measure is not relevant or pertinent to Bing Search as search engines do not fuel
		virality of disinformation via users sharing content.
QRE 18.1.1	With respect to Al design, please see QRE 18.1.3	
	With respect to additional tools, procedures, or features, please	
	see:	
	- QRE 17.1.1 (editorial practices to provide members with	
	trustworthy news);	
	- QRE 18.2.1 (policies and procedures to limit spread of	
	harmful false or misleading information);	
	- QRE 21.1.1 (action taken when information is identified	
	as misinformation);	
	- QRE 22.1.1 (features and systems related to fake and	
	inauthentic profiles);	
	- QRE 22.2.1 (actions taken to assist members identify	
	trustworthy content);	
	- QRE 23.2.1 (actions taken to ensure integrity of	
	reporting and appeals process).	
QRE 18.1.2	The main parameters of the LinkedIn feed recommender	
	systems are as follows:	
	- <b>Identity</b> : We seek to contextualise content based on	
	who a member is by looking at their profile, for example:	
	Who are you? Where do you work? What are your skills?	
	Who are your connections? Where is your profile	
	location?	



that we build into our products include fairness, reliability and safety, privacy and security, inclusiveness, transparency, and accountability. In addition to the six values, responsible AI is also about intent and impact. "Intent" involves evaluating training data, designing systems, and reviewing model performance before the model is ever deployed to production to make sure that our principles are reflected at every step in the process. It includes actively changing our products and algorithms to empower every member. "Impact" covers detecting and monitoring the ways that people interact with products and features after they are deployed. We do this by measuring whether they provide significant value and empower individuals to reach their goals. Intent and impact are a cyclical process of refinement that go hand-in-hand towards the broader goal of responsible design.

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

	violations are su	above process to	ed and how mu	ch is still left on				
	· ·	nother important t						
	· .	that we can contir	-	•				
	improve detection	on and prevention	of violative cor	ntent.				
	Please also see:							
	- QRE 17	.1.1 (editorial prac	ctices to provide	e members with				
		rthy news);						
		.2.1 (policies and	•					
		I false or misleadi	_					
		.1.1 (action taken	when informati	ion is identified				
		nformation);						
		2.1.1 (features and	d systems relate	ed to fake and				
		ntic profiles);						
		2.2.1 (actions take	en to assist me	embers identify				
		orthy content);		. :				
		3.2.1 (actions to		e integrity of				
		ng and appeals pr						
	Methodology of	data measureme	nı					
SLI 18.1.1 -	We look forward	to reporting on t	he measures ou	ıtlined in ORF				
actions proving		reporting period.	are measures of	itilied iii Qile				
effectiveness of		operg periodi						
measures and	Reduction of	Reduction of	Increase in	Other	Reduction of	Reduction of views/	Increase in visibility of	Other relevant
policies	prevalence of	views/	visibility of	relevant	prevalence of	impressions of	authoritative information	metrics
	disinformation	impressions of	authoritative	metrics	disinformation	disinformation		
		disinformation	information					
Member States	-	-	-	-				

Measure 18.2	LinkedIn	Bing Search
QRE 18.2.1	LinkedIn is an online professional network. On LinkedIn, the world's professionals come together to find jobs, stay informed, learn new skills, and build productive relationships. The content that our members share becomes part of their professional identity and can be seen by their boss, colleagues, and potential business partners. Accordingly, the content on LinkedIn is professional in nature.  To help keep LinkedIn safe, trusted, and professional, our Professional Community Policies clearly detail the range of objectionable and harmful content that is not allowed on	Unlike social media services, for which this Commitment appears primarily oriented, search engines do not typically cause or facilitate the viral propagation of disinformation. Please see <a href="How Bing delivers search results">How Bing delivers search results</a> and <a href="Microsoft Bing Webmaster Guidelines">Microsoft Bing Webmaster Guidelines</a> for an overview of how Bing Search's algorithms endeavor to deliver high authority and highly relevant content while minimising the negative impact of spam and less credible information sources. Bing Search's ranking algorithm and related policies are intended to address deceptive tactics intended to manipulate the algorithms and are discussed in more detail at QREs 14.1.1 and 14.1.2. Bing features such as Answers, Page Insights, NewsGuard ratings, and ClaimReview fact checks, which are discussed at QRE 17.1.1. and 21.1.1, as well as the other features and policies discussed throughout this report further help minimise the risk of viral propagation of
	LinkedIn. Fake accounts, misinformation, and inauthentic content are not allowed, and we take active steps to remove it from our platform.  LinkedIn defines misinformation as "specific claims, presented as fact, that are demonstrably false or substantially misleading." This definition applies globally and is used for purposes of content moderation and for publicly reporting figures on misinformation. Specific examples of what might constitute misinformation can be found <a href="here">here</a> in our Help Center. As part of our <a href="User Agreement">User Agreement</a> , our Professional Community Policies are accepted by every member when signing up to LinkedIn's service and are easily available to every member.	misinformation through Bing Search.  Nonetheless, Bing Search undertakes measures to help ensure it does not inadvertently lead users to misleading or other harmful content the user was not looking for, primarily by seeking to prevent the display of problematic <a href="auto-suggest">auto-suggest</a> and related search suggestions ("AS/RS"). Bing's AS/RS functionalities work by suggesting queries to users as they type to facilitate a more efficient search experience. Bing takes measures to prevent inappropriate, offensive, or harmful predictions from appearing using a combination of proactive and reactive algorithmic and manual interventions. Bing may remove AS/RS terms for various policy reasons, including the potential that a query or suggestion is likely to mislead or lead to misleading results. Bing relies on its internal trustworthy search principles in assessing whether AS/RS terms should be removed.
	LinkedIn creates value and preserves trust by fostering a safe, trusted, and professional platform, while honouring members' professional expression and speech. LinkedIn enables healthy onplatform conversations by facilitating the removal of misinformation that threatens its members' safety. And when	Bing also provides a tool for users to provide feedback on auto-suggest and related search queries they encounter. The feedback tool is shown below.

content doesn't conclusively violate LinkedIn policies, LinkedIn why is the sky blue × ₽ 💽 Q gives the speaker the benefit of the doubt and favours speech Q why is the sky Q why is the sky blue Q why the skies are blue (i.e., leaves the content up on platform). Q why is the sky yellow Q why is the sky green Q why is the sky blue on earth Q why is the sky blue for kids Q why is the sky orange Content Additionally, as described in greater detail below, human review Q why is the sky red Q Is the sky really blue and why? It's Fasy to See plays a significant role in our content moderation process. Q why is the sky purple What Makes A . Q Why is the sky used to be more blue? Search Microsoft for "why is the sky" Additionally, Members who post content and members who Is The Sky Blue report content can appeal our content moderation decisions. it took a long time to figure it out! The light Our content policies are clear and we apply them equally for all Clicking "Feedback on these suggestions" allows users to provide specific feedback on members. Within our Professional Community Policies we individual suggestions on the below bases: provide granular information and examples on what is and what These suggestions are: is not allowed on LinkedIn. Not relevant Furthermore, LinkedIn has automated defences to identify and Not correct prevent abuse, including inauthentic behaviour, such as spam, phishing and scams, duplicate accounts, fake accounts, and Misspelled or garbled misinformation. Our Trust and Safety teams work every day to Inappropriate or offensive identify and restrict inauthentic activity. We're regularly rolling Hateful to groups or individuals out scalable technologies like machine learning models to keep our platform safe. About illegal or dangerous activity Other As inauthentic behaviour gets more sophisticated, we're improving our detection. Here are some of the latest actions we've taken on fake profiles to help keep our members safe while engaging in our community. Methodology of data measurement Methodology of data measurement SLI 18.2.1 actions taken in The table below reports metrics concerning content LinkedIn Bing Search does not have data relevant to this SLI. Users come to Bing Search with a response to removed from its platform as Misinformation, pursuant to the specific research topic in mind and expect Bing Search to provide links to the most policy violations policy outlined in QRE 18.2.1 above. The metrics include: relevant and authoritative third-party websites on the Internet that are responsive to

	Misinformation between 1 - 31 December 2022, broken out by EU Member State;  - (2) the number of those content removals that were appealed by the content author;  - (3) the number of those appeals that were granted;  - (4) the median time from appeal-to-appeal decision for those appeals. The metrics are assigned to EU Member State based on the self-reported profile location of the				=	ot have a news feed for users nable content to go "viral".	s, allow users to	
	The number of pieces of content removed as Misinformation between 1 - 31 December 2022	The number of removals that were appealed by the content author	The number of appeals that were granted	The median time from appeal-to-appeal decision	Total no of violations	Metric 1: indicating the impact of the action taken	Metric 2: indicating the impact of the action taken	Metric 3: indicating the impact of the action taken
Member States	2022				N/A	N/A	N/A	N/A
Austria	45	1	0		,	,	•	,
Belgium	89	0	0					
Bulgaria	19	0	0					
Croatia	13	0	0					
Cyprus	5	0	0					
Czech Republic	36	3	1					
Denmark	92	2	0					
Estonia	5	0	0					
Finland	49	1	0					
France	783	4	0					
Germany	430	6	1	22 C h 2005				
Greece	8	0	0	23.6 hours				
Hungary	3	0	0					

Ireland	27	0	0					
Italy	486	3	0					
Latvia	3	0	0					
Lithuania	4	1	0					
Luxembourg	33	0	0	]				
Malta	3	0	0	]				
Netherlands	828	18	1					
Poland	48	2	0					
Portugal	49	2	0					
Romania	67	1	0					
Slovakia	9	0	0					
Slovenia	6	0	0					
Spain	226	1	0					
Sweden	77	1	0					
Iceland	-	-	-	-				
Liechtenstein	-	-	1	-				
Norway	-	-	1	-				
Total EU	3,443	46	3	23.6 hours				
Total EEA	-	-	-	-				
Measure 18.3	LinkedIn				Bing Search			
QRE 18.3.1	Through the acquisition of Miburo in July 2022, Microsoft now has an internal research team—the Digital Threat Analysis Center (DTAC)—that conducts research on information influence			conducts user s	studies as part of its provely partnered with M	siders safe design practices duct and new feature develo icrosoft Research and thir	pment processes. d-party research	
	operations and publishes both internal and public reports on its findings.			disinformation.		esearch concerning safe des		
	Additionally, Mi organisations, the and the Alliance research that the	e Global Disinfor for Securing D	mation Index, a emocracy to i	nd NewsGuard, ngest data and	that turn up lit	tle to no results, especial potential for such data	earch into "data voids" – sear ally where a query is obscure voids to be exploited by bad ated content. Bing's leading	e or not searched actors seeking to

Bing and LinkedIn. Microsoft also currently funds and works with Carnegie Foundation and Princeton University on the creation of hub for researchers to access data from social media companies to improve the identification and tracking of information operations.

voids partnered with Data & Society, an independent nonprofit research organisation, to publish a comprehensive 2019 report, "DATA VOIDS: Where Missing Data Can Easily Be Exploited", to examine how data voids are leveraged by manipulators seeking to expose people to problematic content including falsehoods, misinformation, and disinformation. The report has become a foundational source of research into the emergence of data voids, and Bing continues to explore opportunities for future research in this important space.

Through the acquisition of Miburo in July 2022, Microsoft now has an internal research team—the Digital Threat Analysis Center (DTAC)—that conducts research on information influence operations and publishes both internal and public reports on its findings. Additionally, Microsoft funds and works with external organisations, the Global Disinformation Index, NewsGuard, and the Alliance for Securing Democracy, to ingest data and research that they conduct into Microsoft products, including Bing Search and LinkedIn. Microsoft also currently funds and works with Carnegie Foundation and Princeton University on the creation of hub for researchers to access data from social media companies to improve the identification and tracking of information operations.

Bing Search looks forward to continued opportunities to contribute to and collaborate with the research community on future research.

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

## Commitment 19

Relevant Signatories using recommender systems commit to make them transparent to the recipients regarding the main criteria and parameters used for prioritising or deprioritising information, and provide options to users about recommender systems, and make available information on those options.

	C.19	M 19.1	M 19.2
We signed up to the	LinkedIn	LinkedIn	LinkedIn
following measures of	Bing Search	Bing Search	Bing Search
this commitment:			
	LinkedIn		Bing Search
In line with this	Yes		No
commitment, did you			
deploy new			
implementation			
measures (e.g.			
changes to your			
terms of service, new			
tools, new policies,			
etc)? [Yes/No]			
If yes, list these	New Implementa		New Implementation Measures
implementation	- <u>Publicat</u>	tion of revised information on recommender	
measures here .	systems		Not applicable
	- Include	d link to above information in <u>LinkedIn User</u>	
	<u>Agreem</u>	<u>ient</u>	
Do you plan to put	No		No
further			
implementation			
measures in place in			

the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]  If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures  Not applicable	Planned Implementation Measures  Not applicable
Measure 19.1	LinkedIn	Bing Search
QRE 19.1.1	Prior to the reporting period, LinkedIn published a variety of articles to explain to users how our recommender systems work, including: "Mythbusting the Feed: How the Algorithm Works"; "Mythbusting the Feed: Helping our members better understand LinkedIn"; "Keeping your feed relevant and productive"; LinkedIn Safety Series: Using Al to Protect Member Data; "Guide: Features to Help You Control Your Feed and Conversations"; Our approach to building transparent and explainable Al systems. During the reporting period LinkedIn collated and expanded upon existing resources to further explain the main parameters of LinkedIn recommender systems and options provided to users to influence and control these recommender systems.  Prior to the reporting period, LinkedIn addressed automated processing and relevancy in the LinkedIn User Agreement.  During the reporting period, LinkedIn added a link to the above referenced Help Centre article, to the end of Section 3.6 of the LinkedIn User Agreement.	While not a recommender system, the main parameters of Bing Search's ranking algorithms are published in the How Bing Ranks your Content section of the Microsoft Bing Webmaster Guidelines. Please also see QRES 18.3.1, 14.1.1., and 22.2.1. The Microsoft Bing Webmaster Guidelines are available to Bing Search users in the EU.

Measure 19.2	LinkedIn		Bing Search	
SLI 19.2.1 – user settings	Members that do not wish to have their LinkedIn feed experience sorted by relevance can elect to have their LinkedIn feed sorted chronologically using the "Sort by" functionality above the feed.  The table below reports: (1) the number of EU members who used the feed "Sort by" functionality between 1 - 31 December 2022; and (2) the number of times those members used the feed "Sort by" functionality between 1 - 31 December 2022. The metrics are assigned to EU Member State based on the self-reported profile location of the member.		shown below ("AS/RS Setting"):  Search suggestions  Users may also access, view, and dele Account Privacy dashboard or clear the Users who are Microsoft Account user Ad interests through the Maccount.microsoft.com/privacy/ad-settusers that have globally added or remove	earch suggestions in its user setting page, as  See search suggestions as you type  te previous search queries in their Microsoft eir search history in Bing Search settings.  s may also add or remove a topic from their licrosoft Account Settings page at tings ("Ad Interest"). Figures on the amount of oved Ad Interests are below. This information tate level and therefore the below Ad Interest
	The number of EU members who used the feed "Sort by" functionality between 1 - 31 December 2022	The number of times the members used the functionality between 1 - 31 December 2022	No of times users actively engaged with these settings  AS/RS Setting	No of times users actively engaged with these settings  Ad Interest
Member States			A3/N3 Setting	Au interest
Austria	3,694	17,086	0	-
Belgium	8,716	44,119	1	-
Bulgaria	1,037	5,354	0	-
Croatia	897	5,233	0	-
Cyprus	2,529	12,743	0	-

Czech Republic	7,882	41,477	0	-
Denmark	525	2,853	0	-
Estonia	6,701	37,197	0	-
Finland	47,205	229,827	0	-
France	38,684	185,637	0	-
Germany	2,591	14,654	2	-
Greece	1,208	5,466	0	-
Hungary	5,384	25,365	0	-
Ireland	17,667	87,517	0	-
Italy	478	2,510	1	-
Latvia	890	4,899	0	-
Lithuania	802	4,632	0	-
Luxembourg	331	1,778	0	-
Malta	33,569	174,757	0	-
Netherlands	10,914	56,720	0	-
Poland	6,432	31,365	0	-
Portugal	458	2,460	0	-
Romania	1,664	8,780	0	-
Slovakia	715	3,331	0	-
Slovenia	553	2,643	0	-
Spain	21,591	102,442	1	-
Sweden	8,914	42,053	0	-
Iceland	-	-	0	-
Liechtenstein	-	-	0	-
Norway	-	-	0	-
Total EU	232,031	1,152,898	5	-
Total EEA	-	-	5	-
Total Global			N/A	76,192

## **V. Empowering Users**

# Commitment 20

Relevant Signatories commit to empower users with tools to assess the provenance and edit history or authenticity or accuracy of digital content.

	C.20	M 20.1	M 20.2	
We signed up to the	LinkedIn	LinkedIn	LinkedIn	
following measures of	Bing Search	Bing Search	Bing Search	
this commitment:				
	LinkedIn		Bing Search	
In line with this	No		No	
commitment, did you				
deploy new				
implementation				
measures (e.g. changes				
to your terms of				
service, new tools, new				
policies, etc)? [Yes/No]				
If yes, list these	New Implementat	ion Measures	New Implementation Measures	
implementation				
measures here .	Not applicable		Not applicable	
Do you plan to put	No		No	
further implementation				
measures in place in				
the next 6 months to				
substantially improve				
the maturity of the				
implementation of this				
commitment? [Yes/No]				

If yes, which further	Planned Implementation Measures	Planned Implementation Measures
implementation measures do you plan to put in place in the next 6 months?	Not applicable	None. Nonetheless, Bing Search will continue to evaluate additional measures or partnerships relevant to this Commitment.
Measure 20.1	LinkedIn	Bing Search
QRE 20.1.1	Microsoft is a founding and active member of the Coalition for Content Provenance and Authenticity (C2PA), and is currently a cochair. In January 2022, the C2PA released version 1.0 of its technical specification for digital provenance.	Microsoft is a founding and active member of the Coalition for Content Provenance and Authenticity (C2PA), and is currently a co-chair. In January 2022, the C2PA released version 1.0 of its technical specification for digital provenance.
	Microsoft is also partnering with TruePic to develop a prototype provenance mobile application. This prototype application will provide a proof of concept for safe, flexible, and easy to use capture, storage and viewing of authenticated visual media anywhere in the world.	Microsoft is also partnering with TruePic to develop a prototype provenance mobile application. This prototype application will provide a proof of concept for safe, flexible, and easy to use capture, storage and viewing of authenticated visual media anywhere in the world.
	Further, Microsoft has partnered with NewsGuard to provide a free plug-in for the Microsoft Edge web browser (also available for other browsers including Chrome and Firefox), as well as an opt-in news rating feature for the Edge mobile application on both iOS and Android. This empowers Edge users to benefit from the comprehensive analysis done by NewsGuard and to better identify the most reliable news and information sites. LinkedIn users are also able to benefit from NewsGuard via this plug in. This plug-in enables LinkedIn users to benefit from NewsGuard's reliability rating, where available, when browsing news posts from news and information sites	Microsoft and key members of the Bing Search team are also involved in the Partnership on AI ("PAI") to identify possible countermeasures against deepfakes and has participated in the drafting and refinement of PAI's proposed Synthetic Media Code of Conduct. The proposed Code of Conduct provides guidelines for the ethical and responsible development, creation, and sharing of synthetic media (such as AI-generated artwork).

Measure 20.2	LinkedIn	Bing Search
QRE 20.2.1	Microsoft is a founding member of the Coalition for Content	Microsoft is a founding member of the Coalition for Content Provenance
•	Provenance and Authenticity (C2PA). The C2PA Coalition aims to	and Authenticity (C2PA), and Bing Search leadership regularly participates
	address the prevalence of disinformation, misinformation, and online	in discussions related to the development of provenance tools. The C2PA
	content fraud through developing technical standards for certifying	Coalition aims to address the prevalence of disinformation, misinformation,
	the source and history or provenance of media content.	and online content fraud through developing technical standards for
		certifying the source and history or provenance of media content.
	Standards are still in development, as member organisations work	
	together to develop content provenance specifications for common	Standards are still in development, as member organisations work together
	asset types and formats to enable publishers, creators, and	to develop content provenance specifications for common asset types and
	consumers to trace the origin and evolution of a piece of media,	formats to enable publishers, creators, and consumers to trace the origin
	including images, videos, audio, and documents. These technical	and evolution of a piece of media, including images, videos, audio, and
	specifications will include defining what information is associated	documents. These technical specifications will include defining what
	with each type of asset, how that information is presented and stored,	information is associated with each type of asset, how that information is
	and how evidence of tampering can be identified.	presented and stored, and how evidence of tampering can be identified.
		Bing Search is continuing to evaluate possible standards and provenance
	Microsoft has also developed Project Origin, which aims to create a	tools that may be feasible for search engines.
	measure of accountability for media to reduce the spread of	
	disinformation through synthetic media. This technology helps certify	Microsoft has also developed Project Origin, which aims to create a
	the source of the content, like a watermark, which will expose if	measure of accountability for media to reduce the spread of disinformation
	alterations have been made which can lead to manipulation and	through synthetic media. This technology helps certify the source of the
	disinformation.	content, like a watermark, which will expose if alterations have been made
	- Project Origin gives publishers and consumers a tool to	which can lead to manipulation and disinformation.
	identify when media has been altered from the original	- Project Origin gives publishers and consumers a tool to identify
	source	when media has been altered from the original source
	- While it is ultimately up to viewers to believe in the accuracy	- While it is ultimately up to viewers to believe in the accuracy or
	or truth of a publisher, knowing if media has been tampered	truth of a publisher, knowing if media has been tampered with
	with gives us more power to determine what we can trust	gives us more power to determine what we can trust
	- As part of the publication process, tools will register media	- As part of the publication process, tools will register media items
	items by creating a digital fingerprint	by creating a digital fingerprint o In return, content creator will

- In return, content creator will receive a certification of authentication, which will be stored in a tamper-proof distributed ledger with no single controlling entity
- The certification can be embedded into a piece of media before distribution

When a user consumes a piece of media, the web browser or dedicated application will automatically compare the embedded digital fingerprint of the file being viewed with the original stored in the distributed ledger. Based on that comparison, it will display a clear indicator of authentication, allowing users to understand if what they are viewing is as published or has been tampered with.

- receive a certification of authentication, which will be stored in a tamper-proof distributed ledger with no single controlling entity
- The certification can be embedded into a piece of media before distribution

When a user consumes a piece of media, the web browser or dedicated application will automatically compare the embedded digital fingerprint of the file being viewed with the original stored in the distributed ledger. Based on that comparison, it will display a clear indicator of authentication, allowing users to understand if what they are viewing is as published or has been tampered with.

#### V. Empowering Users

#### Commitment 21

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

	C.21	M 21.1	M 21.2	M 21.3
We signed up to	LinkedIn	LinkedIn	LinkedIn	LinkedIn
the following measures of this commitment:	Bing Search	Bing Search		Bing Search

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

If yes, which	Planned Implementation Measures	Planned Implementation Measures
further implementation measures do you plan to put in place in the next 6 months?	Not applicable	Bing's existing programs are already designed to address these issues, but, of course, Bing regularly evaluates the efficacy of its measures and endeavours to improve and work to respond quickly to new threats or issues as they arise.
Measure 21.1	LinkedIn	Bing Search
QRE 21.1.1	As detailed above in QRE1.1.1 and 17.1.1, LinkedIn prohibits misinformation and disinformation on its platform, whether in the form of organic content or in the form of advertising content. LinkedIn's <a href="Professional Community Policies">Professional Community Policies</a> , which apply to all content on LinkedIn's platform, expressly prohibit false and misleading content, including misinformation and disinformation.	Bing Search provides tools to help users determine the reliability of content displayed in Bing search results through its "Fact Check" feature. Bing Search's Fact Check feature offers users credible ways to assess the reliability of content displayed in its search results by providing fact-check flags and warnings on certain search results and by directing users to fact-check articles.
	Where content is identified as misinformation (whether as a result of a report or proactively detected), we do not label it, rather it is removed from LinkedIn. This includes situations where LinkedIn personnel leverage the conclusions of fact checkers to determine whether the content at issue violates LinkedIn's Professional Community Policies.  Further, Microsoft has partnered with NewsGuard to provide a free plug-	ClaimReview functions as a tagging system that individual fact-checking organisations or media can use to identify their articles for search engines and social media platforms. Since 2017, Bing has ingested content from the public ClaimReview protocol made available through Schema.org and displayed fact check tags within search results for websites that have incorporated ClaimReview tags. Content tagged with a ClaimReview tag is "read" by Bing's crawlers when ingesting websites for their index and is used
	in for the Microsoft Edge web browser (also available for other browsers including Chrome and Firefox), as well as an opt-in news rating feature for the Edge mobile application on both iOS and Android. This empowers Edge users to benefit from the comprehensive analysis done by NewsGuard and to better identify the most reliable news and information	by Bing Search to help promote and/or highlight fact-checked content in search results. See additional information at Bing adds Fact Check label in SERP to support the ClaimReview markup   Webmaster Blog. Bing also pulls ClaimReview and fact check data feeds from the from DataCommons.org.
	sites. LinkedIn users are also able to benefit from NewsGuard via this plug in. This plug-in enables LinkedIn users to benefit from NewsGuard's reliability rating, where available, when browsing news posts from news and information sites rated by NewsGuard.	For example, the top result when searching for "COVID-19 vaccine sudden deaths Germany" provides a fact checked result with an "Unfounded" label to indicate to users that a viral story alleging that Covid-19 vaccines caused

	Please also see our response to QRE 17.1.1 which details how our internal team of experienced news editors provides trustworthy news about current events from verified sources and other steps we take to tackle disinformation.	an increase in "sudden deaths" in Germany by four times was deemed unfounded by a fact-checking organisation.  Fact Check: COVID Shots Have NOT Increased 'Sudden Deaths https://leadstories.com/hoax-alert/2022/12/fact  Claim: COVID-19 vaccine rollouts increased \"sudden deaths\" in Germany by four times.  Unfounded Fact checked by leadstories.com  For more information on other media literacy tools in Bing Search, please see QRE 17.1.1.
	Methodology of data measurement	Methodology of data measurement
	As detailed in our response to 21.1.1, LinkedIn removes content that violates our Professional Community Policies (including misinformation) and does not deploy labelling or warning systems.  Accordingly, the metrics for this SLI for the period 1 - 31 December 2022 are zero.	Bing Search uses the open schema.org ClaimReview protocol, and fact check articles incorporating ClaimReview tags are ingested in the Bing index. Bing cannot feasibly assess the location of the website or its operator for the purposes of this metric. Therefore, when calculating the location of fact checked content for the purposes of SLI, Bing has compiled the data as follows:
SLI 21.1.1 - actions taken under measure 21.1		Fact Check URLs ("FCURL") – This represents the number of distinct URLs containing a ClaimReview tag (i.e. fact-check content) that appeared on the first page of Bing search results for any number of users located in the EU member states.  Fact Check Impressions ("FCI") – The number of times the abovementioned URLs appeared on the first page of Bing search results to a user located in the EU Member States.
		Bing cannot provide data on the ratio of impressions of fact-checks to original impressions of fact-checked content, as Bing ingests websites with "fact check" tags and thus there is no ratio to assess. Bing also cannot reasonably quantify the "reach" of labels or fact checks available on its search index beyond what is provided below, as the appearance of fact checks depends entirely on each user's unique search query.

	Total	Ratio of impressions	Reach of labels/	Other	Total	Ratio of impressions	Reach of labels/	Other
	impressions of	of fact-checks to	fact-checkers	pertinent	impressions of	of fact-checks to	fact-checkers and	pertinent
	fact-checks	original impressions	and other	metric	fact-checks	original impressions	other authoritative	metrics
		of fact-checked	authoritative			of fact-checked	sources	
		content	sources			content		
					FC			
					Impressions		FC URLS	
Member States	N/A	N/A	N/A	N/A		N/A		N/A
Austria					117		41	
Belgium					311		75	
Bulgaria					0		0	
Croatia					0		0	
Cyprus					0		0	
Czech Republic					0		0	
Denmark					109		37	
Estonia					0		0	
Finland					84		26	
France					615		109	
Germany					1,250		147	
Greece					0		0	
Hungary					0		0	
Ireland					256		81	
Italy					463		104	
Latvia					0		0	
Lithuania					0		0	
Luxembourg					0		0	
Malta					0		0	
Netherlands					641		104	
Poland					306		67	

Member States	0	0	0	N/A	N/A		N/A		
							or mislea	nding	
							checked a	as false	
			misleading				of, conte		
			fact-checked as false or				or user re		
	CHECKETS	articles	re-shares of, content				interactio		
	checkers	articles	interactions with, or user	CHECKEIS	Dasis Of Such	สา เป็นเรื่อ	measures		
	independent fact-	on the basis of such	measures on user	checkers	basis of such				
	published by	to content, such as	as the impact of 21.1.	by independent fac-		Nr of labels applied to content, such as on the		metrics such as	
	Nr of articles			Nr of articles publis	pplied to Meaningful		ful		
			for Bing to ingest and display fact-check tags for a website within search results. Bing cannot quantify the number of articles published by independent fact-checkers that are available on the Bing Search index. See SLI 21.1.1						
21.1		o penoa 1 - 31 Beec							
under measure	· ·	or the period 1 - 31 Dece							
actions taken		oy labelling or warning	labels to websites; rather websites must embed a ClaimReview tag in order						
SLI 21.1.2 -	· ·	onse to QRE 21.1.1, Link ional Community Policies	Metrics concerning "user interactions" and "labelling of content" are not applicable to Bing, as it is a search engine. Bing does not apply fact check						
	Methodology of data		Methodology of data measurement						
Total EEA		-		9,911		1,090	)		
Total EU	0 0	0		9,711		1,046			
Norway				200		44			
Liechtenstein				0		0			
Iceland				0		0			
Sweden				334		84			
Spain				517		105			
Slovenia				0		0			
Slovakia				0		0			
Romania				1		1			
Portugal				4,707		65			

Measure 21.2	LinkedIn	This Measure is not relevant or pertinent to Bing Search as it does not host the content and cannot assess the extent to which content or indexed landing pages has reached its users.
QRE 21.2.1	LinkedIn has to date not undertaken and/or supported separate research and testing on the potential efficacy of warnings or updates targeted to users that have interacted with content that was later actioned upon for violation of our Professional Community Policies.  Given LinkedIn currently removes, rather than labels, content that violates our Professional Community Policies, LinkedIn may be unable to provide meaningful context to users as to the specific content that they had viewed which was later actioned.	Not applicable
	To the extent others have conducted such research and/or testing, we are happy to discuss findings within the relevant Task-force Subgroups in view of identifying relevant follow-up actions.	Direc Counts
Measure 21.3	LinkedIn	Bing Search
QRE 21.3.1	As detailed in response to QRE 21.1.1, LinkedIn removes content that violates our Professional Community Policies (including misinformation) and does not deploy labelling or warning systems.	Bing Search regularly consults research and evidence, including from internal Microsoft research and data science teams, related to safe design practices, labeling, and user experience and considers such research as part of its product design and testing. Bing also conducts internal research and user studies for product features, such as by analysing impressions, engagement, or clicks of various features. Bing also has a "feedback" button easily accessible from any page of Bing. Bing reviews and may make improvements based on user feedback.  As to fact check labels in particular, Bing participated in the W3C organisation that helped to design and promote Schema.org and ClaimReview, and regularly meets with stakeholders to discuss common issues, including whether updates to these common schema are necessary.

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

#### Commitment 22

Relevant Signatories commit to provide users with tools to help them make more informed decisions when they encounter online information that may be false or misleading, and to facilitate user access to tools and information to assess the trustworthiness of information sources, such as indicators of trustworthiness for informed online navigation, particularly relating to societal issues or debates of general interest.

	C.22	M 22.1	M 22.2	M 22.3	M 22.4	M 22.5	M 22.6	M 22.7
We signed up to the	LinkedIn	LinkedIn	LinkedIn	LinkedIn				LinkedIn
following measures of			<b>Bing Search</b>	<b>Bing Search</b>				<b>Bing Search</b>
this commitment:								
	LinkedIn	<u>.</u>	<u>.</u>		Bing Search			
In line with this	Yes				Vo			
commitment, did you								
deploy new								
implementation								
measures (e.g.								
changes to your terms								
of service, new tools,								
new policies, etc)?								
[Yes/No]								
If yes, list these	New Implemen	tation Measures		1	New Implementation	n Measures		
implementation								
measures here .	We introduced	the "About this prof	ile tool"	1	Bing Search's existin	g programs are a	Iready designed t	o address these issues,
				1	out, of course, Bing	Search regularly	y evaluates the e	fficacy of its measures
					endeavors to improv	e and work to re	spond quickly to r	new threats or issues as
				1	they arise.			

Do you plan to put	No	No
further		
implementation		
measures in place in		
the next 6 months to		
substantially improve		
the maturity of the		
implementation of		
this commitment?		
[Yes/No]		
If yes, which further	Planned Implementation Measures	Planned Implementation Measures
implementation		
measures do you plan	Not applicable	Bing's existing programs are already designed to address these issues, but, of
to put in place in the		course, Bing regularly evaluates the efficacy of its measures and endeavors to
next 6 months?		improve and work to respond quickly to new threats or issues as they arise.
Measure 22.1	LinkedIn	This Measure is not relevant or pertinent to Bing Search as it does not allow users to share content. However, Bing will, where appropriate, provide users with information on the availability of credibility extensions for the Microsoft Edge browser, such as the extension currently offered by NewsGuard, and provide, in appropriate cases, links to access those extensions. Bing will continue to explore whether and how other indicators of trustworthiness may be useful to users in the context of search.
QRE 22.1.1	Microsoft has partnered with NewsGuard to provide a free plug-in for the Microsoft Edge web browser (also available for other browsers including Chrome and Firefox), as well as an opt-in news rating feature for the Edge mobile application on both iOS and Android. This empowers Edge users to benefit from the comprehensive analysis done by NewsGuard and to better identify the most reliable news and information sites. LinkedIn users are also able to benefit from NewsGuard via this plug in. This plug-in enables LinkedIn users	Not applicable, as this Measure is not relevant or pertinent to Bing Search as it does not allow users to share content.

	browsing nous pasts from nous and information sites and by					
	browsing news posts from news and information sites rated by					
	NewsGuard.					
	Further, in October 2022, LinkedIn <u>announced</u> the introduction of a					
	new "About this profile" feature that will show users when a profile					
	was created and last updated, along with whether the member has					
	verified a phone number and/or work email associated with their					
	account. The introduction of this feature is part of our ongoing					
	commitment to keep LinkedIn a trusted professional community,					
	through which we are (1) rolling out new features and systems to help					
	members make more informed decisions about members with whom					
	they interact, and (2) enhancing our automated systems that keep					
	inauthentic profiles and activity off our platform. Whether a member					
	is deciding to accept an invitation, learning more about a business					
	opportunity, or exchanging contact information, we want them to be					
	empowered to make decisions using additional signals about the					
	authenticity of accounts.					
	Methodology of data measurement	Methodology of data measurement				
	The table below reports metrics concerning EU member use of the	Not applicable.				
SLI 22.1.1 - actions	"About this profile" feature described above in QRE 22.1.1. The					
enforcing policies	metrics include: (1) the number of members who used the "About					
above	this profile" feature between 1 - 31 December 2022; and (2) the					
	aggregate number of times those members used the feature					
	between 1 - 31 December 2022. The metrics are assigned to EU					
	Member State based on the self-reported profile location of the					
	member.					
	Percentage of users that have	Percentage of users that have enabled the trustworthiness indicator				
	enabled the trustworthiness					
	indicator					

	The number of members who	The aggregate number of times
	used the "About this profile"	those members used the feature
	feature between 1 - 31	between December 1 - 31
	December 2022	December 2022
Member States		
Austria	5,095	6,267
Belgium	11,249	13,444
Bulgaria	2,235	2,905
Croatia	1,642	2,054
Cyprus	4,232	5,142
Czech Republic	7,498	8,513
Denmark	686	872
Estonia	3,533	4,310
Finland	81,929	99,639
France	48,102	57,765
Germany	5,255	6,430
Greece	2,377	2,907
Hungary	5,721	6,968
Ireland	43,204	53,157
Italy	816	1,126
Latvia	1,782	2,124
Lithuania	1,252	1,534
Luxembourg	757	968
Malta	33,332	39,654
Netherlands	18,785	23,049
Poland	13,729	16,980
Portugal	1,123	1,379
Romania	6,455	8,114
Slovakia	1,158	1,391
Slovenia	682	814
Spain	33,530	41,271
Sweden	12,194	14,438

Iceland		
Liechtenstein		
Norway		
Total EU	348,353 423,215	
Total EEA		
Measure 22.2	LinkedIn	Bing Search
QRE 22.2.1	situations, (e.g., Covid-19 or Ukraine), we will use search banners to point members to reputable sources of information (e.g., when members searched for COVID, we pointed members to "trusted storylines" where we provided trustworthy information about those topics, including links to global health organisations) (please also see QRE 17.1.1).  Linkedln's focus, in addition to pointing members to trustworthy content, has been to prohibit members from sharing harmful content on the platform. As a real identity online professional networking platform, content posted by members is seen by that member's colleagues, employer, and potential business partners. Consequently, members do not tend to post reputationally harmful content like misinformation, and such content does not gain traction on LinkedIn for the same reasons. Nonetheless, misinformation is removed from	While Bing Search is not a recommender system, the section "How Bing Ranks Your Content" in the Microsoft Bing Webmaster Guidelines details the parameters Bing uses in its ranking algorithms and provides an overview of how Bing works to ensure that its ranking algorithms can determine the trustworthiness of a given website and rank that the website accordingly. Specifically, Bing's search algorithm prioritises the quality and credibility of a website, which leads to the demotion of low-authority websites and promotion of trustworthy media sources. Bing's evaluation of quality and credibility includes an evaluation of the page's authoritativeness, which is based on factors such as the author's or site's reputation, the level of discourse (for example, an article with citations and references to data sources is considered higher quality than one that does not explain or cite its data sources); the completeness of the content; the transparency of authorship, and nature of the content (e.g., pages that call for violence, name-calling, offensive statements, or use derogatory language to make a point are generally treated as low quality). Bing Search utilises a variety of signals – including trustworthiness indicators from trusted third parties such as NewsGuard – as one of several means to help determine the authority score of a given website and rank it accordingly in search results.  Bing Search also relies upon trustworthiness signals to help ensure that its recommender systems, such as auto-suggest and related search, direct users to high authority, trustworthy results and do not inadvertently suggest problematic or misleading content.

Measure 22.3	LinkedIn	Bing Search
Wedsure 22.3		The above-mentioned policies and measures are available to EU users through the Microsoft Bing Webmaster Guidelines.
QRE 22.3.1	Further, we are planning to extend the language coverage in accordance with the Digital Services Act.  LinkedIn seeks to reflect the best version of professional life through a community where we treat each other with respect and help one	
	another succeed.  The Professional Community Policies have three main elements: (1) Be Safe, (2) Be Trustworthy and (3) Be Professional. Additionally, the Professional Community Policies set out how members can report content that may violate our policies and that a violation of our Professional Community Policies can result in action taken against that member's account or content.	
	(1) Be Safe: do not post harassing content; do not threaten, incite, or promote violence; do not share material depicting the exploitation of children; do not promote, sell or attempt to purchase illegal or dangerous goods or services; do not	

	share content promoting dangerous organisations or individuals.  (2) Be Trustworthy: do not share false or misleading content; do
	not create a fake profile or falsify information about yourself; do not scam, defraud, deceive others.  (3) Be Professional: do not be hateful, do not engage in sexual
	innuendos or unwanted advances; do not share harmful or shocking material; do not spam members or the platform.
Measure 22.4	This measure is aimed specifically at "providers of trustworthiness indicators" indicators" and is therefore not relevant or pertinent to Microsoft and its services.  This measure is aimed specifically at "providers of trustworthiness indicators" and is therefore not relevant or pertinent to Microsoft and its services.
Measure 22.5	This measure is aimed specifically at "providers of trustworthiness indicators" indicators" and is therefore not relevant or pertinent to Microsoft and its services.  This measure is aimed specifically at "providers of trustworthiness indicators" and is therefore not relevant or pertinent to Microsoft and its services.
Measure 22.6	This measure is aimed specifically at "providers of trustworthiness indicators" indicators" and is therefore not relevant or pertinent to Microsoft and its services.  This measure is aimed specifically at "providers of trustworthiness indicators" and is therefore not relevant or pertinent to Microsoft and its services.
Measure 22.7	LinkedIn Bing Search
QRE 22.7.1	As the world around us changes, LinkedIn continues to evolve and adapt our systems and practices for combating misinformation and other inauthentic behaviour on our platform, including to respond to the unique challenges presented by world events. In addition to broader measures, Bing Search has taken special care to counter low low authority information and misinformation in relation to the COVID-19 crisis and the Russian Invasion of Ukraine, as detailed below and further in the Crisis Reporting appendices.
	authority information in relation to the COVID-19 crisis and the Russian Invasion of Ukraine, as detailed below and further in the Crisis Reporting appendices. Some examples of steps we have taken to related to the conflict.
	tackle disinformation in connection with unfolding world events include the following:  - In response to the COVID-19 pandemic, <u>LinkedIn editors</u> - Bing has taken steps to algorithmically boost authority signals and has downgraded less authoritative information ( <i>see</i> SLI 22.7.1). These queries are translated automatically into other languages supported

- Promote content from most credible organisations and experts, such as the World Health Organization
- During the early years of the pandemic, any member that undertook a simple search of the term "coronavirus" was redirected to a link "Know the facts about coronavirus", which appears first in the list of search results. By clicking on this link, members are directed to LinkedIn's own official page on the coronavirus with information and broadcasts from verified sources, primarily from the World Health Organization. The storylines on this page are available in 8 languages across 54 countries.
- above 'Today's News and Views' with story lines promote reliable content for EU users: relevant to COVID-19 and including updates from the World Health Organization and Centers for Disease Control and Prevention
- LinkedIn's internal, global team of global experienced news editors also proactively provide members with curated news about current events from trusted sources in a number of languages, and its content moderation teams closely monitor associated conversations in languages including, for example, Russian, Ukrainian, German, Dutch, and French.
  - o LinkedIn's team of editors cover the most recent developments of Russia's invasion of Ukraine, ranging from the economic impact to major military events that are taking place.
  - In connection with the 2022 French elections, LinkedIn created a series of videos with the aim to

- Bing regularly partners with independent research organisations and nonprofit organisations to maintain threat intelligence and inform potential algorithmic interventions.
- Bing Search also takes action to remove autosuggest and related search terms that have been found likely to lead users to low authority content. Bing continues to partner with fact checking organisations and apply fact check labels to help users understand the context and trustworthiness of certain content in the EU.
- These measures have helped ensure that Bing Search is promoting authoritative news sources, timelines, and other factual information at the top of algorithmic search results.
- Bing has also complied with EU sanctions orders requiring the removal of certain Russian sources, such as Russia Today and Sputnik.

Launched a 'Special Report: Coronavirus' box In response to the COVID-19 pandemic, Bing introduced new methods to

- Launched a specialised COVID-19 information hub providing centralised news and country-specific data related to the pandemic, including case rates, vaccine data, and COVID-19 related news. Data can be sorted by each EU member state to provide a personalised experience.
- Reliable information can also be found near the top of search results pages and in sidebar windows.
- In general, Bing prioritises trusted, high authority news sources and has piloted algorithmic defenses ("defensive search") to help promote reliable information about COVID-19 and pandemic related information.
- Reliable health information is provided through public service announcements pointing to authoritative third-party sources of health information (e.g., the US Center For Disease Control and the World Health Organization) for certain COVID-19 queries, such as for queries

educate LinkedIn members on and off the platform seeking information about COVID-19 symptoms, an example of which about key trust topics, including how to build a is shown below. trusted community and how to personalise a ફ છુ વ LinkedIn Feed. The campaign kicked off two weeks before the first round of the Presidential election. During the election period, we also highlighted Statistics Vaccine Prevention Symptoms Treatment Testing How to Help More info how members can find trusted information, for Videos of Covid 19 symptoms Coronavirus (COVID-19) symptoms example in a LinkedIn Company page post in COVID-19 affects different people in different ways. Most infected people will develop mild to French, or in a <u>LinkedIn post</u> by our Country moderate illness and recover without hospitalization. The CDC does not list different symptoms for the Delta variant or others. Manager. Less common symptoms New test and treatments for patients with lingering COVID-19 symptoms Aches and pains Sore throat Diarrhea
 Conjunctivitis
 Headache . Loss of taste or smell a rash on skin, or discoloration of fingers or toes Serious symptoms: Difficulty breathing or shortness of breath Chest pain or pressure
 Loss of speech of movement Seek immediate medical attention if you have serious symptoms. Always call before visitin your doctor or health facility. On average it takes 5–6 days from when someone is infected with the virus for symptoms to show, however it can take up to 14 days Learn more at VWHO See results for CDC: Caring for yourself at home Methodology of data measurement Methodology of data measurement We look forward to providing reports reflecting any applicable Bing has revised the SLI action descriptions below for accuracy with respect to actions under this SLI during the next reporting period. the metrics provided pursuant to this Section. Please see key below. **SLI 22.7.1 - actions** Bing Covid-19 Information Hub: enforcing policies "Visits" reflects the total visits from unique visitors (may include above multiple visits by same user) during the Reporting Period "Users" reflects the total number of unique users that used the COVID-19 Information Hub during the Reporting Period

					Because defensive s reporting is inapplic - "Defensive addressed Ukraine/Ru - "Impressio users wher	sive Interventions" refers to the total number of queries sed with defensive search interventions related to the e/Russia crisis.  ssions" reflects the impressions for the queries searched by where defensive search interventions were applied		
	Impressions	Clicks	CTR	Shares	Visits (COVID-19 Hub)	Users (COVID-19 Hub)	Defensive Interventions (RU/UK)	Impressions (RU/UK)
Member States							(10,014	
Austria					2,490	1,774		
Belgium					749	570		
Bulgaria					2,328	1,934		
Croatia					0	0		
Cyprus					0	0		
Czech Republic					1,065	672		
Denmark					709	586		
Estonia					754	649		
Finland					5,385	4,522		
France					18,961	14,189		
Germany					40,949	24,277		
Greece					2,006	1,471		
Hungary					962	714		
Ireland					11,429	11,097		
Italy					23,943	17,586		
Latvia					971	783		
Lithuania					978	880		
Luxembourg					251	221		

Total Global			600,000	5.7M
Total EEA	248,790	188,195		
Total EU	248,452	187,910		
Norway	7	4		
Liechtenstein	0	0		
Iceland	331	281		
Sweden	21,949	18,788		
Spain	26,810	21,224		
Slovenia	1,275	1,170		
Slovakia	1,199	1,097		
Romania	25,224	15,132		
Portugal	17,406	14,482		
Poland	33,136	27,252		
Netherlands	7,523	6,840		
Malta	0	0		

## V. Empowering users

## Commitment 23

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

	C.23	M 23.1		M 23.2
We signed up to the	LinkedIn	LinkedIn		LinkedIn
following measures of	Bing Search	Bing Search		Bing Search
this commitment:		<b>3</b>		<b>3</b>
	LinkedIn		Bing Search	
In line with this	No		No	
commitment, did you				
deploy new				
implementation				
measures (e.g. changes				
to your terms of				
service, new tools, new				
policies, etc)? [Yes/No]				
If yes, list these	New Implementation Measures		New Implementation	Measures
implementation				
measures here .	Not applicable		Not applicable	
Do you plan to put	Yes		No	
further implementation				
measures in place in				
the next 6 months to				
substantially improve				
the maturity of the				

implementation of this commitment? [Yes/No]		
If yes, which further implementation	Planned Implementation Measures	Planned Implementation Measures
measures do you plan to put in place in the next 6 months?	As part of our work to implement the Digital Services Act, we are working to introduce:  - specific reporting flows for guests and entities designated as Trusted Flaggers under which they will be able to report content which violates our Professional Community Policies, including false or misleading content.  - Additional measures and protections against misuse in accordance with Article 23 of the Digital Services Act.	Bing Search's existing programs are already designed to address these issues, but, of course, Bing regularly evaluates the efficacy of its measures and endeavours to improve and work to respond quickly to new threats or issues as they arise.
Measure 23.1	LinkedIn	Bing Search
QRE 23.1.1	If LinkedIn members locate content they believe violates our Professional Community Policies, we encourage them to report it using the in-product reporting mechanism represented by the three dots in the upper right-hand corner of the content itself on LinkedIn.	As a search engine that does not host or display user generated content, Bing does not have a reporting function for user generated content.  Bing's Report a Concern Form permits users to report third-party websites for a variety of reasons including disclosure of private information, spam
	Misinformation is specifically called out as one of the reporting options.	and malicious pages, and illegal materials.
	The reporting feature is available through, and largely identical across, LinkedIn's website and mobile app, although reporting reasons and their visual presentation may vary slightly for certain types of content. In most instances, the reporting process is located just one click away from the content being reported and, depending on whether content is reported in the LinkedIn App or on desktop, the reporting process takes between four or five clicks to complete.	Bing's "Feedback" tool, which is accessible on the lower right corner on a search results page, allows users to provide feedback on search results (including a screenshot of the results page) to Bing Search. Depending on the nature of the feedback, Bing may take appropriate action, such as to engage in algorithmic interventions to ensure high authority content appears above low authority content in search results, add answers, warnings or other media literacy interventions on certain topics, or remove autosuggest terms.
	Reported content generally is reviewed by trained content reviewers. In addition, LinkedIn uses automation to flag potentially violative	

	content to our content moderation teams. If reported or flagged content violates the Professional Community Policies, it will be removed from the platform.  When members use the above reporting process and choose to receive updates, LinkedIn communicates by email with the reporting member to confirm receipt of reports and provide updates about subsequent decisions. Members also receive notice in the event their content is removed from LinkedIn.  If members wish to appeal LinkedIn's decisions, they can request a second review and provide the reasons they believe LinkedIn's decision was not correct. To begin that appeal process, members can log into their account and follow the onscreen messaging or reply to the message they received notifying them of the content removal.	
Measure 23.2	LinkedIn	Bing Search
QRE 23.2.1	As noted in our response to QRE 23.1.1, content that is flagged as misinformation (whether reported or automatically detected) is removed from LinkedIn. LinkedIn has a quality assurance team that is dedicated to ensure the quality of our content review processes and decisions. For example, the quality assurance team performs quality checks, on a routine basis, the content moderation decisions that have previously been made. This also allows us to improve our processes and further strengthen our platform as a trusted source of information.	See QRE 23.1.1. Bing Search generally does not experience issues with mass flagging of content or abuse of its reporting features. This concern appears more applicable to other types of services (e.g., social media and online media websites) or content outside the scope of this regulation that is more prone to mass flagging, such as copyright infringement. Bing Search engages in human review of reports submitted through its reporting functionality and evaluates each report consistent with its policies and procedures.
	Furthermore, as a real identity professional network, LinkedIn acts vigilantly to maintain the integrity of all accounts and to ward off bot	

to access the Services, add or download contacts, send or redirect messages" through:

- Having a dedicated Anti-Abuse team to create the tools to enforce this prohibition
- Using automated systems detect and block automated activity
- Imposing hard limits on certain categories of activity commonly engaged in by bad actors
- Detecting whether members have installed known prohibited automation software
- Conducting manual investigation and restriction of accounts engaged in automated activity
- Partnering with the broader Microsoft organisation to develop technological solutions for detecting "deep fakes"
- Investing in and using AI to detect coordinated inauthentic activity and communities of fake accounts through similarities in their content and behaviour.

#### V. Empowering users

#### Commitment 24

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

	C.24	M 24.1			
We signed up to the	LinkedIn	LinkedIn			
following measures of					
this commitment:					
	LinkedIn		Commitment 24 is not relevant or pertinent to Bing Search as it does not		
			allow the posting of user content that would require user appeals		
In line with this	No		Choose an item.		
commitment, did you					
deploy new					
implementation					
measures (e.g. changes					
to your terms of					
service, new tools, new					
policies, etc)? [Yes/No]					
If yes, list these	New Implementation I	Measures	New Implementation Measures		
implementation					
measures here .	Not applicable		Not applicable.		
Do you plan to put	Yes		Choose an item.		
further implementation					
measures in place in					
the next 6 months to					
substantially improve					

Planned Implementation Measures	Planned Implementation Measures
As part of our work to implement the Digital Services Act, we are	Not applicable.
working to ensure that our introduce:	
- specific reporting flows for guests and entities designated as	
Trusted Flaggers under which they will be able to report	
content which violates our Professional Community Policies,	
including false or misleading content.	
- Additional measures and protections against misuse in	
accordance with Article 23 of the Digital Services Act.	
LinkedIn	Measure 24.1 is not relevant or pertinent to Bing Search as it does not
	allow the posting of user content that would require user appeals
When a post, comment, reply, or article, is reported and found to go	Not applicable
against our Professional Community Policies, we take appropriate	
actions to remove it and/or restrict accounts depending on the	
severity of violation.	
The author whose content we've actioned will receive an email	
notifying them that their content does not comply with our policies. If	
the author believes LinkedIn has made a mistake in actioning their	
content, the author can ask LinkedIn to take a second look. To begin	
that appeal process, members can log into their account and follow	
the onscreen messaging or reply to the message they received	
notifying them of the content removal.	
Appeals made by members are treated the same regardless of	
whather they use LinkedIn's promium services. After our review is	
whether they use Linkedin's premium services. After our review is	
	As part of our work to implement the Digital Services Act, we are working to ensure that our introduce:  - specific reporting flows for guests and entities designated as Trusted Flaggers under which they will be able to report content which violates our Professional Community Policies, including false or misleading content.  - Additional measures and protections against misuse in accordance with Article 23 of the Digital Services Act.  LinkedIn  When a post, comment, reply, or article, is reported and found to go against our Professional Community Policies, we take appropriate actions to remove it and/or restrict accounts depending on the severity of violation.  The author whose content we've actioned will receive an email notifying them that their content does not comply with our policies. If the author believes LinkedIn has made a mistake in actioning their content, the author can ask LinkedIn to take a second look. To begin that appeal process, members can log into their account and follow the onscreen messaging or reply to the message they received notifying them of the content removal.

	<ul> <li>If your post doesn't go against our Professional Community Policies, we'll make it available on LinkedIn.</li> <li>If we find that your post does go against our Professional Community Policies, only you will be able to access your post.</li> <li>LinkedIn currently supports 25 languages, including the following official EU and EEA languages: English, Czech, Danish, Dutch, French, German, Italian, Norwegian, Polish, Portuguese, Romanian, Spanish and Swedish and our reporting flows and appeals systems are available in each of these languages.</li> </ul>							
SLI 24.1.1 - enforcement actions	Methodology of data measurement  The table below reports metrics concerning content LinkedIn removed from its platform as Misinformation, pursuant to the policy outlined in QRE 18.2.1. The metrics include:  - (1) the number of pieces of content removed as Misinformation between 1 - 31 December 2022, broken out by EU Member State;  - (2) the number of those content removals that were appealed by the content author;  - (3) the number of those appeals that were granted:				Methodology of o	data measurement		
	Nr of enforcement actions  The number of pieces of content	Nr of actions appealed	Metrics on results of appeals	Metrics on the duration and effectiveness of the appeal process	Nr of enforcement actions	Nr of actions appealed	Metrics on results of appeals	Metrics on the duration and effectiveness of the appeal process

	removed as	The number of		The median		
	Misinformation	removals that		time from		
	between 1 - 31	were appealed	The number of	appeal to		
	December	by the content	appeals that	appeal		
	2022	author	were granted	decision		
Member States			3			
Austria	45	1	0			
Belgium	89	0	0			
Bulgaria	19	0	0			
Croatia	13	0	0	-		
Cyprus	5	0	0	-		
Czech Republic	36	3	1			
Denmark	92	2	0			
Estonia	5	0	0			
Finland	49	1	0			
France	783	4	0			
Germany	430	6	1			
Greece	8	0	0			
Hungary	3	0	0			
Ireland	27	0	0			
Italy	486	3	0			
Latvia	3	0	0			
Lithuania	4	1	0			
Luxembourg	33	0	0	23.6 hours		
Malta	3	0	0			
Netherlands	828	18	1			
Poland	48	2	0			
Portugal	49	2	0			
Romania	67	1	0			
Slovakia	9	0	0			
Slovenia	6	0	0			

Spain	226	1	0			
Sweden	77	1	0			
Iceland	-	-	-	-		
Liechtenstein	-	-	-	-		
Norway	-	-	-	-		
Total EU	3,443	46	3	23.6 hours		
Total EEA	-	-	-	-		

#### V. Empowering users

#### Commitment 25

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

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

# VI. Empowering the Research Community Commitments 26 - 29

#### VI. Empowering the research community

#### Commitment 26

Relevant Signatories commit to provide access, wherever safe and practicable, to continuous, real-time or near real-time, searchable stable access to non-personal data and anonymised, aggregated, or manifestly-made public data for research purposes on Disinformation through automated means such as

APIs or other open and accessible technical solutions allowing the analysis of said data.

	C.26	M 26.1	M 26.2	M 26.3	
We signed up	LinkedIn	LinkedIn	LinkedIn	LinkedIn	
to the	Bing Search	Bing Search	Bing Search	Bing Search	
following					
measures of					
this					
commitment:					
	LinkedIn		Bing Search	•	
In line with this	No		No		
commitment,					
did you deploy					
new					
implementatio					
n measures					
(e.g. changes					
to your terms					
of service, new					
tools, new					

policies, etc)?		
[Yes/No]		
If yes, list these	New Implementation Measures	New Implementation Measures
implementatio		
n measures	Not applicable	Not Applicable. Data was previously made available before this Code was
here .		implemented
Do you plan to	No	Yes
put further		
implementatio		
n measures in		
place in the		
next 6 months		
to substantially		
improve the		
maturity of the		
implementatio		
n of this		
commitment?		
[Yes/No]		
If yes, which	Planned Implementation Measures	Planned Implementation Measures
further		
implementatio	Not applicable	Bing Search and Microsoft are evaluating possible means to track usage and
n measures do		uptake of its many publicly accessible researcher tools and datasets, as it has
you plan to put		regularly released datasets and other resources to the research community
in place in the		through the below means prior to the implementation of this Code. Bing
next 6 months?		Search hopes to provide additional metrics for this Commitment in its next report.

Measure 26.1	LinkedIn	Bing Search
QRE 26.1.1	LinkedIn is dedicated to supporting the research community and regularly provides information and data to the research community in a variety of ways.	Bing Search and Microsoft are dedicated to supporting the research community and regularly provide information and data to the research community in a variety of ways.
	To date, the non-personal, aggregated data that LinkedIn has made publicly available (data on gender equity in the workplace, data on green skills and jobs, data on industry and job skills, and data on engagement with labor markets and employment trends) has been with the goal of enabling researchers to understand the rapidly changing world of work through access to and use of LinkedIn data. However, such tools and processes could be leveraged to make data sets pertinent to undertaking research on Disinformation available and LinkedIn is investigating what data sets may be relevant. Because these data sets are publicly available, the extent to which such data has been used for disinformation related research purposes cannot easily be ascertained.  Additionally, LinkedIn provides API access for data relating to, among other things, content creation and engagement, marketing and sales use cases, talent use cases, learning use cases. Such APIs could be used for disinformation related research purposes, but to date, we have not received requests for access for such use cases. Information about the	Bing Search provides researchers and the public with access to MS MARCO, a collection of datasets focused on deep learning in search that are derived from Bing queries and related data. Research organisations can gain access to the MS MARCO datasets instantaneously via the MS MARCO homepage. The MS MARCO dataset has been cited in over 1400 research papers since its release and has been utilised for a range of research issues. Because the dataset is provided open source, the extent to which it has been used for disinformation related research purposes cannot easily be ascertained. However, the dataset has been cited in various academic papers concerning misinformation and disinformation, including:  - Generating Fact Checking Briefs - Facebook AI Research, University College London LORIA, and University of Cambridge  - H2oloo at TREC 2020: When all you got is a hammer Deep Learning. Health Misinformation, and Precision Medicine - University of Waterloo.  - Detecting fake news using Natural Language Processing - Politecnico di Torino
	LinkedIn APIs are available to the public and access is provided to approved developers.	Bing Search also provides researchers with access to ORCAS: Open Resource for Click Analysis in Search   msmarco (microsoft.github.io), a click-based dataset associated with the TREC Deep Learning Track, which provides 18 million connections to 10 million distinct queries.  In 2020, Bing Search also shared a search dataset for Coronavirus Intent comprised of queries from all over the world that had an intent related to the Coronavirus or Covid-19 (e.g., searches for "Coronavirus updates Seattle" or

"Shelter in place") for use by researchers and the public. This data, which is divisible by country, is particularly relevant to misinformation research on public health issues and the COVID-19 pandemic, as it provides insights into how users sought information related to the coronavirus during the pandemic. The dataset was also posted to <u>Azure Open datasets</u> for Machine Learning, <u>Tensorflow.org</u> and <u>Kaggle.</u> See additional information on the dataset at <u>Extracting Covid-19 insights from Bing Search data | Bing Search Blog.</u> This dataset has already been used by the disinformation research community. For example, Researchers at Aalborg University used the dataset as part of their research paper "'<u>Does Vinegar Kill Coronavirus?' - Using Search Log Analysis to Estimate the Extent of COVID-19-Related Misinformation Searching Behaviour in the United States ". The Aalborg University study used Bing search log analysis to investigate the extent and characteristics of misinformation seeking behaviour in the US.</u>

Additionally, researchers who are registered webmasters may utilise Bing's <u>Keyword Tools</u> and <u>Backlinks</u> Webmaster Tools to provide insights into search usage and keywords.

Bing Search also offers use of <u>Bing APIs</u> to the public, which include services such as Bing Image Search, Bing News Search, Bing Web Search. Bing Search provides free access to these APIs for up to 1,000 transactions per month, which may be leveraged by the research community. Bing News Search API, for example, has been used in connection with research on disinformation in a 2022 research paper, "A <u>Proposal to Find Fake News and Detecting Political Bias of News Articles"</u> published in <u>Advances in Data and Information Sciences</u>, a collection of peer-reviewed research papers presented at the 3rd International Conference on Data and Information Sciences.

In addition to the above datasets, Microsoft Research maintains a public portal of codes, APIs, software development kits, and datasets that are available to the Research Community at Researcher tools: code & datasets - Microsoft

				(msropendata.com), a data have created and publis datasets derived from Bing by researchers and downlogin credentials.  Lastly, given the open na search results, researcher	ta repository of datasets to shed in conjunction with g Search). These public reso oaded instantaneously with ature of the Bing Search is can utilise Bing to run so ia which may require priva	hat research Open Data hat researchers at Microsoft he their research (including search tools can be accessed thout formal applications or index and public nature of specific queries and analyse ate accounts or connections
QRE 26.1.2	LinkedIn will publish information as it continues to build further data research infrastructure pertinent to these commitments.			Bing Search will publish research infrastructure pe		nues to build further data nents.
	Methodology of data m	neasurement		Methodology of data measurement		
SLI 26.1.1 - uptake of the tools and processes	LinkedIn will publish information as it continues to build further data research infrastructure pertinent to these commitments.			predate this Code and mechanisms, Microsoft is	d were provided open working on developing a ole researcher tools and o	ts discussed in QRE 26.1.2 source without tracking adequate usage tracking for datasets. Bing Search hopes in its first full report.
described in Measure 26.1	Nr of users of public	Other quantitative	Other quantitative	Nr of users of public	Other quantitative	Other quantitative
	access	information on public	information on public access	access	information on public	information on public
		access	- public access	-	access	access
Measure 26.2	LinkedIn			Bing Search		
QRE 26.2.1	See QRE 26.1.1			See QRE 26.1.1.		
QRE 26.2.2	See QRE 26.1.1			See QRE 26.1.1.		
4-12-20-0-0		ata: For access to LinkedIn A	APIs, a developer needs		application process to acc	ess the MS MARCO, ORCAS,
QRE 26.2.3	to create a developer <u>a</u>	pplication, complete addition cular APIs the developer is	onal requirements that	or Bing Coronavirus Que	ery datasets. Users may	freely access the datasets  ORCAS websites and Bing

	agree to relevant terms and conditions for use of such APIs. Upon	Coronavirus Query page on <u>Github</u> or <u>MSR</u> Open Data page. No application or
	satisfying the requirements, the developer's application with be	credentialing is required.
	provisioned with the relevant APIs. For access to other data sets, the	
	researchers may email the Economic Graph Research team at	For Bing Search's Keyword Research tool, Researchers may add their website
	egr_data@linkedin.com.	(new or existing) to Bing Search Webmaster Tools and can freely use <u>Keyword</u>
		Research - Bing Webmaster Tools or Backlinks - Bing Webmaster Tools.
	Access to Public Data: Access to the data described in QRE 28.2.1 is	
	available to anyone that visits the relevant sites: <u>LinkedIn GitHub</u>	Bing Search APIs are accessible at Bing APIs and may be accessed by signing
	Repository; LinkedIn Workforce Data; and LinkedIn World Bank Data.	up for an account.
	For access to other data, researchers may be provided with datasets and information as part of research inquiries and research partnerships with	Other Microsoft datasets, including datasets derived by Bing Search, are accessible at Researcher tools: code & datasets - Microsoft Research and
	LinkedIn. Researchers may contact LinkedIn to discuss research opportunities.	Microsoft Research Open Data (msropendata.com). These also do not require credentials and datasets may be freely downloaded by researchers.
	LinkedIn is continuing to explore possibilities to streamline data access consistent with this provision and in accordance with LinkedIn commitment to data sharing and collaboration with the research community.	For other research data, researchers may be provided datasets and information as part of research partnerships with Microsoft Research. Researchers may contact Microsoft Research to discuss research opportunities.
	Community.	And of course, the Bing Search service is also entirely public and may be used for a variety of research purposes without login or credentials.
		Microsoft is continuing to explore possibilities to streamline data access consistent with this provision and in accordance with Microsoft Research's longstanding data sharing and collaboration with the research community.
SLI 26.2.1 -	Methodology of data measurement	Methodology of data measurement
meaningful		
metrics on the	LinkedIn will publish information as it continues to build further data	Bing Search does not gate access for its datasets and therefore this metric is
uptake,	research infrastructure pertinent to these commitments.	inapplicable, as any individual may freely access the tools.
swiftness, and		
acceptance		Bing Search hopes to provide additional metrics pursuant to this measure in its
level of the		next report.

tools and processes in Measure 26.2							Bing Search has provided data on the viewership of data in MSR Opendata the 1-31 December 2022 Reporting Period based on existing data tracking Note that MSR OpenData is but one of the locations where these datasets must be accessed; however, it is currently the only tool Microsoft can provide metrifor.					sed on existing data tracking.
	No of monthly users	No of applica- tions received	No of applica- tions rejected	No of applica- tions accepted	Average response time	Other metrics	No of monthl y users	No of applica -tions receive d	No of applic ations reject ed	No of applicat ions accepte d	Avera ge respo nse time	Other metrics
												Page Views for Bing Coronavirus Query Set (Reporting Period) on MSR OpenData: 121  Page Views for MS MARCO on MSR OpenData (Reporting Period): 12  Downloads of Bing Coronavirus Query Set (Reporting Period) on MSR OpenData: 4  Downloads of MS MARCO
												on MSR OpenData (Reporting Period): 0

Measure 26.3	LinkedIn	Bing Search
QRE 26.3.1	LinkedIn provides API support via <u>StackOverflow</u> . LinkedIn provides a	Users can report issues accessing MS MARCO and ORCAS datasets to ms-
	comprehensive Help Center for assistance with other matters. LinkedIn	marco@microsoft.com. Microsoft endeavors to restore access and address any
	endeavors to restore access and address any issues expeditiously.	issues with dataset access expeditiously.
		For Bing's Keyword Research tool, users can report issues by creating a support
		request ticket at Webmaster Support - Bing Webmaster Tools.
		For Microsoft Open Data, users can report issues by emailing
		msrod@microsoft.com.
		For Bing APIs, users can create a support ticket request through the link at <u>Bing</u>
		Search APIs   Microsoft Bing.

VI. Empowering the research communit	VI.	wering the	research	community
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## Commitment 27

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

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

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

Measure 27.1	LinkedIn	Bing Search		
QRE 27.1.1	Work in the Permanent Task-force on the development of the	Work in the Permanent Task-force on the development of the independent		
	independent third-party body has not yet started at the time of	third-party body has not yet started at the time of submission of this		
	submission of this report.	report		
Measure 27.2	LinkedIn	Bing Search		
	As the work in the Permanent Task-force on the development of the	As the work in the Permanent Task-force on the development of the		
ORE 27.2.1	independent third-party body has not yet started at the time of	independent third-party body has not yet started at the time of submission		
QKE 21.2.1	submission of this report, there has not yet been any funding	of this report, there has not yet been any funding allocated to the		
	allocated to the implementation of Measure 27.2.	implementation of Measure 27.2.		
Measure 27.3	LinkedIn	Bing Search		
	As the work in the Permanent Taskforce on the development of the	As the work in the Permanent Taskforce on the development of the		
ODE 27.2.1	independent third-party body has not yet started at the time of	independent third-party body has not yet started at the time of submission		
QRE 27.3.1	submission of this report, no cooperation with this body has yet	of this report, no cooperation with this body has yet taken place as set out		
	taken place as set out under Measure 27.3.	under Measure 27.3.		
	Methodology of data measurement	Methodology of data measurement		
	As the work in the Permanent Taskforce on the development of the	As the work in the Permanent Taskforce on the development of the		
SLI 27.3.1 - research	independent third-party body has not yet started at the time of	independent third-party body has not yet started at the time of submission		
projects vetted by the independent third-	submission of this report, no research projects have yet been vetted	of this report, no research projects have yet been vetted by this body, as set		
party body	by this body, as set out under Measure 27.3.	out under Measure 27.3.		
	Nr of research projects for which they provided access to data	Nr of research projects for which they provided access to data		
	n/a	n/a		
Member States	n/a	n/a		
Measure 27.4	LinkedIn	Bing Search		
ORE 27.4.1	Microsoft is partnering with Princeton University and the Carnegie	Microsoft is partnering with Princeton University and the Carnegie		
QILL 27.4. I	Endowment for International Peace to fund and provide data to the	Endowment for International Peace to fund and provide data to the Institute		

Institute for Research on the Information Environment (IRIE), an	for Research on the Information Environment (IRIE), an international resource
international resource to study information ecosystems that can spur	to study information ecosystems that can spur evidence-based policy
evidence-based policy solutions.	solutions.
	Please see responses to QREs 26.1-2 and QRE 28.1.1.

VI. Empowering the research community									
	Commitment 28								
Relevant Signatories commit to support good faith research into Disinformation that involves their services.									
	C.28	M 28.1	M 28.2	M 28.3	M 28.4				
We signed up to the	LinkedIn	LinkedIn	LinkedIn	LinkedIn	LinkedIn				
following measures of	Bing Search	Bing Search	Bing Search	Bing Search	Bing Search				
this commitment:									
	LinkedIn			Bing Search	Bing Search				
In line with this	No			No					
commitment, did you									
deploy new									
implementation									
measures (e.g. changes									
to your terms of									
service, new tools, new									
policies, etc)? [Yes/No]									
If yes, list these	New Implementation I	Measures		New Implementa	tion Measures				
implementation									
measures here .	Not applicable			Not applicable					

Do you plan to put	No	Yes
further implementation		
measures in place in		
the next 6 months to		
substantially improve		
the maturity of the		
implementation of this		
commitment? [Yes/No]		
If yes, which further	Planned Implementation Measures	Planned Implementation Measures
implementation		
measures do you plan	Not applicable	Microsoft Research regularly explores potential partnerships with third party
to put in place in the		research institutions and is actively in discussions with several research
next 6 months?		institutions on potential misinformation and disinformation related research
		that may leverage Bing Search data.
Measure 28.1	LinkedIn	Bing Search
QRE 28.1.1	LinkedIn facilitates research, engages with the research community,	Bing Search facilitates research, engages with the research community, and
	and provides data to the research community in a variety of ways, as	provides data to the research community in a variety of ways, as described
	described below and in QRE 26.1-2.	below and in QRE 26.1-2.
	Historically, LinkedIn's work with external stakeholders, including, for	Microsoft Research dedicates significant resources to supporting, promoting,
	example, research institutes, and academia, to understand the	and developing research on emerging issues including responsible AI, safe
	example, research institutes, and academia, to understand the rapidly changing world of work through access to and use of	and developing research on emerging issues including responsible Al, safe design, search and information retrieval, and algorithms. Microsoft Research
	example, research institutes, and academia, to understand the rapidly changing world of work through access to and use of LinkedIn data. Additionally, LinkedIn employs academics to gain	and developing research on emerging issues including responsible AI, safe design, search and information retrieval, and algorithms. Microsoft Research teams regularly utilise Bing Search datasets as part of important research
	example, research institutes, and academia, to understand the rapidly changing world of work through access to and use of LinkedIn data. Additionally, LinkedIn employs academics to gain practical experience combining industry knowledge with academic	and developing research on emerging issues including responsible Al, safe design, search and information retrieval, and algorithms. Microsoft Research
	example, research institutes, and academia, to understand the rapidly changing world of work through access to and use of LinkedIn data. Additionally, LinkedIn employs academics to gain practical experience combining industry knowledge with academic expertise to solve complex business problems spanning all areas of	and developing research on emerging issues including responsible AI, safe design, search and information retrieval, and algorithms. Microsoft Research teams regularly utilise Bing Search datasets as part of important research efforts, including those focused on misinformation and disinformation.
	example, research institutes, and academia, to understand the rapidly changing world of work through access to and use of LinkedIn data. Additionally, LinkedIn employs academics to gain practical experience combining industry knowledge with academic expertise to solve complex business problems spanning all areas of engineering, with an initial focus on artificial intelligence (including	and developing research on emerging issues including responsible AI, safe design, search and information retrieval, and algorithms. Microsoft Research teams regularly utilise Bing Search datasets as part of important research efforts, including those focused on misinformation and disinformation.  For example, Microsoft Research is currently working on research related to
	example, research institutes, and academia, to understand the rapidly changing world of work through access to and use of LinkedIn data. Additionally, LinkedIn employs academics to gain practical experience combining industry knowledge with academic expertise to solve complex business problems spanning all areas of engineering, with an initial focus on artificial intelligence (including work related to large recommender systems and deep learning	and developing research on emerging issues including responsible AI, safe design, search and information retrieval, and algorithms. Microsoft Research teams regularly utilise Bing Search datasets as part of important research efforts, including those focused on misinformation and disinformation.  For example, Microsoft Research is currently working on research related to medical hoaxes and another project concerning improvements to auto-
	example, research institutes, and academia, to understand the rapidly changing world of work through access to and use of LinkedIn data. Additionally, LinkedIn employs academics to gain practical experience combining industry knowledge with academic expertise to solve complex business problems spanning all areas of engineering, with an initial focus on artificial intelligence (including	and developing research on emerging issues including responsible AI, safe design, search and information retrieval, and algorithms. Microsoft Research teams regularly utilise Bing Search datasets as part of important research efforts, including those focused on misinformation and disinformation.  For example, Microsoft Research is currently working on research related to

	While the foregoing work remains critical to our mission, we are	propaganda is consumed and how new propaganda websites appear. Bing
	working to expand access to data for research purposes consistent	will provide additional updates as the research is made public.
	with the goals of the CoP as well as the applicable requirements of	
	the DSA and look forward to providing further information on this in	Microsoft Research regularly explores potential partnerships with third party
	future reports.	research institutions and is actively in discussions with several research institutions on potential misinformation and disinformation related research
	Additionally, LinkedIn regularly explores potential partnerships with non-governmental and research institutions and is actively in	that may leverage Bing Search data. Bing hopes to publicly announce additional partnerships in its next report.
	discussions with one research institution to conduct a data and	
	recommender system pilot project leveraging LinkedIn data.	Lastly, Bing also partners with third party nonprofits and research
	LinkedIn hopes to publicly announce this partnership in its next	organisations to review and evaluate emerging trends, techniques, tactics,
	report.	and threat intelligence in disinformation.
	Finally, LinkedIn has in place the needed teams and tools to make	
	data available to researchers in a variety of ways, including via Excel	
	or XML files, GitHub repositories, sandboxed laptops, and APIs.	
Measure 28.2	LinkedIn	Bing Search
QRE 28.2.1	Please see QRE 26.1.1 and QRE 26.2.3.	See QRE 26.2.3 and 26.1.1.
	Thease see GNE 20.1.1 and GNE 20.2.5.	
Measure 28.3	LinkedIn	Bing Search
		Bing Search  We look forward to partnering with other relevant signatories on this project
Measure 28.3	LinkedIn  We look forward to partnering with other relevant signatories on this	We look forward to partnering with other relevant signatories on this project
Measure 28.3	LinkedIn	
Measure 28.3	LinkedIn  We look forward to partnering with other relevant signatories on this project and will provide further reporting as the annual consultation	We look forward to partnering with other relevant signatories on this project
Measure 28.3	LinkedIn  We look forward to partnering with other relevant signatories on this project and will provide further reporting as the annual consultation	We look forward to partnering with other relevant signatories on this project
Measure 28.3  QRE 28.3.1	LinkedIn  We look forward to partnering with other relevant signatories on this project and will provide further reporting as the annual consultation is established.	We look forward to partnering with other relevant signatories on this project and will provide further reporting as the annual consultation is established.
Measure 28.3  QRE 28.3.1  Measure 28.4	LinkedIn  We look forward to partnering with other relevant signatories on this project and will provide further reporting as the annual consultation is established.  LinkedIn	We look forward to partnering with other relevant signatories on this project and will provide further reporting as the annual consultation is established.  Bing Search
Measure 28.3  QRE 28.3.1  Measure 28.4	LinkedIn  We look forward to partnering with other relevant signatories on this project and will provide further reporting as the annual consultation is established.  LinkedIn  We will provide information on relevant financial commitments once	We look forward to partnering with other relevant signatories on this project and will provide further reporting as the annual consultation is established.  Bing Search  We will provide information on relevant financial commitments once such
Measure 28.3  QRE 28.3.1  Measure 28.4	LinkedIn  We look forward to partnering with other relevant signatories on this project and will provide further reporting as the annual consultation is established.  LinkedIn  We will provide information on relevant financial commitments once such requests are received and the EDMO process for providing	We look forward to partnering with other relevant signatories on this project and will provide further reporting as the annual consultation is established.  Bing Search  We will provide information on relevant financial commitments once such requests are received and the EDMO process for providing research funds is

## 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.

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

## VII. Empowering the Fact-checking Community Commitments 30 - 33

#### VII. Empowering the fact-checking community

#### Commitment 30

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

	C.30	M 30.1	M 30.2	M 30.3	M 30.4
We signed up to the	LinkedIn	LinkedIn	LinkedIn	LinkedIn	LinkedIn
following measures of	Bing Search	Bing Search	Bing Search	Bing Search	Bing Search
this commitment:					
	LinkedIn			Bing Search	
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	Yes			No	
If yes, list these implementation	New Implementation	Measures		New Implementation	on Measures
measures here .	LinkedIn has engage external fact-checking		ered into agreements with	Not applicable	
Do you plan to put further implementation measures in place in the next 6 months to substantially improve	Yes			No	

the maturity of the implementation of this commitment? [Yes/No]		
If yes, which further implementation	Planned Implementation Measures	Planned Implementation Measures
measures do you plan to put in place in the next 6 months?	LinkedIn is in discussions with external fact-checking organisations to deepen their relationship and also expand the included language coverage.	Bing's existing programs are already designed to address these issues, but, of course, Bing regularly evaluates the efficacy of its measures and endeavors to improve and respond quickly to new threats or issues as they arise. Bing also regularly considers potential improvements or enhancements to its product features.
Measure 30.1	LinkedIn	Bing Search
QRE 30.1.1	LinkedIn has entered into longer term and pilot fact-checking arrangements with external, independent global news agencies.  These relationships help our internal content reviewers determine if user generated content violates LinkedIn Professional Community Policies. Content that violates LinkedIn's policies is removed from the platform.	Bing Search supports the schema.org ClaimReview fact-check protocol as part of its search ingestion, as discussed further in QREs 21.1.1 and 30.2.2. Because ClaimReview is an open protocol available for all websites and search engines to use, Bing does not maintain formal agreements with any individual fact-checking organisation.  Bing continues to evaluate additional fact-checking organisations and tools
QRE 30.1.2	Reuters, and one other pilot arrangement.	for use by search engines.  Bing Search supports the schema.org ClaimReview fact-check protocol as part of its search ingestion, as discussed further in QREs 21.1.1 and 30.2.2.  Because ClaimReview is an open protocol available for all websites and search engines to use, Bing does not maintain formal agreements with any individual fact-checking organisation.
		Bing continues to evaluate additional fact-checking organisations and tools for use by search engines.
QRE 30.1.3	LinkedIn has implemented internal processes empowering our hundreds of global internal content reviewers to be able to obtain a fact-check from external fact-checker partnerships. Fact-checker conclusions are reviewed by internal content reviewers to determine	As noted under QREs 30.1.1 and 30.1.2, any authorised fact check organisation can leverage the free ClaimReview protocol to provide fact checks to Bing Search. Bing welcomes the opportunity to partner with additional fact checking organisations and is actively exploring proposals and

	whether the content at issue violates LinkedIn's Professional	partnerships with additional fact-checking organisations. Bing would
	Community Policies and if so, the content is removed from the	welcome additional coverage and usage of ClaimReview tags for fact check
	platform.	content in EU Member States to help expand fact-checking coverage.
	piationn.	content in 20 Wember States to help expand fact effecting coverage.
	Methodology of data measurement	Methodology of data measurement
SLI 30.1.1 - Member States and languages covered by agreements with the fact-checking organisations	LinkedIn is currently in negotiations with multiple fact-checkers to expand language coverage from English, Spanish, and Portuguese.	As set out in QRE 30.1.2 and SLI 31.1.1, because ClaimReview is an open protocol available for all websites and search engines to use, Bing Search does not maintain formal agreements with any individual fact-checking organisation. As any fact check organisation can leverage the free ClaimReview protocol to embed fact check tags into their website, there is no limitation in terms of languages and Member States covered.
	Nr of agreements with fact-checking organisations	Nr of agreements with fact-checking organisations:
	2	Not applicable, see above
Member States	LinkedIn sends content to external fact checkers regardless of the	Not applicable
	location of the member posting the content, the viewers of the	
	content, or the topic at issue. Content that violates LinkedIn's	
	Professional Community Policies is removed.	
Measure 30.2	LinkedIn	Bing Search
	LinkedIn has engaged in arms-length negotiations with large global	Bing Search continues to explore additional fact-checking partners and has
QRE 30.2.1	news organisations that follow the highest ethical standards in news reporting, including those related to accuracy, independence, integrity, and freedom from bias. See <u>Standards &amp; Values   Style Guide   Reuters (reutersagency.com)</u> . Our agreements give the fact-checkers complete discretion in providing their fact-checking conclusions, and LinkedIn personnel leverage these conclusions to determine whether the content at issue violates LinkedIn's Professional Community Policies. Content that violates LinkedIn's	engaged in efforts to discuss potential relationships with additional fact-checking organisations. However, Bing currently supports the free and open ClaimReview protocol, which may be utilised by all fact-checking organisations to embed fact-check tags into content, articles, and websites that appear in search indexes. Bing welcomes the opportunity to partner with additional fact checking organisations. See also QREs 30.1.1-3.
	policies is removed.	

QRE 30.2.2	LinkedIn meets with its fact-checking partners to discuss improvements in process and is currently in the process of negotiating renewals to its fact-checking arrangements.	As noted above, Bing Search ingests ClaimReview tags embedded in fact-check content posted on websites that are indexed in the Bing Search index. Webmasters for fact-checking organisations have self-help tools available that allow them to review website analytics and search effectiveness (including insights into keywords or search queries used in Bing to reach their website) for websites containing ClaimReview tags as part of Bing's Webmaster Tools, discussed further at QRE 32.1.1. This dashboard provides website operators with a range of data and analytics that can be used by fact-checking organisations to assess how users found their fact-checked content, website traffic patterns, and the effectiveness of their fact check tags.  See QREs 30.1.1-2 for additional information on Bing Search's ClaimReview fact check program.
QRE 30.2.3	This QRE is not relevant or pertinent as LinkedIn is not a fact-checking organisation.	This QRE is not relevant or pertinent as Bing Search is not a fact-checking organisation.
Measure 30.3	LinkedIn	Bing Search
QRE 30.3.1	LinkedIn relies on globally-recognised independent news agencies for its fact-checking needs, and does not typically seek fact-checks from numerous different fact-checkers for the same underlying content.	Bing Search looks forward to partnering with other relevant signatories and the fact-checking community on this Measure moving forward. See also QRE 30.1.1-2.
Measure 30.4	LinkedIn	Bing Search
QRE 30.4.1	LinkedIn stands ready to cooperate in accordance with this QRE at the appropriate time.	Bing Search stands ready to cooperate in accordance with this QRE at the appropriate time.

#### VII. Empowering the fact-checking community

#### Commitment 31

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

	C.31	M 31.1	M 31.2		M 31.3	M 31.4	
We signed up to the following measures	LinkedIn Bing Search	LinkedIn	LinkedIn Bing Search		LinkedIn Bing Search	LinkedIn Bing Search	
of this commitment:	LinkedIn			Bing Sea	 nrch		
				3			
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	Yes			No			
If yes, list these	New Implementation	n Measures		New Imp	lementation Measures		
implementation							
measures here .	Same as Measure 3	0: LinkedIn has enga	aged with and entered	Not applicable			
	into agreements wi	th external fact-checl	king organisations.				
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment?	Yes			Yes			

If yes, which further implementation	Planned Impl	ementation Measure	es		Planned Implementation Measures				
measures do you plan to put in place in the next 6 months?	Same as Measure 30: LinkedIn is in discussions with external fact-checking organisations to deepen their relationship and also expand the included language coverage.				] 5 51 11				
Measure 31.1	LinkedIn				relevant or pertinent to Bin	g Search as it does	not showcase User		
					Generated Content.				
Measure 31.2	LinkedIn			Bing Search					
QRE 31.1.1	LinkedIn leverages its fact-checkers to review user generated content that may violate its Professional Community Policies, which prohibit misinformation. Content that violates LinkedIn's			ClaimReview fact check labels.					
	Professional Community Policies is removed from LinkedIn.			nkedIn.	Bing Search uses ClaimReview tags embedded in websites with fact-checked content to help inform its algorithms (i.e., by leading users to more authoritative sources of information) and to provide useful context and indications of trustworthiness to its users.				
	Methodology	of data measureme	ent		Methodology of data measurement				
SLI 31.1.1 - use of fact-checks	The figure for the number of content pieces reviewed by fact-checkers represents the number of pieces sent to our external fact checkers during the period 1 – 31 December 2022. See also SLI 21.1.2			ır external	containing a ClaimReview tag (i.e. fact-check content) that appeared on the first page of Bing search results for any number of users located in the EU Member States.  Fact Check Impressions ("FCI") – The number of times the above mentioned UR appeared on the first page of Bing search results to a user located in the EU Member States.				
	Nr of fact- checked articles published	Reach of fact- checked	Nr of content pieces reviewed by fact-checkers	Other	States.  Nr of fact-checked articles published	Reach of fact-checked	Nr of content pieces reviewed by fact-checkers	Other  FC URL	
Member States								_	
Austria						117		41	

Total EEA	_	-	-	9,911	1,090
Total EU	0	N/A	252	9,711	1,046
Norway				200	44
Liechtenstein				0	0
celand				0	0
Sweden				334	84
Spain				517	105
Slovenia				0	0
Slovakia				0	0
Romania				1	1
Portugal				4,707	65
Poland				306	67
Netherlands				641	104
Malta				0	0
Luxembourg				0	0
Lithuania				0	0
Latvia				0	0
taly				463	104
reland				256	81
Hungary				0	0
Greece				0	0
Germany				1,250	147
France				615	109
Finland				84	26
Estonia Estonia				0	0
Denmark				109	37
Czech Republic				0	0
Cyprus				0	0
Croatia				0	0
Belgium Bulgaria				311	75

	Methodology of da	ata measurement		Methodology of data measurem	ent		
Not applicable as LinkedIn doesn't label content on its platform. LinkedIn leverages its fact-checkers to review content that may violate its Professional Community Policies, which prohibit misinformation. Content that violates LinkedIn's Professional Community Policies is removed from LinkedIn.							
	Nr of pieces of content labelled	Impact of said measures on user interactions with information labelled as false or misleading	Other	Nr of pieces of content labelled	Impact of said measures on user interactions with information labelled as false or misleading	Other	
Member States	0	Not applicable		0	Not applicable		
	Methodology of da	ata measurement		Methodology of data measurement			
SLI 31.1.3 – Quantitative information used for contextualisation for the SLIs 31.1.1 /	contextualisation of	ward to working with ot of SLIs 31.1.1 and 31.1.2, to our platform. decided within the TF ah	aking into account	SLIs 31.1.1 and 31.1.2, taking into account the unique nature and role of search engines.			
31.1.2	'						
	Not applicable			Not applicable			
Member States	Not applicable			Not applicable			
Measure 31.3	LinkedIn			Bing Search			
QRE 31.3.1	As the work in the Permanent Task-force on the development of the repository of fact-checking content has not yet started at the time of submission of this report, no contributions as listed under Measure 31.3 can currently be reported on.			As the work in the Permanent T fact-checking content has not ye contributions as listed under Me	et started at the time of submis	sion of this report, no	

Measure 31.4	LinkedIn	Bing Search
QRE 31.4.1	As the work in the Permanent Taskforce on the development of the repository of fact-checking content has not yet started at the time of submission of this report, no technical solutions as referred to under Measure 31.4 can currently be reported on.	As the work in the Permanent Taskforce on the development of the repository of fact-checking content has not yet started at the time of submission of this report, no technical solutions as referred to under Measure 31.4 can currently be reported on.

#### VII. Empowering the fact-checking community

#### Commitment 32

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

	C.32	M 32.1	M 32.2	M 32.3
We signed up to the	LinkedIn	LinkedIn	LinkedIn	LinkedIn
following measures of	Bing Search	Bing Search		Bing Search
this commitment:	_			_
	LinkedIn		Bing Search	
In line with this	Yes		No	
commitment, did you				
deploy new				
implementation				
measures (e.g. changes				
to your terms of				
service, new tools, new				
policies, etc)? [Yes/No]				

If yes, list these implementation	New Implementation Measures	New Implementation Measures
measures here .	Same as Measure 30: LinkedIn has engaged with and entered into agreements with external fact-checking organisations.	Not applicable
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	Yes	No
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures  Same as Measure 30: LinkedIn is in discussions with external fact-checking organisations to deepen their relationship and also expand the included language coverage.	Planned Implementation Measures  Not applicable
Measure 32.1	LinkedIn	Bing Search
Measure 32.2	LinkedIn	This Measure is not relevant to Bing Search as it does not showcase User Generated Content.

SLI 32.1.1 – use of the				Methodology of da	Methodology of data measurement  See SLI 31.1.1.		
interfaces and other tools	Monthly users	Other	Other	Monthly users	Other	Other	
Member States	Not applicable	<u>.</u>					
Measure 32.3	LinkedIn			Bing Search	Bing Search		
QRE 32.3.1		to explore ways in age with its fact-check	which it can further sup ing partners.	'   "	Bing Search welcomes continued cooperation with signatories and fact checking organisations.		

	VII. Empowering the fact-checking community		
	Commitment 33		
Relevant Signatories (i.e. fact-checking organisations) commit to operate on the basis of strict ethical and transparency rules, and to protect their independence.			
	C.33	M 33.1	
We signed up to the Commitment 33 is aimed specifically at fact-checking organisations and therefore not relevant or pertinent to Not applicable			
following measures of	Microsoft and its services.		
this commitment:			

## VIII. Transparency Centre Commitments 34 - 36

#### **VIII. Transparency Centre**

### Commitment 34

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

In line with this commitment, did you deploy new	Yes
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here .	New implementation Measures
	- Microsoft, together with several other 'funding Signatories', provided funding for setting up and operating
	the Transparency Centre website.
	- Microsoft, together with other 'funding Signatories', entered into a contractual agreement with a
	recognised digital agency with long-standing experience in complex web design to create an easily
	searchable, user-friendly website.
	- Microsoft participated in regular meetings of the Task-Force subgroup in order to provide input on the
	expected functionalities and design of the Transparency Center website.
Do you plan to put further implementation measures in place	Yes
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	- Microsoft is committed to the proper functioning of the Transparency Center website and will therefore
	continue its engagement in the Transparency Center subgroup in order to assess the necessity of technical
	adjustments and new actions to improve the website based on the experience with the Baseline reports.
	- Microsoft will thereby contribute to, where necessary, making the website more user-friendly and easily
	accessible for users ahead of the next reporting period.

Measure 34.1	Microsoft Corporation
Measure 34.2	Microsoft Corporation
Measure 34.3	Microsoft Corporation
Measure 34.4	Microsoft Corporation
Measure 34.5	Microsoft Corporation

#### **VIII. Transparency Centre**

#### Commitment 35

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

In line with this commitment, did you deploy new	Yes
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here .	New implementation Measures
	- Microsoft will upload its Baseline Report to the Transparency Center website in a timely manner, which
	includes clear and simple information on the new or existing policies and actions that each service has
	implemented based on its Subscription document.
	- Microsoft has actively contributed to discussions in the Subgroup aimed at ensuring the website is
	designed in a user-friendly way, so that user can easily search through the Commitments, Measures,
	Qualitative Reporting Elements and Service Level Indicators for each service.
Do you plan to put further implementation measures in place	Yes
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	- Microsoft will assess the necessity of technical adjustments and new actions to improve the website based
	on the experience of the Baseline reports.

	<ul> <li>Microsoft will contribute to actions where necessary, aimed at making the website more user-friendly and easily accessible for users ahead of the next reporting period.</li> <li>Microsoft commits to publish in a timely manner information regarding specific mitigation actions related to future crises across the EEA.</li> </ul>
Measure 35.1	Microsoft Corporation
Measure 35.2	Microsoft Corporation
Measure 35.3	Microsoft Corporation
Measure 35.4	Microsoft Corporation
Measure 35.5	Microsoft Corporation
Measure 35.6	Microsoft Corporation

VIII. Transparency Centre		
Commitment 36		
Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner.		
In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	No	
If yes, list these implementation measures here .	New implementation Measures  - The Measures under this Commitment cover potential updates to be introduced after the publishing of the Baseline report.	
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	Yes	
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures	

	- Microsoft reiterates its commitment with regard to providing regular updates as set out under Measures
	36.1, 36.2 and 36.3.
Measure 36.1	Microsoft Corporation
Measure 36.2	Microsoft Corporation
Measure 36.3	Microsoft Corporation
QRE 36.1.1 (for the Commitments 34-36)	- We are pleased to confirm that we have been an active participant in the subgroup that has successfully launched the common Transparency Centre this year. We have assisted with establishing the website's requirements, selecting a vendor to build the website and overseeing the development of the website's key functionalities and interface. We have ensured that the Centre will allow the general public to access general information about the Code as well as the underlying reports (and for the Centre to be navigated both by commitment and signatory). Each signatory will be responsible for ensuring that the information they upload to the website is correct and accurate. Entities interested in joining the Code's Task-force will be able to sign up through a dedicated online application form on the website.
QRE 36.1.2 (for the Commitments 34-36)	This QRE is not yet relevant as it covers changes and updates to be introduced after the publishing of the Baseline report.
SLI 36.1.1 - (for Measures 34 and 36) meaningful	Methodology of data measurement
quantitative information on the usage of the	- This SLI is not yet relevant as it covers information to be introduced after the publishing of the Baseline
Transparency Centre, such as the average monthly visits	report.
of the webpage.	Our company would like to provide following data:
	- Not yet applicable.
Member States	
List actions per member states and languages (see example table above)	- Not yet applicable.

## IX. Permanent Task-Force Commitment 37

#### IX. Permanent Task-Force

#### Commitment 37

Signatories commit to participate in the permanent Task-force. The Task-force includes the Signatories of the Code and representatives from EDMO and ERGA. It is chaired by the European Commission, and includes representatives of the European External Action Service (EEAS). The Task-force can also invite relevant experts as observers to support its work. Decisions of the Task-force are made by consensus.

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

Measure 37.1	Microsoft Corporation
Measure 37.2	Microsoft Corporation
Measure 37.3	Microsoft Corporation
Measure 37.4	Microsoft Corporation
Measure 37.5	Microsoft Corporation
Measure 37.6	Microsoft Corporation
QRE 37.6.1	<ul> <li>Since June 2022, Microsoft has actively engaged in and contributed to all the Task-force Plenary meetings as well as to the bi-weekly meetings of all Subgroups and Working Groups that have so far been set up under the Task-force:         <ul> <li>Scrutiny of Advertising Subgroup</li> <li>Integrity of Services Subgroup</li> <li>Monitoring and Reporting Subgroup</li> <li>Structural Indicators Working Group</li> <li>Crisis Response Subgroup</li> <li>Transparency Centre Subgroup</li> <li>Outreach and Integration of New Signatories Subgroup.</li> </ul> </li> <li>As part of each Subgroup and Working Group, Microsoft has actively contributed to the development of the deliverables that were collectively agreed to be most urgent leading up to the Baseline report, which include:</li></ul>

<ul> <li>developing a workflow document to onboard and bring up to speed new signatories.</li> </ul>
- Microsoft has continuously engaged with all Signatories of the Code, offering its perspectives on issues
unique to its subscribed services and responding to ad-hoc inquiries related to various actions taken by
its subscribed services. Microsoft appreciates the immense value and unique insights that the Task-Force
has created for each Signatory individually as well as the collective community of Signatories. Microsoft
looks forward to continued constructive cooperation within the Code of Practice's governance framework.

## X. Monitoring of the Code Commitments 38 - 44

#### Commitment 38

The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes to ensure the implementation of their commitments under the Code.

In line with this commitment, did you deploy new implementation measures (e.g. changes to your terms of service, new tools, new policies, etc)? [Yes/No]	Yes
If yes, list these implementation measures here .	<ul> <li>Implemented a dedicated cross-company team to ensure proper tracking and compliance with the Code of Practice across all applicable geographical areas, consisting of relevant product members from all subscribed services, attorneys, members of the European Government Affairs team and Democracy Forward Team.</li> <li>Implemented an internal tracking process that captured all relevant commitments, responsible entity and persons responsible for compliance with the Code of Practice.</li> <li>Weekly meetings of the dedicated team were held where progress on implementation was reviewed and updated and input related to the multiple Task-force subgroups priority deliverables were discussed including reporting templates and methodologies.</li> <li>Budget items from across Microsoft teams have been used to ensure compliance including ongoing investment in trusted third parties like NewsGuard and GDI, as well as the funding of the Transparency Centre website.</li> </ul>
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	Yes
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Microsoft will keep its dedicated cross-company team in place to ensure continued progress towards compliance of relevant measures. As Microsoft works towards DSA compliance any items impacting

	commitments under this Code of Practice will be tracked and updated to ensure crossMicrosoft consistency of implementation and compliance.
Measure 38.1	Microsoft Corporation
QRE 38.1.1	<ul> <li>Implemented a dedicated cross-company team to ensure proper tracking and compliance with the Code of Practice across all applicable geographical areas, consisting of relevant product members from all subscribed services as well as relevant lawyers, members of the European Government Affairs team and Democracy Forward Team.</li> <li>Implemented an internal tracking process that captured all relevant commitments, responsible entity and persons responsible for compliance with the Code of Practice.</li> </ul>

#### Commitment 39

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

In line with this commitment, did you deploy new	Yes
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here .	New implementation Measures
	Microsoft has worked intensively over the past seven months to ensure it is in a good position for the delivery of the Baseline report and looks forward to further expanding and deepening its implementation work ahead of the first full report mid-2023.
Do you plan to put further implementation measures in place	Yes
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	

If yes, which further implementation measures do you plan to	Planned Implementation Measures		
put in place in the next 6 months?			
	Microsoft looks forward to further expanding and deepening its implementation work ahead of the first full		
	report mid-2023. This will further the maturation of reporting for the technical indicators and reporting in		
	the Transparency Centre when ready, as well as additional reporting through the crisis response subgroup		
	related to requests for information on Russia's war on Ukraine and COVID-19.		

#### Commitment 40

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

In line with this commitment, did you deploy new	Yes
	res
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here .	New implementation Measures
	This Baseline report sets out in detail the measures that Microsoft and its subscribing services have taken in
	view of the regular reporting that they have subscribed to under the Code of Practice.
Do you plan to put further implementation measures in place	Yes
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	
	Microsoft has worked intensively over the past seven months to ensure it is in a good position for the delivery
	of the Baseline report and looks forward to further expanding and deepening its implementation work ahead
	of the first full report mid-2023.

	With regard to the frequency of reporting, this will be determined by the outcome of the European Commission's designation process for Very Large Online Platforms (VLOPs) and Very Large Online Search Engines (VLOSEs) under the Digital Services Act, a process which is currently still ongoing.
Measure 40.1	Microsoft Corporation
Measure 40.2	Microsoft Corporation
Measure 40.3	Microsoft Corporation
Measure 40.4	Microsoft Corporation
Measure 40.5	Microsoft Corporation
Measure 40.6	Microsoft Corporation

#### Commitment 41

Signatories commit to work within the Task-force towards developing Structural Indicators, and publish a first set of them within 9 months from the signature of this Code; and to publish an initial measurement alongside their first full report. To achieve this goal, Signatories commit to support their implementation, including the testing and adapting of the initial set of Structural Indicators agreed in this Code. This, in order to assess the effectiveness of the Code in reducing the spread of online disinformation for each of the relevant Signatories, and for the entire online ecosystem in the EU and at Member State level. Signatories will collaborate with relevant actors in that regard, including ERGA and EDMO.

In line with this commitment, did you deploy new	Yes
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here .	New implementation Measures
	Microsoft has actively participated in and contributed to the discussions in the Structural Indicators Working
	Group with a view to enabling the development of a workable proposal for such indicators and subsequent
	publication of an initial measurement of those indicators alongside our first full report in the second half of
	2023. In the course of the discussions in the Working Group, Signatories, together with the European

Measure 41.2 Measure 41.3	Microsoft Corporation  Microsoft Corporation
Measure 41.1	Microsoft Corporation
	in July of 2023.
	Indicators Working Group to work towards timely delivery of Structural Indicators ahead of our first full report
	Microsoft and its subscribed services look forward to continuing its active engagement in the Structural
put in place in the next 6 months?	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
the implementation of this commitment? [Yes/No]	
in the next 6 months to substantially improve the maturity of	
Do you plan to put further implementation measures in place	Yes
	services would be explored at a later stage.
	– given the unique and important role that search engines play in providing access to information and other
	focus on indicators related to social media platforms, while the development of a framework for search engines
	of disinformation as the initial set of Structural Indicators. It was also agreed that the initial discussions would
	Commission, ERGA and EDMO, subsequently agreed to focus efforts on the prevalence, sources and audience

#### Commitment 42

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

In line with this commitment, did you deploy new	Yes
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here .	New implementation Measures
	Microsoft has been an active participant in and contributor to the Task-force's Crisis Response Subgroup, in which it proactively provides analysis and data related to influence operations, foreign interference in information space and relevant incidents that emerges on its service, including through responding to ad-hoc requests for information by the European Commission and contributing to the development of the Crisis Response templates as part of the regular monitoring cycle of the Code. Microsoft's internal threat detection and research teams, including Digital Threat Analysis Center (DTAC), Microsoft Threat Intelligence Center (MSTIC), Microsoft Research (MSR), and Al For Good, collect and analyse data on actors of disinformation, misinformation and information manipulation across platforms. These teams work with external organisations and companies to share and ingest data that help support Microsoft product and service teams effectively respond to issues and threats.
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of	Yes
the implementation of this commitment? [Yes/No]	
the implementation of this communent: [res/No]	
If yes, which further implementation measures do you plan to	Planned Implementation Measures
put in place in the next 6 months?	

Microsoft looks forward to continuing the fruitful cooperation between Signatories in the context of the Task-
force's Crisis Response Subgroup, including the upcoming development of a risk-assessment methodology
and rapid response mechanism as set out in Commitment 37.

X. Monitoring of the Code				
Commitment 43  Signatories commit to produce reports and provide data following the harmonised reporting templates and refined methodology for reporting and data disclosure, as agreed in the Task-force				
If yes, list these implementation measures here .	New implementation Measures  Microsoft has provided its Baseline report in accordance with the Harmonised Reporting Template and underlying methodologies as jointly developed by Signatories in the Monitoring and Reporting Subgroup under the Code's Task-force.			
Do you plan to put further implementation measures in place in the next 6 months to substantially improve the maturity of the implementation of this commitment? [Yes/No]	Yes			
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures  Microsoft will continue its active engagement in the respective Task-force Subgroups to further develop and improve the Harmonised Reporting Template and underlying methodologies in view of its experience with reporting for the Baseline report and looks forward to the experiences of the other Signatories in this context.			

#### Commitment 44

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

In line with this commitment, did you deploy new	No
implementation measures (e.g. changes to your terms of	
service, new tools, new policies, etc)? [Yes/No]	
If yes, list these implementation measures here .	New implementation Measures
	As set out in the template of the Subscription document of the 2022 Code of Practice on Disinformation, signing up to the Commitments and Measures in the Code is without prejudice to designation of the relevant services as a Very Large Online Platform (VLOP) (or Very Large Online Search Engine (VLOSE)) under the Digital Services Act (DSA), nor does it imply that all Services provided by a Signatory - which may be categorised as VLOPs (or VLOSEs) - are in scope of the Code.
	Microsoft is in contact with the European Commission with regard to the VLOP and VLOSE designation process under the DSA, a process which is still ongoing at the moment of submission of the 2023 Baseline report.
Do you plan to put further implementation measures in place	Yes
in the next 6 months to substantially improve the maturity of	
the implementation of this commitment? [Yes/No]	
If yes, which further implementation measures do you plan to put in place in the next 6 months?	Planned Implementation Measures
	Subject to the outcome of the European Commission's VLOP and VLOSE designation process under the DSA,
	Microsoft looks forward to complying accordingly with its commitments under the Code for its subscribed
	services, LinkedIn, Bing Search and Microsoft Advertising.

# Reporting on the services' response during a period of crisis COVID-19 pandemic

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

#### COVID-19 pandemic

Overview of the main threats observed, such as crisis related disinformation campaigns, spread of misinformation, coordinated manipulative behaviours, malicious use of advertising products, involvement of foreign state actors, etc.: [suggested character limit: 2000 characters].

- **LinkedIn** is an online professional networking site with a real identity requirement, which means that content posted by our members is visible to that member's professional network, including colleagues, managers, and potential future employers. As a result of LinkedIn's professional context, our members do not tend to post misinformation, nor does misinformation content gain traction on LinkedIn. Nonetheless, LinkedIn may be subject to certain members posting misinformation during crisis situations.
- In its role as an online advertising network, **Microsoft Advertising** may be subject to the malicious use of its advertising services through either the spreading of misleading or deceptive advertising content or the funneling of advertising revenue to sites spreading Disinformation.
- **Bing Search** has observed instances of data void manipulation to show low-authority content to unsuspecting users related to COVID-19. This type of search algorithm manipulation could potentially lead to the spread of misinformation/disinformation.

Executive summary of the company's main strategies and actions taken to mitigate the identified threats and react to the crisis: [suggested character limit: 2000 characters].

- **LinkedIn** has numerous workstreams that address misinformation, particularly during crisis situations like COVID-19. During such a crisis, LinkedIn proactively provides members with trustworthy information through news storylines created by our in-house team of global news editors. We also showed banners that took members to this trustworthy information when our members searched for COVID-related terms. In addition, we remove misinformation related to COVID, and also update the applicable policies as needed. See, e.g., <a href="https://www.linkedin.com/help/linkedin/answer/a1340752">https://www.linkedin.com/help/linkedin/answer/a1340752</a>. Finally, we have multiple internal teams who ensure that both ads customers and state-sponsored actors do not exploit the crisis.
- Bing Search instituted a multi-pronged approach to respond to the COVID-19 pandemic, including (1) implementing defensive search interventions; (2) creation of a COVID-19 Information Hub so that users can access high authority information in one place with a high degree of visualisation; (3) direction of users to authoritative public health information sources; and (4) usage of highly visible public service announcements. While Bing does not determine whether a claim is true or false, we ingest third-party partners' authority signals and place interventions to prioritise authoritative URLs on topics that are highly likely to be exploited.
- **Microsoft Advertising** takes action against advertisements that contain disinformation about COVID-19 through its policies (listed below), including its misleading content policies which prohibits advertising that can "reasonably [be] perceived as being deceptive, fraudulent or harmful to site visitors." Based on this policy, at the onset of the crisis we prohibited all advertising that seeks to exploit the COVID-19 crisis for commercial gain, spreads misinformation, or that may pose a danger to user-health or safety. Microsoft Advertising approved a discrete number of COVID-related advertising in its network, including vetted vaccine or medical providers and NGOs. Microsoft Advertising requires our publishing partners to abide by strict brand safety-oriented policies to avoid providing revenue streams to websites engaging in misleading, deceptive, harmful, or insensitive behaviors. These policies include a comprehensive list of prohibited content that our ads cannot serve

against, including Disinformation. We require publishers to maintain a list of prohibited terms and provide us with information on their content management practices where applicable. In addition, we require publishers to abide by restrictions against engaging in business practices that are harmful to users. Microsoft Advertising reviews publisher properties and domains for compliance with these restrictions and promptly notifies publishers of properties or domains that violate Microsoft Advertising's policies. Microsoft does not approve properties that violate our policies for live ad traffic; if a property or domain that violates our policies is already live, we remove it from our ad network until the publisher remedies the issue. We also give advertisers the option to block their ads from being displayed on particular web domains.

Best practices identified for future crisis situations: [suggested character limit: 2000 characters].

- **LinkedIn** continues to mature its crisis response processes. In addition to the increase in resource allocation and process improvements, best practices include: 1) quickly coordinating with industry peers regarding the exchange of threat indicators; 2) engaging with external stakeholders regarding trends and TTPs; 3) continuously providing updated policy guidance to internal teams to assist with the removal of misinformation; and 4) continuing to proactively provide localised trustworthy information to our members.
- **Bing Search** considers measures discussed in this section to constitute best practices generally; however, the context and nature of a crisis (including the TTPs used in the spread of misinformation) will inform what mitigation measures are appropriate for a particular circumstance. Bing Search is reluctant to provide generalised suggestions, as each circumstance may warrant tailored approaches. With respect to public health crises, Bing believes that continued prioritisation of high authority information (and use of defensive search strategies to help ensure users are not exposed to low authority content absent intent to find such content) plays an important role as well as public service announcements, centralised information hubs (where warranted) and direction to authoritative public health sources.
- **Microsoft Advertising** applies the learnings and feedback into the platform and detection mechanisms to improve the ability to address future occurrences. Best practices include (i) multistakeholder coordination across industry and other experts, (ii) internal trainings and enforcement protocols, (iii) coordination with business partners, and (iv) partnership with leading experts to consume data and intel to aid detection.

Future measures planned within the next six months: [suggested character limit: 2000 characters].

- **LinkedIn** will continue to follow its processes related to the removal of misinformation.
- Bing Search will continue to monitor and evaluate the crisis and may modify its response as appropriate.
- Microsoft Advertising will continue monitoring the landscape to enforce its policies.

[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 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].

Changes in Policy Framework				
	Policies	Rationale		
	LinkedIn - None.	<b>LinkedIn</b> - Misinformation, disinformation campaigns, coordinated manipulative behaviours, malicious use of advertising products, and the involvement of foreign state actors, are all harms that existed prior to the COVID-19 crisis, and therefore LinkedIn already had policies in place to address these harms.		
Policies newly introduced for addressing the crisis	<b>Bing Search</b> - Bing Search has not introduced formal policies but has implemented the below measures to respond to the crisis. See below and QRE 22.7.1.	<b>Bing Search</b> - Since the start of the COVID-19 crisis, Bing Search has taken a number of measures to help promote high authority, high quality information and reliable information concerning the pandemic and public health measures in the EU as set forth below.		
	<b>Microsoft Advertising</b> - Microsoft Advertising released its <u>Information Integrity Policy</u> as part of its compliance actions in Section 2 (Scrutiny of Advertising) of this Code.	<b>Microsoft Advertising</b> - This revised policy enables Microsoft Advertising to iterate on its already existing policies to further prevent and remove disinformation-related content including false or misleading content that may cause public harm, or other similar behaviors.		
	LinkedIn - False or misleading content   LinkedIn Help	<b>LinkedIn</b> - LinkedIn continually updates its policies as appropriate during any crisis, including the COVID-19 crisis.		
Policies adapted for addressing the crisis	<b>Bing Search</b> - Bing Search has not adapted its policies for addressing the crisis but, in line with existing policies, has implemented the below measures in response. See below and QRE 22.7.1.	measures to help promote high authority, high quality information and reliable informati		
	Microsoft Advertising  - Sensitive Advertising Policies, upon which we reserve the right to remove or limit	<b>Microsoft Advertising -</b> Microsoft Advertising leverages these policies to prevent content monetisation related to sensitive or high-profile new events, and to remove or block ad content or sites spreading disinformation.		

advertisii	ng i	n re	sponse	to	а	sensitive
tragedy,	disa	ster,	death,	or	hig	gh-profile
news event,						

- Misleading Content Policies, which prohibits advertising content that is misleading, deceptive, fraudulent, or that may be harmful.
- Publishing partner policies include a comprehensive list of prohibited content that our ads cannot serve against, including Disinformation.

#### Actions to mitigate the crisis impact on the service

Type of mitigation	Intervention or action (short summary)	Intervention or action (explanation and implementation) [suggested character limit: 2000 characters]	Impact metrics
Actions taken against dis- and misinformation content (for example deamplification, labelling, removal etc.)	Intervention applied	Implementation and enforcement action(s) corresponding to Intervention	Performance Metrics (either as a subset of SLI 18.1.1. or 18.1.2. for the crisis context or other meaningful performance metrics available for the referenced intervention)

#### LinkedIn LinkedIn LinkedIn Removal of content, consequences for LinkedIn's Professional Community LinkedIn does not track misinformation content removal by the posting member. Policies prohibit misinformation, and subject matter, and a comprehensive listing of its misinformation is removed from the misinformation content takedowns is provided in this LinkedIn platform. disclosure and in its Transparency Report. See also SLI 18.2.1. Members that post misinformation are notified of LinkedIn's removal of their content. Members that repeatedly post misinformation are permanently restricted. State-sponsored attempts to post misinformation, if any, are removed. **Bing Search Bing Search Bing Search** Defensive search interventions, as Launched <u>a specialised COVID-19</u> The below data represents the number of monthly users and visitors to the Bing Search COVID-19 Information Hub. information hub providing centralised warranted news and country-specific data related "Monthly users" represents the total unique visitors who Creation and promotion of COVIDto the pandemic, including case rates, used this feature during the reporting period (December 1-19 Information Hub vaccine data, and COVID-19 related 31, 2022) ("Reporting Period"). "Monthly Visits" represents Direction of users to authoritative the total visitors from a member state during the Reporting news. public health information Period. Reliable information can be found near Public service announcements the top of search results pages and in sidebar windows. See also ORE 22.7.1. Reliable health information is provided Member Monthly States Users through public service announcements

pointing to authoritative third-party sources of health information (e.g., the

US Center For Disease Control and the

Monthly

**Visits** 

2,490

749

1,774

570

Austria

Belgium

World Health Organizat	ion) for certain	1.024	2 220	
COVID-19 queries, such	as for gueries	1,934	2,328	-
seeking information al	Croatia	0	0	-
symptoms.	Cyprus	0	0	
- In general, Bing Sea	rch prioritises Czech Republic	672	1,065	
trusted, high authority n		586	709	
has piloted algorith ("defensive search") to	I I Ectonia	649	754	
reliable information al	· · ·	4,522	5,385	
and pandemic related in	formation. France	14,189	18,961	
See also QRE 22.7.1.	Germany	24,277	40,949	
	Greece	1,471	2,006	
	Hungary	714	962	
	Ireland	11,097	11,429	
	Italy	17,586	23,943	
	Latvia	783	971	
	Lithuania	880	978	
	Luxembourg	221	251	
	Malta	0	0	
	Netherlands	6,840	7,523	
	Poland	27,252	33,136	
	Portugal	14,482	17,406	
	Romania	15,132	25,224	
	Slovakia	1,097	1,199	
	Slovenia	1,170	1,275	
	Spain	21,224	26,810	

		Sweden Iceland Liechtenstein Norway Total EU Total EEA	18,788 281 0 4 187,910 188,195	21,949 331 0 7 248,452 248,790	-
Microsoft Advertising	Microsoft Advertising	See also SLI 22.7.1.  Microsoft Advert			
Ad content and sites blocks or removal, customer account suspension.	Microsoft Advertising policies prohibit ads and sites associated to Disinformation. We employ both proactive and reactive mechanisms to enforce our policies by:  - Preventing advertising that seeks to exploit the COVID-19 crisis for commercial gain, spreads Disinformation, or that may pose a danger to user-health or safety.  - Removing, upon escalation, advertiser submissions directly related to COVID-19 from serving to its users globally.  Blocking ads serving on sites removal spreading Disinformation or otherwise violating required content management practices.	Microsoft Advertise 5,029,409 advertise 19 (including vacc globally, 2,307,624 users in European Advertising remo advertiser submiss serving to its user markets. The aver September 2022 p	er submissions dine-related) froi l of which woun n markets. Upo ved a month tions directly re s globally, 21,02 rages are calcu	lirectly related to m being served ld have been so on escalation, I ly average of lated to COVID 20 of which in I	to users served to Microsoft f 39,956 1-19 from European

Promotion of authoritative information, including via	Source promoted, Product deployed or Initiative taken	Implementation measures	Performance Metrics (either as a subset of SLI 18.2.1. or 22.7.1. for the crisis context, or other meaningful performance metrics available for the referenced intervention)
systems and products and features such as banners and panels	LinkedIn Editorial storylines and search banners	LinkedIn  LinkedIn has an internal team of global news editors that provides trustworthy and authoritative content to its member-base at all times. During the COVID-19 crisis, this team provided manually curated and localised storylines. When members searched for COVID-19 related terms, LinkedIn displayed a search banner that pointed members to this content.	LinkedIn  LinkedIn no longer actively promotes COVID-19 storylines, and therefore does not have associated metrics.
	Microsoft Advertising  Not relevant to Microsoft Advertising. We it in place and merely alert users about	•	tem contains Disinformation, we remove it (rather than leave
	Bing Search  Defensive search interventions, as warranted  COVID-19 Information Hub  Direction of users to authoritative public health information  Providing public service announcements  See also QRE 22.7.1.	Bing Search  Although Bing Search is not a recommender system, it has launched the below product features to assist users in finding reliable information:  1. Launched a specialised COVID-19 information hub providing centralised news and country-specific data related to the pandemic, including case rates,	Bing Search  The below data represents the number of monthly users and visitors to the Bing Search COVID-19 Information Hub. "Monthly users" represents the total unique visitors who used this feature during the reporting period (December 1-31, 2022) ("Reporting Period"). "Monthly Visits" represents the total visitors from a member state during the Reporting Period.

2.	vaccine data, and COVID-19 related news. Reliable information can be found near the top of search results	Member States	Monthly Users	Monthly Visits
_	pages and in sidebar windows.	Austria	1,774	2,490
3.	Reliable health information is provided through public service	Belgium	570	749
	announcements pointing to	Bulgaria	1,934	2,328
	authoritative third party sources of	Croatia	0	0
	health information (e.g., the US Center For Disease Control and the	Cyprus	0	0
	World Health Organization) for	Czech Republic	672	1,065
	certain COVID-19 queries, such as	Denmark	586	709
	for queries seeking information about COVID-19 symptoms	Estonia	649	754
4.	Bing Search prioritises trusted,	Finland	4,522	5,385
	high authority news sources and	France	14,189	18,961
	has piloted defensive search measures to help promote reliable	Germany	24,277	40,949
	information about COVID-19 and	Greece	1,471	2,006
	pandemic related information.	Hungary	714	962
See also	QRE 22.7.1.	Ireland	11,097	11,429
		Italy	17,586	23,943
		Latvia	783	971
		Lithuania	880	978
		Luxembourg	221	251
		Malta	0	0
		Netherlands	6,840	7,523
		Poland	27,252	33,136

	T	<u></u>				
			Portugal	14,482	17,406	
			Romania	15,132	25,224	
			Slovakia	1,097	1,199	
			Slovenia	1,170	1,275	
			Spain	21,224	26,810	
			Sweden	18,788	21,949	
			Iceland	281	331	
			Liechtenstein	0	0	
			Norway	4	7	
			Total EU	187,910	248,452	
			Total EEA	188,195	248,790	
			See also SLI 22.7.	1.		
Cooperation with independent fact-checkers in the crisis context, including coverage in the EU	Implementation measure (Agreement with fact-checker in Member state)	Approach of cooperation with Fact-checkers in specific country	Performance Metr 30.1.1., 31.1.1., 31. meaningful perfor intervention)	.1.2., or 32.1.1. for	the crisis contex	t or other

	LinkedIn	LinkedIn	LinkedIn
	Fact-checking agreements	LinkedIn works with globally-recognised fact-checkers to receive their independent judgment regarding user-generated content. Content that violates LinkedIn's Professional Community Policies, including misinformation, is removed.	LinkedIn does not separately track COVID-19-related content sent to external fact checkers. Further detail regarding content sent to fact checkers is available at SLI 21.1.1, 30.1.1 and 31.1.1.
	Microsoft Advertising  Not relevant to Microsoft Advertising.		
	Bing Search	Bing Search	Bing Search
	Bing Search utilises the ClaimReview open protocol to ingest fact checks into search results. See QRE 22.7.1 and QRE 21.1.1 for further information.	As discussed further in QRE 22.7.1, Bing Search relies on independent fact checkers around the world to incorporate schema.org ClaimReview tags into their content so that fact check content is identified within search results. However, the specific nature of a fact check article (e.g., relating to COVID-19 or a particular election) is not available to Bing Search when ingesting fact check labels	Bing Search cannot provide data on fact check coverage specific to this crisis, as fact check labels are created by third parties and are not "tagged" as pertaining to a specific topic when ingested by Bing Search.
Measures taken to demonetise disinformation	Intervention applied	Implementation measures	Performance Metrics (either as a subset of SLI 1.1.1., 1.2.1. for the crisis context or other meaningful performance metrics available for the referenced intervention)
related to the crisis	LinkedIn	LinkedIn	LinkedIn
	Not applicable	LinkedIn does not pay its members for creating content, other than in rare instances where we individually select and	None.

		manage a small group of content creators to create professionally-relevant content.						
	Microsoft Advertising							
	Please see responses to "Actions taken against dis- and misinformation content" above.							
	Bing Search							
	Not relevant to Bing Search.							
Measures taken to prevent malicious advertising	Intervention applied	Implementation measure	Performance metrics (either as a subset of SLI 2.1.1., 2.3.1., 2.4.1. for the crisis context or other meaningful performance metrics available for the referenced intervention)					
	LinkedIn	LinkedIn	LinkedIn					
	Manual review	LinkedIn maintains a robust ad-review process wherein ads related to crises, including COVID-19, are manually reviewed and approved by our internal team.	See SLI 2.1.1 and 2.3.1.					
	Microsoft Advertising  Please see responses to "Actions taken against dis- and misinformation content" above.							
	Bing Search  Not relevant to Bing Search.							
Measures taken in the context of the crisis to counter manipulative behaviours/TTPs	Intervention applied	Implementation measures	Performance metrics (either as a subset of SLI 14.1.1., 14.2.1., 14.2.2., 14.2.3., 14.2.4. for the crisis context or other meaningful performance metrics available for the referenced intervention)					

	LinkedIn	LinkedIn	LinkedIn
	Industry cooperation	LinkedIn regularly meets with and exchanges information with industry peers to identify and share granular information related to manipulative behaviours, coordinated influence operations, and TTPs. All such content that violates LinkedIn's Professional Community Policies is removed.	See SLI 14.1.1 and 14.2.1.
	Microsoft Advertising		
	Not relevant to Microsoft Advertising.		
	Bing Search	Bing Search	Bing Search
	Defensive search interventions, as warranted. <i>See</i> also QRE 22.7.1 and QRE 14.1.1-2.	Bing Search prioritises trusted, high authority news sources and has piloted defensive search measures to help promote reliable information about COVID-19 and pandemic related information. See also QRE 22.7.1 and QRE 14.1.1-2.	See SLI 22.7.1 and 14.2.1.
Measures taken to	Program supported	Implementation measures	Performance Metrics (either as a subset of SLI 26.1.1., 26.2.1.
support research into			or 27.3.1. for the crisis context or other meaningful
crisis related misinformation and			performance metrics available for the referenced intervention)
disinformation	Microsoft Corporation	Microsoft Corporation	uner ventiony
	Detection and Research efforts and sharing	Microsoft's internal threat detection and research teams, including Digital Threat Analysis Center (DTAC), Microsoft Threat Intelligence Center (MSTIC), Microsoft Research (MSR), and Al For Good, collect	

		and analyse data on actors of disinformation, misinformation and information manipulation. These teams	
		work with external organisations and companies to share and ingest data that help support Microsoft product and service teams effectively respond to issues and	
		threats.	
	LinkedIn	LinkedIn	LinkedIn
-	None.	None.	None.

## **Microsoft Advertising**

Not relevant to Microsoft Advertising.

## **Bing Search**

- COVID-19 Information Hub, discussed further at QRE 22.7.1.
- Release of Coronavirus Intent search query dataset, discussed further at QRE 26.1.1

## **Bing Search**

- 1. Bing Search launched a specialised COVID-19 information hub providing centralised news and country-specific data related to the pandemic, including case rates, vaccine data, and COVID-19 related news. Data can be sorted by each EU member state to provide a personalised experience
- 2. In 2020, Bing Search made <u>a search</u>
  <u>dataset for Coronavirus Intent</u>
  comprised of queries from all over
  the world that had an intent
  related to the Coronavirus or

## **Bing Search**

**COVID-19 Info Hub:** The below data represents the number of monthly users and visitors to the Bing Search COVID-19 Information Hub. "Monthly users" represents the total unique visitors who used this feature during the reporting period (1-31 December 2022) ("Reporting Period"). "Monthly Visits" represents the total visitors from a member state.

Member States	Monthly Users	Monthly Visits
Austria	1,774	2,490
Belgium	570	749
Bulgaria	1,934	2,328

COVID-19 (e.g., searches for
"Coronavirus updates Seattle" or
"Shelter in place") publicly
available for use by researchers
and the public. This data, which is
divisible by country, is particularly
relevant to misinformation
research on public health issues
and the COVID-19 pandemic, as it
provides insights into how users
sought information related to
COVID-19 during the pandemic.
The dataset was also posted to
Azure Open datasets for Machine
Learning, <u>Tensorflow.org</u> and
<u>Kaggle.</u> See additional information
on the dataset at <b>Extracting</b>
COVID-19 insights from Bing
Search data   Bing Search Blog. This
dataset has already been used by
the disinformation research
community.

See QRE 22.7.1 and QRE 26.1.1 for further information.

Croatia	0	0
Cyprus	0	0
Czech Republic	672	1,065
Denmark	586	709
Estonia	649	754
Finland	4,522	5,385
France	14,189	18,961
Germany	24,277	40,949
Greece	1,471	2,006
Hungary	714	962
Ireland	11,097	11,429
Italy	17,586	23,943
Latvia	783	971
Lithuania	880	978
Luxembourg	221	251
Malta	0	0
Netherlands	6,840	7,523
Poland	27,252	33,136
Portugal	14,482	17,406
Romania	15,132	25,224
Slovakia	1,097	1,199
Slovenia	1,170	1,275
Spain	21,224	26,810
Sweden	18,788	21,949

			Iceland	281	331	
			Liechtenstein	0	0	
			Norway	4	7	
			Total EU	187,910	248,452	
			Total EEA	188,195	248,790	
			See also SLI 22.7.1			
			Coronavirus Inte	nt Search Data	aset:	
			Because the reledataset predates without tracking metrics at this downloaded or refigures. Microsoft for its many pudatasets. Bing Seafor this Commitmed Page Views for Beriod) on MSR (Downloads of Biperiod) on MSR (Downloads of MSR)	the CoP and vertices and the copy and vertices working on ablicly accessible arch hopes to the copy and copy and copy arch to the copy and copy arch to the copy and copy arch to the copy arch t	was provided on Microsoft does of often the dates esearch beyond nadequate usago ole researcher provide addition report.	not have not have staset was the below ge tracking tools and nal metrics
Relevant changes to	Changes to working practices	Actions carried out	Any available mea	ningful metrics	for the reference	ed changes
working practices to respond to the	LinkedIn	LinkedIn	LinkedIn			
demands of the crisis situation and/or additional human	Continual increase in resource allocation and process improvements	LinkedIn has continued to mature its crisis response playbook by continually	None.			

resources procured for the mitigation of the crisis		monitoring crisis situations globally, expanding internal teams that work on crisis response, and maturing our processes to respond more efficiently and effectively to crisis situations.	
	Microsoft Advertising	Microsoft Advertising	Microsoft Advertising
	Re-allocation of resources and policy/process improvements.	Microsoft Advertising cooperates with relevant industry groups and peers to address crisis, as applicable.	None.
	Bing Search	Bing Search	Bing Search
	Bing Search continues to monitor and evaluate the crisis but has not determined a need to add additional headcount or modify working practices to adequately respond to the crisis.	N/A	N/A

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

War of aggression by Russia on Ukraine

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

# War of aggression by Russia on Ukraine

Overview of the main threats observed, such as crisis related disinformation campaigns, spread of misinformation, coordinated manipulative behaviours, malicious use of advertising products, involvement of foreign state actors, etc.: [suggested character limit: 2000 characters].

- **LinkedIn** is an online professional networking site with a real identity requirement, which means that content posted by our members is visible to that member's professional network, including colleagues, managers, and potential future employers. As a result of LinkedIn's professional context, our members do not tend to post misinformation, nor does misinformation content gain traction on LinkedIn. Nonetheless, LinkedIn may be subject to certain members posting misinformation during crisis situations.
- In its role as an online advertising network, **Microsoft Advertising** may be subject to the malicious use of its advertising services through either the spreading of misleading or deceptive advertising content or the funneling of advertising revenue to sites spreading Disinformation.
- **Bing Search** has observed instances of data void manipulation to show low-authority content to unsuspecting users related to Russia's war against Ukraine. This type of search algorithm manipulation could potentially lead to the spread of misinformation/disinformation.

Executive summary of the company's main strategies and actions taken to mitigate the identified threats and react to the crisis: [suggested character limit: 2000 characters].

- **Microsoft**'s Digital Threat Analysis Center (DTAC) team closely tracks cyber-enabled influence operations. DTAC analysts focused on Europe/Eurasia report on a wide range of Russian influence tactics used to malign or diminish support for Ukraine: propaganda and disinformation published across different languages; people-to-people and party-to-party engagement; real-world provocations; and those that blend cyber and influence activity, like hack-and-leak campaigns. DTAC's work includes analysing the ways these methods are leveraged to target audiences in Central and Eastern Europe.
- In June of this year, Microsoft issued its "Defending Ukraine" report detailing the relentless and destructive Russian cyberattacks and influence operations, that we have directly observed in the hybrid war Russia is waging against Ukraine. In a follow up report issued in early December, Microsoft has further detailed its observations that the Russian attacks on Ukraine and allied countries rely in part on a cyber strategy that includes at least three distinct and sometimes coordinated efforts destructive cyberattacks within Ukraine, network penetration and espionage outside Ukraine, and cyber influence operations targeting audiences in Europe to fuel real-world discord. The report specifically highlights Russian influence operations targeting European populations—such as audiences in Italy, Czech Republic, and Germany, among others—using different influence levers, including propaganda campaigns, to amplify organic, local dissent and diminish support for Ukraine.
- Microsoft has in addition supported nonprofits, journalists, and academics both within Ukraine and across allies, allowing those partners to broaden their defense of the information ecosystem. For example, Microsoft recently partnered with International Media Support (IMS) and the Center for Strategic Communication and Information Security within Ukraine to improve rapid information sharing and response between the private sector, NGOs, and journalists within Ukraine through a dedicated secure communications hub.

- **LinkedIn**'s Professional Community Policies explicitly disallow disinformation and misinformation, and its in-house Editorial team provides members with trustworthy content regarding global events, including the Russia's war against Ukraine. LinkedIn has an internal team of hundreds of content reviewers located all over the world (for 24/7 coverage), approximately 280 of which are located in the EU, and includes specialists in a number of languages including English, German, French, Russian, and Ukrainian. These reviewers use policies and guidance developed by a dedicated content policy team and experienced lawyers, and work with external fact checkers as needed. When LinkedIn sees content or behaviour that violates its Professional Community Policies, it takes action, including the removal of content or the restriction of an account for repeated abusive behaviour. LinkedIn has been banned in Russia since 2016 and has implemented the European bans on Russian state media. In addition to not operating in Russia, political ads are banned on LinkedIn, which includes prohibitions on ads that exploit a sensitive political issue, including Russia's current war against Ukraine. LinkedIn also does not provide a mechanism for content creators to monetise the content they post on LinkedIn.
- **Bing Search** To respond to the crisis, Bing Search has implemented the following measures: (1) Defensive search interventions; (2) regular direction of users to high authority, high quality sources; (3) removed auto suggest and related search terms considered likely to lead users to low authority content; and (4) partnered with research and nonprofit organisations to maintain threat intelligence and inform potential algorithmic interventions.
- **Microsoft Advertising** has not seen any significant traffic or recently received escalations or takedown requests related to the Ukrainian crisis. Microsoft Advertising is preventing serving advertising related to the Ukrainian crisis pursuant to its Sensitive Advertising Policies. Under this policy, Microsoft Advertising reserves the right to remove or limit advertising in response to a sensitive or high-profile news event to prevent the commercial exploitation of such events and to ensure user safety. Furthermore, our Misleading Content Policies prohibit advertising content that is misleading, deceptive, fraudulent, or that can be harmful to its users, including advertisements spreading disinformation. Microsoft Advertising requires its syndication partners (i.e., those partners that display our advertisements on their services) to abide by strict brand safety-oriented policies to avoid providing revenue streams to websites engaging in misleading, deceptive, harmful, or insensitive behaviours. Our publisher policies include a comprehensive list of prohibited content that ads cannot serve against, including, but not limited to, sensitive political content (e.g., extreme, aggressive, or misleading interpretations of news, events, or individuals), and unsavory content (such as content disparaging individuals or organisations). Partner properties that violate our policies are removed from our network until the partner remedies the issue. Microsoft Advertising banned all advertisements from the media outlets Russia Today (RT) and Sputnik across our ad network and will not place any ads from our ad network on these sites. Since February 2022, we blocked 2,321 domains from our network.

Best practices identified for future crisis situations: [suggested character limit: 2000 characters].

- **LinkedIn** continues to mature its crisis response processes. In addition to the increase in resource allocation and process improvements, best practices include: 1) quickly coordinating with industry peers regarding the exchange of threat indicators; 2) engaging with external stakeholders regarding trends and TTPs; 3) continuously providing updated policy guidance to internal teams to assist with the removal of misinformation; and 4) continuing to proactively provide localised trustworthy information to our members.
- **Microsoft Advertising** applies the learnings and feedback into the platform and detection mechanisms to improve the ability to address future occurrences. Best practices include (i) multistakeholder coordination across industry and other experts, (ii) internal trainings and enforcement protocols, (iii) coordination with business partners, and (iv) partnership with leading experts to consume data and intel to aid detection.

- **Bing Search** considers measures discussed in this section to constitute best practices generally; however, the context and nature of a crisis (including the TTPs used in the spread of misinformation) will inform what mitigation measures are appropriate for a particular circumstance. Bing Search is reluctant to provide generalised suggestions, as each circumstance may warrant tailored approaches.

Future measures planned within the next six months: [suggested character limit: 2000 characters].

- **LinkedIn** will continue to follow its processes related to the removal of misinformation.
- Microsoft Advertising will continue monitoring the landscape to enforce its policies.
- Bing Search will continue to monitor and evaluate the crisis and may modify its response as appropriate.

[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 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].

	Changes in Policy Framework				
	Policies	Rationale			
Policies newly introduced for addressing the crisis	LinkedIn None.	LinkedIn  Misinformation, disinformation campaigns, coordinated manipulative behaviours, malicious use of advertising products, and the involvement of foreign state actors, are all harms that existed prior to Russia's war against Ukraine, and therefore LinkedIn already had policies in place to address these harms.			
	Microsoft Advertising  Microsoft Advertising released its <u>Information Integrity Policy</u> as part of its compliance actions in Section 2 of this Code.	Microsoft Advertising  This revised policy enables Microsoft Advertising to iterate on its already existing policies to further prevent and remove			

		disinformation-related content, including false or misleading content that may cause public harm, or other similar behaviors.
	Bing Search	Bing Search
	Bing Search has not introduced new formal policies but has implemented the below measures to respond to the crisis. See below and QRE 22.7.1.	Since the start of the Russian invasion of Ukraine, Bing Search has taken a number of measures to help promote high authority, high quality information and reliable information concerning this crisis, which are detailed further below.
Policies adapted for	LinkedIn	LinkedIn
addressing the crisis	False or misleading content   LinkedIn Help	LinkedIn continually updates its policies as appropriate during any crisis, including Russia's war against Ukraine.
	Microsoft Advertising	Microsoft Advertising
	<ul> <li>Sensitive Advertising Policies, upon which we reserve the right to remove or limit advertising in response to a sensitive tragedy, disaster, death, or high-profile news event,</li> <li>Misleading Content Policies, which prohibits advertising content that is misleading, deceptive, fraudulent, or that may be harmful.</li> <li>Publishing partner policies include a comprehensive list of prohibited content that our ads cannot serve against, including Disinformation.</li> </ul>	Microsoft Advertising leverages these policies to prevent content monetisation related to sensitive or high-profile new events, and to remove or block ad content or sites spreading disinformation.
	Bing Search	Bing Search
	Bing Search has not adapted its policies for addressing the crisis but, in line with existing policies, has implemented the below measures in response. See below and QRE 22.7.1.	Since the start of the Russian invasion of Ukraine, Bing Search has taken a number of measures to help promote high authority, high quality information and reliable information concerning this crisis, which are detailed further below.

Actions to mitigate the crisis impact on the service				
Type of mitigation	Intervention or action (short summary)	Intervention or action (explanation and implementation) [suggested character limit: 2000 characters]	Impact metrics	
Actions taken against disand misinformation content (for example deamplification, labelling, removal etc.)	Intervention applied	Implementation and enforcement action(s) corresponding to Intervention	Performance Metrics (either as a subset of SLI 18.1.1. or 18.1.2. for the crisis context or other meaningful performance metrics available for the referenced intervention)	
Temovar etc.)	LinkedIn	LinkedIn	LinkedIn	
	Removal of content, consequences for the posting member.	LinkedIn's Professional Community Policies prohibit misinformation, and misinformation is removed from the LinkedIn platform.  Members that post misinformation are notified of LinkedIn's removal of their content. Members that repeatedly post misinformation are permanently restricted.  State-sponsored attempts to post misinformation, if any, are removed.	LinkedIn does not track misinformation content removal by subject matter, and a comprehensive listing of its misinformation content takedowns is provided in this disclosure and in its Transparency Report. See also SLI 18.2.1.	
	Microsoft Advertising	Microsoft Advertising	Microsoft Advertising	
	Ad content and sites blocks or removal, customer account suspension.	Microsoft Advertising policies prohibit ads and sites associated to Disinformation. We employ both proactive and reactive mechanisms to enforce our policies by:	Between February and December 2022 we prevented about 25,000 advertiser submissions relating to the Ukrainian crisis globally and removed 2,328 domains from our network.	

	<ul> <li>Preventing or taking down advertiser submissions related to Russia's war against Ukraine.</li> <li>Blocking or removing domains associated with Disinformation across the ad network.</li> <li>Banning all advertisements from media outlet or domains (including state-sponsored) associated to Disinformation, including by not placing any ads from our ad network on these sites to disrupt monetisation.</li> </ul>	
Bing Search	Bing Search	Bing Search
<ul> <li>Defensive search interventions</li> <li>Direction of users to high authority, high quality sources</li> <li>Remove auto suggest and related search terms considered likely to lead users to low authority content</li> <li>Partnership with research and nonprofit organisations to maintain threat intelligence and inform potential algorithmic interventions.</li> <li>See also QRE 22.7.1.</li> </ul>	<ol> <li>Bing Search has taken steps to algorithmically boost authority signals and has downgraded less authoritative information (see SLI 22.7.1). These queries are translated automatically into other languages supported by Bing Search.</li> <li>Bing Search regularly partners with independent research organisations and nonprofit organisations to maintain threat intelligence and inform potential algorithmic interventions.</li> <li>Bing Search also takes action to remove autosuggest and related search terms that have been found likely to lead users to low authority</li> </ol>	During the reporting period (Dec. 1-31, 2022), Bing Search took defensive actions on at least 600,000 different queries related to this crisis, resulting in 5.7 million impressions.  See also SLI 22.7.1.

content.

		4. Bing Search continues to partner with fact checking organisations and apply fact check labels to help users understand the context and trustworthiness of certain content in the EU.  5. These measures have helped ensure that Bing Search is promoting authoritative news sources, timelines, and other factual information at the top of algorithmic search results.  See also QRE 22.7.1.	
Promotion of authoritative information, including via recommender systems and products and features such	Source promoted, Product deployed or Initiative taken	Implementation measures	Performance Metrics (either as a subset of SLI 18.2.1. or 22.7.1. for the crisis context, or other meaningful performance metrics available for the referenced intervention)
as banners and panels	LinkedIn Editorial storylines and search banners	LinkedIn  LinkedIn has an internal team of global news editors that provides trustworthy and authoritative content to its member-base at all times. During Russia's war against Ukraine, this team provided manually curated and localised storylines. When members searched for Ukraine related terms, LinkedIn displayed a search banner that pointed members to this content.	LinkedIn LinkedIn no longer actively promotes Ukraine storylines, and therefore does not have associated metrics.

## **Microsoft Advertising**

Not relevant to Microsoft Advertising. When we learn that an advertisement on our system contains Disinformation, we remove it (rather than leave it in place and merely alert users about the Disinformation it contains).

### **Bing Search**

- Defensive search interventions
- Direction of users to high authority, high quality sources
- Remove auto suggest and related search terms considered likely to lead users to low authority content
- Partnership with research and nonprofit organisations to maintain threat intelligence and inform potential algorithmic interventions.

See also QRE 22.7.1.

#### **Bing Search**

- Bing Search has taken steps to algorithmically boost authority signals and has downgraded less authoritative information (see SLI 22.7.1). These queries are translated automatically into other languages supported by Bing Search.
- Bing Search regularly partners with independent research organisations and nonprofit organisations to maintain threat intelligence and inform potential algorithmic interventions.
- Bing Search also takes action to remove autosuggest and related search terms that have been found likely to lead users to low authority content.
- 4. Bing Search continues to partner with fact checking organisations and apply fact check labels to help users understand the context and trustworthiness of certain content in the EU.
- 5. These measures have helped ensure that Bing Search is promoting

#### **Bing Search**

During the reporting period (Dec. 1-31, 2022), Bing Search took defensive actions on at least 600,000 different queries related to this crisis, resulting in 5.7 million impressions.

See also SLI 22.7.1.

		authoritative news sources, timelines, and other factual information at the top of algorithmic search results.  See also QRE 22.7.1.	
Cooperation with independent fact-checkers in the crisis context, including coverage in the EU	Implementation measure (Agreement with fact-checker in Member state)	Approach of cooperation with Fact-checkers in specific country	Performance Metrics (either as a subset of SLI 21.1.1., 21.1.2., 30.1.1., 31.1.1., 31.1.2., or 32.1.1. for the crisis context or other meaningful performance metrics available for the referenced intervention)
	LinkedIn	LinkedIn	LinkedIn
	Fact-checking agreements	LinkedIn works with globally-recognised fact-checkers to receive their independent judgment regarding user-generated content. Content that violates LinkedIn's Professional Community Policies, including misinformation, is removed.	LinkedIn does not separately track Ukraine-related content sent to external fact checkers. Further detail regarding content sent to fact checkers is available at SLI 21.1.1, 30.1.1, and 31.1.1.
	Microsoft Advertising		
	Not relevant to Microsoft Advertising.		
	Bing Search	Bing Search	Bing Search
	Bing utilises the ClaimReview open protocol to ingest fact checks into search results. See QRE 22.7.1 and QRE 21.1.1 for further information.	As discussed further in QRE 22.7.1, Bing relies on independent fact checkers around the world to incorporate schema.org ClaimReview tags into their content so that fact check content is identified within search results. However, the specific nature of a fact	Bing Search cannot provide data on fact check coverage specific to this crisis, as fact check labels are created by third parties and are not "tagged" as pertaining to a specific topic when ingested.

		check article (e.g., relating to COVID-19 or a particular election) is not available to Bing Search when ingesting fact check labels.	
Measures taken to demonetise disinformation related to the crisis	Intervention applied	Implementation measures	Performance Metrics (either as a subset of SLI 1.1.1., 1.2.1. for the crisis context or other meaningful performance metrics available for the referenced intervention)
	LinkedIn	LinkedIn	LinkedIn
	Not applicable.	LinkedIn does not pay its members for creating content, other than in rare instances where we individually select and manage a small group of content creators to create professionally-relevant content.	None.
	Microsoft Advertising  Please see responses to "Actions taken agains	t dis- and misinformation content" above	
	Bing Search	Bing Search	Bing Search
	Not applicable.	Not applicable.	Not applicable.
Measures taken to prevent malicious advertising	Intervention applied	Implementation measure	Performance metrics (either as a subset of SLI 2.1.1., 2.3.1., 2.4.1. for the crisis context or other meaningful performance metrics available for the referenced intervention)
	LinkedIn	LinkedIn	LinkedIn
	Manual review.	LinkedIn maintains a robust ad-review process wherein ads related to crises, including Russia's war against Ukraine, are	See SLI 2.1.1 and 2.3.1.

	Microsoft Advertising Please see responses to "Actions taken agains"	manually reviewed and approved by our internal team.  t dis- and misinformation content" above.	
	Bing Search	Bing Search	Bing Search
	Not applicable.	Not applicable.	Not applicable.
Measures taken in the context of the crisis to counter manipulative behaviours/TTPs	Intervention applied	Implementation measures	Performance metrics (either as a subset of SLI 14.1.1., 14.2.1., 14.2.2., 14.2.3., 14.2.4. for the crisis context or other meaningful performance metrics available for the referenced intervention)
	LinkedIn	LinkedIn	LinkedIn
	Industry cooperation .	LinkedIn regularly meets with and exchanges information with industry peers to identify and share granular information related to manipulative behaviours, coordinated influence operations, and TTPs. All such content that violates LinkedIn's Professional Community Policies is removed.	See SLI 14.1.1 and 14.2.1.
	Microsoft Advertising		
	Not relevant to Microsoft Advertising.		
	Bing Search	Bing Search	Bing Search
	<ul> <li>Defensive search interventions</li> <li>Partnership with research and nonprofit organisations to maintain</li> </ul>	Bing Search has taken steps to algorithmically boost authority	During the reporting period (1-31 December 2022), Bing Search took defensive actions on

		T		
	threat intelligence and inform	_	als and has downgraded less	at least 600,000 different queries related to
	potential algorithmic interventions.		oritative information (see SLI	this crisis, resulting in 5.7 million
	See also QRE 22.7.1 and QRE 14.1.1-2.		1). These queries are translated	impressions.
			matically into other languages	See also SLI 22.7.1 and 14.2.1.
			orted by Bing Search.	
		_	Search regularly partners with	
			pendent research organisations	
		and i	nonprofit organisations to	
		main	tain threat intelligence and	
		infor	m potential algorithmic	
			ventions.	
		<i>3</i> . Bing	Search also takes action to	
			ove autosuggest and related	
			th terms that have been found	
		likely	to lead users to low authority	
		conte	ent.	
		See above and	d QRE 22.7.1 and QRE 14.1.1-2.	
Measures taken to support	Program supported	Implementatio	on measures	Performance Metrics (either as a subset of SLI
research into crisis related				26.1.1., 26.2.1. or 27.3.1. for the crisis context
misinformation and				or other meaningful performance metrics
disinformation				available for the referenced intervention)
1	1	ı		

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	Microsoft Corporation	Microsoft Corporation	
	Detection and Research efforts and sharing	Microsoft's internal threat detection and	
		research teams, including Digital Threat	
		Analysis Center (DTAC), Microsoft Threat	
		Intelligence Center (MSTIC), Microsoft	
		Research (MSR), and Al For Good, collect and	
		analyse data on actors of disinformation,	
		misinformation and information	
		manipulation. These teams work with	
		external organisations and companies to share and ingest data that help support	
		Microsoft product and service teams	
		effectively respond to issues and threats.	
		effectively respond to issues and timeats.	
	LinkedIn	LinkedIn	LinkedIn
	LinkedIn None.	LinkedIn  None.	LinkedIn  None.
	None.		
	None.  Microsoft Advertising		
	None.  Microsoft Advertising		
	None.  Microsoft Advertising  Not relevant to Microsoft Advertising.	None.	None.
	None.  Microsoft Advertising  Not relevant to Microsoft Advertising.  Bing Search	None.  Bing Search	None.  Bing Search
	None.  Microsoft Advertising  Not relevant to Microsoft Advertising.  Bing Search  See QRE 26.1.1 for general research support.	None.  Bing Search	None.  Bing Search
Relevant changes to	None.  Microsoft Advertising  Not relevant to Microsoft Advertising.  Bing Search  See QRE 26.1.1 for general research support.  Bing Search has not made datasets available pertaining specifically to this crisis.	None.  Bing Search	None.  Bing Search See SLI 22.7.1.
Relevant changes to working practices to	None.  Microsoft Advertising  Not relevant to Microsoft Advertising.  Bing Search  See QRE 26.1.1 for general research support.  Bing Search has not made datasets available	None.  Bing Search Not applicable.	None.  Bing Search

respond to the demands of the crisis situation and/or additional human resources procured for the mitigation of the crisis	LinkedIn  Continual increase in resource allocation and process improvements	LinkedIn  LinkedIn has continued to mature its crisis response playbook by continually monitoring crisis situations globally, expanding internal teams that work on crisis response, and maturing our processes to respond more efficiently and effectively to crisis situations.	LinkedIn  None.
	Microsoft Advertising  Re-allocation of resources and policy/process improvements.	Microsoft Advertising  Microsoft Advertising cooperates with relevant industry groups and peers to address crisis, as applicable.	Microsoft Advertising None.
	Bing Search  Bing Search continues to monitor and evaluate the crisis but has not determined a need to add additional headcount or modify working practices to adequately respond to the crisis.	Bing Search  Not applicable.	Bing Search  Not applicable.