Code of Practice on Disinformation – Report of NEWSGUARD for the period June 22, 2022 – January 16, 2023

Executive summary

In June 2022, NewsGuard became a signatory of the European Union's Strengthened Code of Practice on Disinformation.

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

Here is a summary of how we implemented our commitments.

1. EMPOWERING USERS

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

Our criteria are basic journalistic principles and are inherently apolitical. They are also completely transparent and explained in great detail on our website, along with the relative weighting of each criterion, depending on its importance.

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

To ensure fairness, publishers are also put at the center of our rating process and given a chance to comment whenever our team flags an issue with the credibility or transparency of their site.

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

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

Finally, to ensure complete independence, we accept no fees from the news websites we rate. Our revenue comes from license fees that platforms, ad agencies, brands, media monitoring companies, and researchers — among other groups — pay to use our data.

From June 2022 to January 2023, NewsGuard participated in several media literacy seminars and awareness-raising events in the following EU countries: France, Italy, and Finland. These events reached a total of approximately 740 participants, including educators and librarians who in turn could reach hundreds of students and library users.

NewsGuard has also provided its media literacy browser extension for free to approximately 100 public libraries in the EU (in Slovenia, Italy, France, and Germany), helping thousands of patrons navigate the internet more safely and access additional information and context on the sources of news and information they encounter online.

2. DEMONETIZING DISINFORMATION

NewsGuard's brand safety service, BrandGuard, enables brands to invest in ad inventory on high quality news sites that publish trustworthy journalism — and avoid placing ads on websites that repeatedly publish misinformation or unreliable news. BrandGuard offers multiple "inclusion" and "exclusion" list options for advertisers, enabling each brand to tailor its approach to advertising on news to account for its values and risk tolerance while enforcing the publisher's right to be heard.

BrandGuard's inclusion and exclusion lists are based entirely on NewsGuard's Reliability Ratings of news and information websites, which are compiled by a team of experienced journalists and editors based on nine apolitical journalistic criteria. Based on the criteria, each publisher receives an overall rating level ranging from "High Credibility" to "Credible with Exceptions" to "Proceed with Caution," along with a 0-100 reliability score and an assessment on each of the nine criteria. Our rigorous rating process is explained in great detail on our website, on a page called "Website Rating Process and Criteria."

As the page describes, our process is transparent and accountable to everyone involved — including publishers, advertisers, and the general public. Each criterion is defined in significant detail, with numerous examples of how

a publisher would pass or fail the criterion. Each site's score is derived entirely from our assessments of those criteria, which are each assigned a specific number of points as outlined on our website. For each rating, we provide a detailed written Nutrition Label report that explains why NewsGuard made its determination on each of the criteria, provides evidence and examples to back up its assessments, and includes any relevant comments from the publisher.

Before publishing a rating or update, we always seek feedback from publishers that fail any of our criteria. We hold ourselves to the same standards we expect of the websites we rate, which means transparently conducting responsible journalism and allowing publishers to exercise their right to reply. Each assessment of a website is made public via NewsGuard's browser extension, which is available for public subscription, and is personally sent to each publisher evaluated. NewsGuard subscribers and rated publishers can read NewsGuard's detailed analyses, called "Nutrition Labels," which explain why NewsGuard made its determination on each of the criteria, provide evidence and examples to back up its assessments, and include any relevant comments from the publisher. Additionally, we also invite publishers who disagree with our rating to provide feedback on a dedicated page of our website.

This transparent process is documented on NewsGuard's website and in our Nutrition Labels, and allows publishers not only the right of reply — but also an opportunity to improve. More than 2,140 websites rated by NewsGuard have taken steps to improve editorial practices after being contacted by our team during the rating process — resulting in improved ratings and scores and, in some cases, leading advertisers to monetize their websites.

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

3.   EMPOWERING THE RESEARCH COMMUNITY

In 2022 NewsGuard partnered with the Joint Research Centre, the European Commission's science and knowledge service, to provide its data to help the JRC track online misinformation. NewsGuard's Reliability Ratings helped JRC analysts detect new unverified sources, track semantically similar narratives, and analyze the spread of these narratives across countries and languages to produce tools to help media analysts and fact checkers and raise awareness about online disinformation.

Through the Italian Digital Media Observatory's portal, NewsGuard regularly makes public its content and analysis on disinformation in Italy and in Europe, contributing to the consortium's media literacy efforts.

NewsGuard has various partnerships and collaborations with research institutions and universities that study disinformation, such us La Sapienza University in Rome, Ca' Foscari University in Venice, Carlo Bo University in Urbino, IMT Studies in Lucca, the Sciences Po University's Medialab in France, and the universities of Mannheim and Bamberg in Germany.

Every month, NewsGuard's team produces a report called the Misinformation Monitor covering misinformation, disinformation, and false news online with exclusive data from seven countries including four Member States (France, Italy, Austria, and Germany). All editions are distributed in all the countries NewsGuard operates in, and are available for free on NewsGuard's website in English, French, Italian, and German.

NewsGuard also regularly publishes Special Reports on disinformation focusing on different topics, trends, and platforms.

NewsGuard's white paper, "Fighting Misinformation with Journalism, not Algorithms," which is updated regularly and published on our website, outlines independent research on the effect of using human-curated news reliability ratings to mitigate false news, some of which has been conducted by leading academic institutions and other top scholars using NewsGuard's Reliability Ratings dataset.

II. Scrutiny of Ad Placements	
Commitment 1	
Relevant signatories participating in ad placements commit to defund the dissemination of disinformation, and improve the policies and systems which determine the eligibility of content to be monetised, the controls for monetisation and ad placement, and the data to report on the accuracy and effectiveness of controls and services around ad placements.	
Measure 1.6	Relevant Signatories will advance the development, improve the availability, and take practical steps to advance the use of brand safety tools and partnerships, with the following goals: - To the degree commercially viable, relevant Signatories will provide options to integrate information and analysis from source-raters, services that provide indicators of trustworthiness, fact-checkers, researchers or other relevant stakeholders providing information e.g., on the sources of Disinformation campaigns to help inform decisions on ad placement by ad buyers, namely advertisers and their agencies. - Advertisers, agencies, ad tech companies, and media platforms and publishers will take effective and reasonable steps to integrate the use of brand safety tools throughout the media planning, buying and reporting process, to avoid the placement of their advertising next to Disinformation content and/or in places or sources that repeatedly publish Disinformation. - Brand safety tool providers and rating services who categorise content and domains will provide reasonable transparency about the processes they use, insofar that they do not release commercially sensitive information or divulge trade secrets, and that they establish a mechanism for customer feedback and appeal.
QRE 1.6.3 Signatories that provide brand safety tools will outline how they are ensuring transparency and appealability about their processes and outcomes.	NewsGuard's brand safety service, BrandGuard, enables brands to invest in ad inventory on high quality news sites that publish trustworthy journalism, and avoid placing ads on websites that repeatedly publish misinformation or unreliable news. BrandGuard offers multiple "inclusion" and "exclusion" list options for advertisers, enabling each brand to tailor its approach to advertising on news to account for its values and risk tolerance while enforcing the publisher's right to be heard. BrandGuard's inclusion and exclusion lists are based entirely on NewsGuard's Reliability Ratings of news and information websites, which are compiled by a team of experienced journalists and editors based on nine apolitical journalistic criteria. Based on the criteria, each publisher receives an overall rating level ranging from "High Credibility" to "Credible with Exceptions" to "Proceed with Caution," along with a 0-100 reliability score and an assessment on each of the nine criteria. Our rigorous rating process is explained in great detail on our website, on a page called "Website Rating Process and Criteria." As the page describes, our process is transparent and accountable to everyone involved—including publishers, advertisers, and the general public. Each criterion is defined in significant detail, with numerous examples of how a publisher would pass or fail the criterion. Each site's score is derived entirely from our assessments of those criteria, which are each assigned a specific number of points as outlined on our website. For each rating, we provide a detailed written Nutrition Label report that explains why NewsGuard made its determination on each of the criteria, provides evidence and examples to back up its assessments, and includes any relevant comments from the publisher.

	Notably and unlike other brand safety providers that rely on black-box algorithms and unaccountable methodologies, NewsGuard's journalists proactively contact any publisher that fails any of the nine criteria before publishing a rating or rating update. Publishers may address any issues raised in the review to increase their score or provide comments explaining their practices, which are included in the Nutrition Label report so that advertisers may judge for themselves whether the publisher should be monetized. Once a rating or update is published, we proactively notify websites of their scores so that they are aware of any issues that could lead brands and ad agencies to exclude them from their ad inventory. This transparent process is documented on NewsGuard's website and in our Nutrition Labels, and allows publishers not only the right of reply — but an opportunity to improve. More than 2,140 websites rated by NewsGuard have taken steps to improve editorial practices after being contacted by our team during the rating process — resulting in improved ratings and scores and, in some cases, leading advertisers to monetize their websites.
QRE 1.6.4 Relevant Signatories that rate sources to determine if they persistently publish Disinformation shall provide reasonable information on the criteria under which websites are rated, make public the assessment of the relevant criteria relating to Disinformation, operate in an apolitical manner and give publishers the right to reply before ratings are published.	NewsGuard's ratings for news websites are based on nine apolitical criteria that assess the website's credibility and transparency. Each criterion is worth a certain number of points out of 100, weighted based on importance. All criteria are pass-fail, meaning that a site either receives all of the points associated with the criterion or receives no points for that criterion, and are applied in a way that ensures a publisher's right to be heard. All of our criteria and the associated points are publicly available on a page of our website called "Website Rating Process and Criteria." For each criterion, our web page provides a detailed explanation of the criterion and lists examples of reasons that a site might pass this criterion and reasons that a site might fail this criterion. Our goal is to help publishers understand exactly how they can meet our standards and improve their scores. To ensure our process remains strictly apolitical, NewsGuard relies on apolitical criteria when rating a site (e.g. a corrections policy cannot be partisan, as there is no conservative or progressive way to regularly publish corrections) and carries out a manual and rigorous editing process involving approximately five journalists and editors per website rating, ensuring no rating is the assessment of a single person. Each rating undergoes a final review step in which it is shared with the full team of NewsGuard analysts, including the Co-Editors-in-Chief, to raise any issues and ensure consistency. Before publishing a rating or update, we always seek feedback from publishers that fail any of our criteria. We hold ourselves to the same standards we expect of the websites we rate, which means transparently conducting responsible journalism and allowing publishers to exercise their right to reply. Each assessment of a website is made public via NewsGuard's browser extension, which is available for public subscription, and is personally sent to each publisher evaluated. NewsGuard subscribers and rated publishers can read NewsGuard's detailed analyses, called "Nutrition Labels," which explain why NewsGuard made its determination on each of the criteria, provide evidence and examples to back up its assessments, and include any relevant comments from the publisher. Additionally, we also invite publishers who disagree with our rating to provide feedback on a dedicated page of our website.

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.

Measure 17.2	Relevant Signatories will develop, promote and/or support or continue to run activities to improve media literacy and critical thinking such as campaigns to raise awareness about Disinformation, as well as the TTPs that are being used by malicious actors, among the general public across the European Union, also considering the involvement of vulnerable communities.
QRE 17.2.1 Relevant Signatories will describe the activities they launch or support and the Member States they target and reach. Relevant signatories will further report on actions taken to promote the campaigns to their user base per Member States targeted.	In late 2022 and early 2023, NewsGuard participated in numerous media literacy events with students, journalists, librarians, teachers and citizens in Member States it operates in (France, Italy, Germany, Austria), as well as other European Union Member States, including Finland. Our editors have conducted pro bono media literacy seminars in secondary schools, universities, journalism schools, and professional associations, basing the sessions on our methodology for evaluating the reliability of news sources online. Such events have included lessons for students at Padua University and La Sapienza (Italy,) and webinars with librarians and middle school teachers in Italy. In late June 2022, we presented our media literacy browser extension to 100 high school and university teachers in France gathered in the U.S. Embassy in Paris for the first Teacher Academy France event. NewsGuard is regularly involved in initiatives led by IDMO, the Italian Digital Media Observatory, of which NewsGuard is a member, including organizing events to raise awareness about disinformation in Italy. This included an event titled "Global Information War: An International Forum" about disinformation on the war in Ukraine. Our editors have also spoken at conferences to raise awareness of specific issues related to mis- and disinformation, including Russian propaganda, the Kremlin's tactics, and its spread in Member States (including a Milan Public Library event on war disinformation); health misinformation and the "infodemic" (including a lecture on harmful health misinformation at the Lugano Summer School in Public Health Policy, Economics, and Management, Switzerland, for public health practitioners in NGOs and ministries of health in several countries including in the EU); and the specificity of misinformation on certain platforms (including a seminar on TikTok to members of the Union of Journalists in Finland and journalists and journalism students at France's Sciences-Po university).

| | NewsGuard has also continued providing its browser extension for free to more than 800 public libraries throughout the world, including dozens in Italy, Germany, France, and Slovenia.

In October 2022, at the request of officials at the Center for Countering Disinformation (CPD) under the National Security and Defense Council of Ukraine, NewsGuard licensed its Russia-Ukraine Disinformation Tracker to the CPD for research and analytics purposes. |
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| **SLI 17.2.1 -** Relevant Signatories report on number of media literacy and awareness raising activities organised and or participated in and will share quantitative information pertinent to show the effects of the campaigns they build or support at the Member State level (for instance: list of Member States where those activities took place; reach of campaigns; engagement these activities have generated; number of interactions with online assets; number of participants). | From June 22, 2022, to January 16, 2023, NewsGuard participated in 11 media literacy seminars and awareness raising events in the following EU countries: France, Italy, and Finland. These events reached a total number of approximately 740 participants, including educators and librarians who in turn could reach hundreds of students and library users. We also shared recommendations on countering the spread of state-sponsored disinformation around COVID-19 with government representatives of all Member States that are part of the US-led Global Action Plan to End COVID-19 through a G7 Rapid Response Mechanism event organized by Global Affairs Canada (the EU, Spain, Norway, Italy, Germany and France).

NewsGuard has also provided its media literacy browser extension for free to approximately 100 public libraries in the EU (in Slovenia, Italy, France, and Germany), helping thousands of patrons navigate the internet more safely and access additional information and context on the sources of news and information they encounter online. |

Nr of media literacy/ awareness raising activities organised/ participated in	Nr of participants (etc)		
1) June 28, 2022, Milan Public Library, Italy, Discussion about Russia-Ukraine misinformation	1) About 30 people attending in person		
2) June 30, 2022, Teacher Academy France, co-organized by Micefa and the U.S. Embassy in Paris	2) About 100 high school and University teachers, as well as representatives of the schools		
3) June 30, 2022, "Global Information War: An International Forum" Panel on Russia-	3) About 80 people attending in person/online		

	Ukraine misinformation organized by IDMO				
	4) August 23, 2022, "Epidemic? Pandemic? Infodemic? Managing harmful health information for better health", Plenary lecture at the Swiss School of Public Health (SSPH+) Lugano Summer School in Public Health Policy, Economics, and Management	4) About 70 practitioners in ministries of health and NGOs, academics, phd students, and policy influencers from all over the world, including the EU.			
	5) September 12, 2022 European innovation hub MediaFutures,MediaFutures – Propaganda Narratives & Tech Journalism	5) About 30 people attending online			
	6) September 15, 2022, EU Joint Research Institute Disinfo Workshop "New Technological Approaches to Mis/Disinformation"	6) About 20 people attending online			
	7) October 18, 2022, ProgEu webinar "The right to Information: between Freedom and Responsibility"	7) About 20 people attending online			
	8) November 18, 2022, "Disinformation War: from Websites to TikTok", seminar organized by The Union of Journalists in Finland and their Foundation to Promote Journalistic Culture	8) About 50 Finnish journalists attending in person			

	9) December 5, 2022, Sciences PO School of Journalism's #NPDJ conference (Nouvelles Pratiques du Journalisme), "News at the Age of TikTok" - Information on TikTok: the Scroll and Search problems	9) About 250 people, journalism students as well as media executives and journalists attending in person/online		
	10) December 13, 2022, University of La Sapienza, Rome, Italy - students of Communications, Marketing, and Journalism	10) About 40 students attending		
	11) December 13, 2022, Global Affairs Canada - Roundtable on Countering the Spread of State-Sponsored Disinformation around COVID-19. Event organized by Canada but addressing all member countries of the G7 response mechanism, including several EU Member States	11) About 50 people attending, including government officials, academia, think tanks and other civil society organizations from all countries part of the US-led Global Action Plan to End COVID-19 - the EU itself, Spain, Norway, Italy, Germany and France		
Measure 17.3	For both of the above Measures, and in order to build on the expertise of media literacy experts in the design, implementation, and impact measurement of tools, relevant Signatories will partner or consult with media literacy experts in the EU, including for instance the Commission's Media Literacy Expert Group, ERGA's Media Literacy Action Group, EDMO, its country-specific branches, or relevant Member State universities or organisations that have relevant expertise.			
QRE 17.3.1 Relevant Signatories will describe how they involved and partnered with media literacy experts for the purposes of all Measures in this Commitment.	In 2022 NewsGuard partnered with the Joint Research Centre, the European Commission's science and knowledge service, to provide its data to help the JRC track online misinformation. NewsGuard's Reliability Ratings helped JRC analysts detect new unverified sources, track semantically similar narratives, and analyze the spread of these narratives across countries and languages to produce tools to help media analysts and fact checkers and raise awareness about online disinformation.			

	In September 2022, NewsGuard was among the panelists of the EU Joint Research Institute Disinfo Workshop, "New technological approaches to mis/disinformation." The same month, NewsGuard also presented its work at an event organized by the European innovation hub MediaFutures, "Building Narratives: How Propaganda can change our perception."
	Through the Italian Digital Media Observatory's portal, NewsGuard regularly makes its content and analysis on disinformation in Italy and in Europe public, contributing to the consortium's media literacy efforts.
	NewsGuard has various partnerships and collaborations with research institutions and universities that study disinformation, such us La Sapienza University in Rome, Ca' Foscari University in Venice, Carlo Bo University in Urbino, IMT Studies in Lucca, the Sciences Po University's Medialab in France, and the universities of Mannheim and Bamberg in Germany.
	For example, Carlo Bo University of Urbino integrated NewsGuard's Reliability Ratings in their tool CooRnet. Given a set of URLs, CooRnet detects coordinated link sharing behavior (CLSB) and outputs the network of entities that performed such behavior. With the integration of NewsGuard's data, the tool returns the average NewsGuard rating score obtained by the domains shared by a coordinated network.
	NewsGuard's Reliability Ratings are also integrated into Microsoft Search Coach, a free app in Microsoft Teams that helps educators and students produce effective queries and identify reliable resources when conducting online research. Search Coach is available globally in English, French, and Italian, with broader language coverage coming soon.

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.

Measure 22.4	Relevant Signatories providing trustworthiness indicators will ensure that information sources are being reviewed in a transparent, apolitical, unbiased, and independent manner, applying fully disclosed criteria equally to all sources and allowing independent audits by independent regulatory authorities or other competent bodies.

QRE 22.4.1 Relevant Signatories will provide details of the basic criteria they use to review information sources and disclose relevant safeguards put in place to ensure that their services are apolitical, unbiased, and independent. They will provide examples of how these are applied equally to a representative range of different publishers. Each analysis will indicate who contributed to assessing the source, or which certification body assessed the source.	Our ratings are based on nine apolitical and basic journalistic criteria that refer to the credibility and transparency of a news or information site. Our nine criteria are applied equally to all news sites, no matter their size or political orientation, from mainstream media outlets to small blogs, while allowing all sites to exert their right to be heard. Our criteria are basic journalistic principles and are inherently apolitical. They are also completely transparent and explained in great detail on our website, along with the relative weighting of each criterion, depending on its importance. Here are our nine criteria: • 1) The website does not repeatedly publish false content. • 2) It gathers and presents information responsibly. • 3) It regularly corrects or clarifies errors. • 4) It handles the difference between news and opinion responsibly. • 5) It avoids deceptive headlines. • 6) It discloses ownership and financing. • 7) It clearly labels advertising. • 8) It reveals who's in charge, including possible conflicts of interest. • 9) It provides the names of content creators, along with either contact or biographical information. Our rating process is designed to ensure our criteria are applied in an unbiased manner. After an analyst produces a first rating, with an associated Nutrition Label explaining in detail why he or she arrived at such a rating, the analysis is edited by at least two editors. Then, if any doubt remains about how to apply a specific criterion, it is discussed during a full staff meeting hosted by our two co-CEOs and co-Editors-in-Chief, Steven Brill and Gordon Crovitz. Over the years, this process has led NewsGuard to assign high ratings and poor ratings to sites of all political leanings. To ensure fairness, publishers are also put at the center of our rating process and given a chance to comment whenever our team flags an issue with the credibility or transparency of their site. For the sake of accountability, readers can see the credentials and backgrounds of everyone responsible for every NewsGuard Reliability Rating and Nutrition Label that they read. Because our tools are meant to empower users so that they can make informed decisions on which sources to trust and which to be wary of, we also allow users to submit suggestions of sources to rate, if we have not yet rated them, and to send feedback on existing ratings. All inbound messages are reviewed by our team.

	Finally, to ensure complete independence, we accept no fees from the news websites we rate. Our revenue comes from license fees that platforms, ad agencies, brands, media monitoring companies, and researchers — among other groups — pay to use our data.
Measure 22.5	Relevant Signatories providing trustworthiness indicators will provide compliance and correction mechanisms and respect the right of publishers to be heard, including to engage in the assessment process before indicators are applied and to have their responses available to consumers after assessments are published.
QRE 22.5.1 Relevant Signatories will publish regular corrections on their ratings or indicators if updates or mistakes occur. Relevant Signatories will provide examples of exchanges with publishers, including evidence of this engagement as recorded in trustworthiness indicators, and will regularly update their analysis to reflect any changes in the publications' practices, including any improvement of their practices.	NewsGuard is committed to making clear, prominent corrections of any mistakes that appear in our ratings or Nutrition Labels. Our corrections policy is stated on a dedicated page on our website, which includes a form where users can report possible errors for us to review. The corrections appear as notes at the bottom of the relevant Nutrition Label analyses, making clear what the original error was and how the review has been corrected. Publishers can also send requests for corrections and have the opportunity to note any error in our ratings and write-ups when they receive our Nutrition Labels, since we systematically send publishers our initial ratings and updates after they are published, thus enforcing their right to be heard. All of our Nutrition Labels are also regularly updated. We update all labels in our database at least once a year, or more frequently if we become aware of a change in the publication's practices. When a site's rating changes because the site has improved its practices, this specific change is described in an editor's note. We also engage in lengthy conversations with publishers to help them understand how they can meet certain criteria and improve their score. For example, in August 2022, Italian website IlTempo.it's score went from 44.5% (untrustworthy) to 82.5% (trustworthy) after the site started engaging in a conversation with NewsGuard in May 2022. The site added information about its ownership and financing, started publishing opinionated content in a dedicated opinion section, and started gathering and presenting information in a responsible manner after removing the inaccurate and misleading content previously flagged by NewsGuard. All changes to the site's rating were reflected in an editor's note, and NewsGuard's analysts will monitor the site through our rating update process to ensure it continues to adhere to these new standards. In November 2022, German website Eltern.de's score went from 80% to 87.5% after adding information on its owner following NewsGuard's notification that the site would otherwise fail that criterion. In October 2022, before NewsGuard published its initial rating of the French website LesNumeriques.com, the site's staff engaged with NewsGuard to understand how to pass its advertising criterion and started clearly labeling sponsored content. The website, which now scores 100, thus improved its score before any rating was published.

SLI 22.5.1 Relevant signatories will report on the total number of instances per Member State where, following a publisher exercising its right to be heard before a rating or updated rating is issued, a rating of untrustworthy changes to a rating of trustworthy.	From June 22, 2022, to January 16, 2023, seven EU-based websites (1 in Belgium, 2 in France, 3 in Italy, 1 in Austria) saw their rating go from untrustworthy (below 60%) to trustworthy (60% and above), including Italy's IlTempo.it and France's OhMyMag.com. All of our score changes are recorded internally in the site's rating history, as well as noted in editor's notes at the bottom of each Nutrition Label. Data measurement is therefore easily done by looking at the ratings and updates published in the timeframe concerned, and manually verifying which ratings have gone from a score deemed untrustworthy (below 60) to a trustworthy score of 60 and above. We also record whether sites have responded to our inquiries and engaged with us, and which practice they've improved after engaging with us. The relevant data is constantly recorded in our internal system.
SLI 22.5.2 Relevant Signatories will report regularly on the number of publishers who have improved their journalistic practices after being assessed on the disclosed criteria and whose conformity, respectively trustworthiness scores thereby improved.	Since NewsGuard launched in 2018, more than 2,100 news and information websites around the world (in the E.U but also in the U.S., Canada, and the U.K.) have improved their journalism practices after engaging with us, increasing their accountability and providing readers with more trustworthy news and information. From June 22, 2022, to January 16, 2023, 78 websites improved their NewsGuard ratings in the E.U.: 27 Italian-language websites, 21 German-language websites, and 30 French-language websites. All of our score changes are recorded in our database and explained to users in editor's notes at the bottom of each Nutrition Label. Data measurement is therefore easily done by looking at the ratings and updates published in the timeframe concerned, and manually verifying which ratings have improved over that period of time. Then, our editors have checked if these improvements occurred after there were direct exchanges with the sites' representatives, either by email or over the phone. Because we record whether sites have responded to our inquiries and engaged with us, and which practice they've improved after engaging with us, the relevant data is constantly recorded in our internal system, and easy to pull. All email exchanges and phone interviews are also recorded as notes in our internal system for us to verify.

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

Measure 29.1	Relevant Signatories will use transparent methodologies and ethical standards to conduct research activities that track and analyse influence operations, and the spread of Disinformation. They will share datasets, research findings and methodologies with members of the Task-force including EDMO, ERGA, and other Signatories and ultimately with the broader public.
QRE 29.1.1 Relevant Signatories will provide reports on their research, including topics, methodology, ethical standards, types of data accessed, data governance, and outcomes.	Every month, NewsGuard's team produces a report called the Misinformation Monitor covering misinformation, disinformation, and false news online with exclusive data from seven countries including four Member States (France, Italy, Austria, and Germany). All editions are distributed in all the countries NewsGuard operates in, and are available for free on NewsGuard's website in English, French, Italian, and German. NewsGuard also regularly publishes Special Reports on disinformation focusing on different topics, trends, and platforms. Examples of reports published by NewsGuard from June 2022 to January 2023 include: - The Italian Election Misinformation Tracker, chronicling the top myths spreading online about the Sept. 25, 2022 vote. - The Russia State TV Monitor, translating and summarizing war-related coverage and propaganda narratives on Russian State TV Channel One, from a program that airs Sunday evenings. - A report on engagement with Twitter's largest misinformation providers, and how it increased in the week following Elon Musk's buying the platform. - A report on how TikTok's Search Engine Pumps Toxic Misinformation To Its Young Users. NewsGuard relies on the data of its two datasets: Reliability Ratings (analyses of the reliability of all the news and information sources that account for 95% of online engagement in the countries it operates in), and Misinformation Fingerprints (a catalog of the top misinformation narratives spreading online). In all its reports, NewsGuard explains its methodology. For example, in its report titled "Twitter Misinformation Superspreaders See Huge Spike in Engagement Post-Acquisition by Elon Musk," NewsGuard explained the methodology used by its analysts, saying: "In November 2022, three NewsGuard analysts analyzed available NewsWhip data on the 50 most-followed Twitter accounts linked to sites that fail NewsGuard's standard for not repeatedly publishing false content. (NewsGuard employs a team of journalists to review and rate news and information websites using nine criteria.) Twenty-five of the 50 most followed untrustworthy Twitter accounts were not reliably tracked by NewsWhip, so this analysis includes data of the 25 that are tracked". All NewsGuard reports carry the bylines of their authors and link to their respective biographies.

QRE 29.1.2 Relevant Signatories will update their research in the Transparency Centre to allow for greater awareness and availability of their work.	All NewsGuard reports will be made available in the Transparency Centre, and, when relevant for the Italian public, on IDMO's portal.
QRE 29.1.3 Relevant Signatories will provide detailed information on methodology development to all stakeholders informed about research results. They will also regularly inform all members of the Task-force, including ERGA, EDMO and other Signatories about research activities they conduct, and, wherever possible, the related methodologies used. They will finally share, wherever possible, such research outcomes and related methodologies with the broader public.	NewsGuard's white paper, "Fighting Misinformation with Journalism, not Algorithms," which is updated regularly and published on our website, outlines independent research on the effect of using human-curated news reliability ratings to mitigate false news, some of which has been conducted by leading academic institutions and other top scholars using NewsGuard's Reliability Ratings dataset. Since NewsGuard's founding in 2018, researchers at 25 academic, nonprofit, and corporate institutions have licensed NewsGuard's data for their work. NewsGuard is regularly in touch with the EU Joint Research Centre, ERGA, and EDMO informing them of its works, making its data available when requested, and offering access to its datasets to monitor disinformation in Europe. NewsGuard's special reports and analyses are all available to the public on NewsGuard's website, including outcomes and methodologies.

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.

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.

VIII. Transparency Centre

Commitment 36

Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner.

QRE 36.1.1 (**for the Commitments 34-36)** With their initial implementation report, Signatories will outline the state of development of the Transparency Centre, its functionalities, the information it contains, and any other relevant information about its functioning or operations. This information can be drafted jointly by Signatories involved in operating or adding content to the Transparency Centre.	NewsGuard committed to setting up and maintaining a publicly available common Transparency Centre website. All relevant information related to the implementation of the Code's Commitments and Measures will be presented in an easy-to-understand and clear manner. That information will be regularly updated in a timely fashion.
QRE 36.1.2 (**for the Commitments 34-36)** Signatories will outline changes to the Transparency Centre's content, operations, or functioning in their reports over time. Such updates can be drafted jointly by Signatories involved in operating or adding content to the Transparency Center.	NewsGuard will be working with the other Signatories to outline any changes in the Transparency Centre's content, operations, or functioning in their reports over time.

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.

Measure 37.6	Signatories agree to notify the rest of the Task-force when a Commitment or Measure would benefit from changes over time as their practices and approaches evolve, in view of technological, societal, market, and legislative developments. Having discussed the changes required, the Relevant Signatories will update their subscription document accordingly and report on the changes in their next report.
QRE 37.6.1 Signatories will describe how they engage in the work of the Task-force in the reporting period, including the sub-groups they engaged with.	NewsGuard has been regularly participating in the meetings of these subgroups: - Monitoring and Reporting + Structural Indicators subgroup - Crisis Response subgroup - Ad Scrutiny subgroup Monitoring and Reporting + Structural Indicators: NewsGuard contributed to the preparation of the templates used by the signatories to fill the reports to underline their actions to implement the Code. NewsGuard is also working on supporting the process to create a structural indicator to measure the prevalence of disinformation, making its Reliability Ratings available as a way to identify disinformation sources. Crisis Response: NewsGuard participates in all meetings of the Crisis response subgroup and shares with the group its observations on new narratives and trends that its team are monitoring when it comes to current misinformation crises (COVID-19 and vaccine misinformation, as well as Russian propaganda on the war in Ukraine and its spread to the E.U. and different platforms.) NewsGuard also makes the group aware of important new reports or developments to existing reports it publishes on relevant themes including on its Russia-Ukraine Disinformation Tracking Center, and reports on specific platforms and topics, including its investigation on content glorifying actions by the Russian paramilitary group Wagner on TikTok. Ad Scrutiny: NewsGuard regularly participates in the Ad Scrutiny subgroup meetings, and it made its data available to create, with the help of a third party, a structural indicator to measure and track over time the demonetization of disinformation.

X. Monitoring of Code
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.	
Measure 38.1	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.
QRE 38.1.1 Relevant Signatories will outline the teams and internal processes they have in place, per service, to comply with the Code in order to achieve full coverage across the Member States and the languages of the EU.	Members of NewsGuard's European team (including Roberta Schmid, Managing Editor and Vice-President Partnerships for Germany and Austria, and Virginia Padovese and Chine Labbé, co-Managing Editors and Vice-Presidents for Partnerships for Europe,) are responsible for implementing and monitoring the company's commitments under the code in Germany, Austria, Italy, and France. NewsGuard's co-CEO and co-Editor in Chief Gordon Crovitz, and NewsGuard's Advisor Israel Mirsky also regularly contribute to the Ad Scrutiny subgroup's work.