Code of Practice on Disinformation – Report of Pagella Politica and Facta.news (TFCF srl) for the period 16 December 2022 to 16 January 2023

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#### Executive summary

Executive summary (max. 2 pages)

Pagella Politica and Facta.news (PP/F) are two fact-checking and debunking projects operated by the Italian company TFCF, active in various projects in the research, monitoring and contrast of disinformation at the national and European level, as well as media and information literacy.

In light of their nature and activities, PP/F have chosen the following commitments: 33-34-35-36-37-38-39-40-42-43.

PP/F ethical, transparency and independence standards are certified annually by IFCN Code of principles external evaluators. PP/ F are also members of the EFCSN consortium and governance body. They are applying to become official signatories of its Code of Standards at the end of this month (January 2023).

Pagella Politica and Facta participate in the crisis management sub-group actively. They share knowledge about the state of disinformation at Italian level, and also at the European level, thanks to PP/F position of coordinators of the fact-checking network within EDMO.

PP/F have internal staff dedicated to the CoP, who participate in TaskForce subgroups, and ensure internal compliance with the commitments.

#### Guidelines for filling out the report

Baseline reports are detailing how Signatories have implemented their Commitments under the Code and provide the Qualitative Reporting Elements (QREs) and Service Level Indicators (SLIs), as they stand one month after the implementation. The baseline report should also include a comparison between the measures in place under the previous Code to the measures taken to implement the new Code. The measures taken to implement the new Code should be outlined per commitment in the dedicated field of the reporting template.

#### Reporting period

The reporting period to be covered in the baseline reports is from 16 December 2022 to 16 January 2023 for all Signatories. (The implementation period of the Code from 16 June 2022 to 16 December 2022 is followed by a one-month reporting period from 16 December 2022 to 16 January 2023.) Signatories shall submit baseline reports outlining policy updates and actions taken to implement the Code during the implementation period. Data, e.g. on the number of actions taken under a specific policy, should be reported on from the end of the implementation period (16 December 2022) until the cut-off date of 16 January 2023. In case specific data is not available for the first reporting period (from 16 December 2022 to 16 January 2023), please provide the monthly average based on the previous quarter, clearly outlining the methodology used in the relevant field. The submission date for baseline reports is January 31, 2023.

#### Adjusting the reporting template

Non-VLOPs can adapt the template to specific commitments and measures they subscribed to. This may include adapted wording for commitments, measures, QREs and SLIs. Non-VLOPs signatories will report only on commitments and measures they subscribed to and provide Member State-level data only if feasible.

#### Reporting per Service

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

#### Reporting in text form

Reporting in the form of written text is required for several parts of the report. Most of them are accompanied by a target character limit. Please stick to the target character limit as much as possible. We encourage you to use bullet points and short sentences. Links should only be used to provide examples or to illustrate the point. They should not be used to replace explanations or to provide data in the forms. All relevant explanations and data must be included in the table directly, in written form.

#### Reporting SLIs and data

Reporting on Service Level Indicators requires quantitative information to be reported in the reporting template. We ask you to report data in the format provided by the reporting template, not on external links.

#### Reporting on TTPs

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

#### **Missing Data**

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

#### Attachments

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

#### Uploading data to the Transparency Centre

After the submission of the baseline reports and the launch of the Transparency Centre website, all data from the reporting template must be uploaded to the Transparency Centre within maximum 7 days, allowing easy data access and filtering. It is the responsibility of the Signatories to ensure that the uploading takes place and is executed on time. Signatories are also responsible to ensure that the Transparency Centre is operational and functional by the time of the reports' submission, that the data from the reports are uploaded and made accessible in the Transparency Centre within the above deadline, and that users are able to read, search, filer and download data as needed in a user-friendly way and format.

#### II. Scrutiny of Ad Placements

#### Commitment 1

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

Measure 1.1	[insert wording if adapted]			
<b>QRE 1.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested chai	acter limit: 2000 characters]		
SLI 1.1.1 – Numbers by	Methodology of data measurement [sug	gested character limit: 500 characters]		
actions enforcing policies above (specify if at page and/or domain level) [change wording if adapted]	Type of Action 1 [linked to the policy mentioned in QRE]	Type of Action 2 [linked to the policy mentioned in QRE]	Type of Action 3 [linked to the policy mentioned in QRE]	Type of Action 4 [linked to the policy mentioned in QRE]
Level	Page/Domain	Page/Domain	Page/Domain	Page/Domain
Data				
Member States [example, insert only if feasible]				
Austria				
Belgium				
Bulgaria				
Croatia				
Cyprus				
Czech Republic				
Denmark				
Estonia				
Finland			-	
France				
Germany				
Greece				
Hungary				
Ireland				
Italy				

Latvia				
Lithuania				
Luxembourg				
Malta				
Netherlands				
Poland				
Portugal				
Romania				
Slovakia				
Slovenia				
Spain				
Sweden				
Iceland				
Liechtenstein				
Norway				
Total EU				
Total EEA				
This additional Service on media metrics avail the Code (Ebiquity plc.)	able to Signatories (query/bid1 or impres	nancial value of the actions taken by Signa ssion²) and applying an agreed-upon conv	tories to demonetise disinformatio version factor provided by a third p	n sources (under SLI 1.1.1). It is based party designated by the Task-force of
SLI 1.1.2 - Preventing the flow of legitimate advertising investment to sites or	Methodology of data measurement [sug	gested character limit: 500 characters]		
content that are designated as disinformation [change wording if adapted]	Euro value of ads demonetised			
Data				
Measure 1.2	[insert wording if adapted]			

<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>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).

QRE 1.2.1 [insert	Outline relevant actions [sugg	astad character limit: 2000 charactered		
wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
SLI 1.2.1 [change	Methodology of data measure	ment [suggested character limit: 500 ch	naracters]	
wording if adapted]	Nr of policy reviews	Nr of update to policies	Nr of accounts barred	Nr of domains barred
Data				
Measure 1.3	[insert wording if adapted]			
<b>QRE 1.3.1</b> [insert wording if adapted]	Outline relevant actions [sugg	ested character limit: 2000 characters]		
Measure 1.4	[insert wording if adapted]			
<b>QRE 1.4.1</b> [insert wording if adapted]		ested character limit: 2000 characters]		
Measure 1.5	[insert wording if adapted]			
<b>QRE 1.5.1</b> [insert wording if adapted]		ested character limit: 2000 characters]		
<b>QRE 1.5.2</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
Measure 1.5	Outline relevant actions [suggested character limit: 2000 characters]			
<b>QRE 1.5.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
<b>QRE 1.5.2</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
Measure 1.6	[insert wording if adapted]			
<b>QRE 1.6.1</b> [insert wording if adapted]		ested character limit: 2000 characters]		
<b>QRE 1.6.2</b> [insert wording if adapted]		ested character limit: 2000 characters]		
<b>QRE 1.6.3</b> [insert wording if adapted]		ested character limit: 2000 characters]		
<b>QRE 1.6.4</b> [insert wording if adapted]		ested character limit: 2000 characters]		
SLI 1.6.1 [change		ment [suggested character limit: 500 ch		
wording if adapted]	In view of steps taken to integrate brand safety tools: % of advertising/ media investment protected by such tools:			
Data				

II. Scrutiny of Ad Placements
Commitment 2

Relevant Signatories parti	icipating in advertising commit to	prevent the misuse of advertising messages. [change wording if ad		mation in the form of advertising
Measure 2.1	[insert wording if adapted]	messages. [change wording if ad	lapteuj	
QRE 2.1.1 [insert wording if adapted]	5	d character limit: 2000 characters]		
SLI 2.1.1 – Numbers by	Methodology of data measuremer	nt [suggested character limit: 500 cha	aracters]	
actions enforcing policies above [change wording if adapted]	Type of Action 1 [linked to the policy mentioned in QRE]	Type of Action 1 [linked to the Type of Action 2 [linked to the Type of Action 3 [linked to the Type of Action 4 [linked to the		
Data				
Measure 2.2	[insert wording if adapted]			
<b>QRE 2.2.1</b> [insert wording if adapted]	Outline relevant actions [suggeste	d character limit: 2000 characters]		
Measure 2.3	[insert wording if adapted]			
<b>QRE 2.3.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
SLI 2.3.1 [change wording if	Methodology of data measurement [suggested character limit: 500 characters]			
adapted]	Number of ads removed (as well as reach of ads before they were successfully removed)     Number of ads prohibited			
Data				
Measure 2.4	[insert wording if adapted]			
<b>QRE 2.4.1</b> [insert wording if adapted]	Outline relevant actions [suggeste	d character limit: 2000 characters]		
SLI 2.4.1 [change wording if	Methodology of data measurement [suggested character limit: 500 characters]			
adapted]	Number of appeals		Proportion of appeals that led to a	a change of the initial decision
Data				

	II. Scrutiny of Ad Placements
	Commitment 3
players, expanding to orga	ed in buying, selling and placing digital advertising commit to exchange best practices and strengthen cooperation with relevant nisations active in the online monetisation value chain, such as online e-payment services, e-commerce platforms and relevant stems, with the aim to increase the effectiveness of scrutiny of ad placements on their own services. [change wording if adapted]
Measure 3.1	[insert wording if adapted]
<b>QRE 3.1.1</b> [insert wording if	Outline relevant actions [suggested character limit: 2000 characters]
adapted]	
Measure 3.2	[insert wording if adapted]

<b>QRE 3.2.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
Measure 3.3	[insert wording if adapted]
<b>QRE 3.3.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]

	III. Political Advertising
	Commitment 4
Relevant	Signatories commit to adopt a common definition of "political and issue advertising". [change wording if adapted]
Measure 4.1	[insert wording if adapted]
Measure 4.2	[insert wording if adapted]
QRE 4.1.1 (for measures 4.1 and 4.2) [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
QRE 4.1.2 (for measures 4.1 and 4.2) [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]

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

III. Political Advertising
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. [change wording if adapted]
Measure 6.1 [insert wording if adapted]

<b>QRE 6.1.1</b> [insert wording if	Outline relevant actions [suggested character limit: 2000 characters]					
adapted]						
Measure 6.2	[insert wording if adapted]					
<b>QRE 6.2.1</b> [insert wording if adapted]		Outline relevant actions [suggested character limit: 2000 characters]				
<b>QRE 6.2.2</b> [insert wording if adapted]	Outline relevant actions [suggested	character limit: 2000 characters]				
SLI 6.2.1 – numbers for	Methodology of data measurement	[suggested character limit: 500 cha	iracters]			
actions enforcing policies above [change wording if adapted]	Number of ads accepted & labelled according to 6.2Amounts spent by labelled advertisersOther relevant metricsOther relevant metrics					
Data						
Measure 6.3	[insert wording if adapted]					
<b>QRE 6.3.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]					
Measure 6.4	[insert wording if adapted]					
<b>QRE 6.4.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]					
Measure 6.5	[insert wording if adapted]					
<b>QRE 6.5.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]					

## 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. [change wording if adapted]

	[incenture relieve if a denoted]				
Measure 7.1	[insert wording if adapted]				
<b>QRE 7.1.1</b> [insert wording if	Outline relevant actions [suggested character limit: 2000 characters]				
adapted]					
SLI 7.1.1 – numbers for	Methodology of data measurement [suggested character limit: 500 characters]				
actions enforcing policies	No of ads rejected Other relevant metrics				
above (comparable metrics					
as for SLI 6.2.1) [change					
wording if adapted]					

Data		
	Data	
	2444	

III. Political Advertising					
Commitment 8					
Relevant Signatories commit to provide transparency information to users about the political or issue ads they see on their service. [change wording if adapted]					
Measure 8.1 [insert wording if adapted]					
Measure 8.2 [insert wording if adapted]					
QRE 8.2.1 (for measures 8.1 & 8.2) [insert wording if adapted]       Outline relevant actions [suggested character limit: 2000 characters]					

III. Political Advertising				
Commitment 9				
Relevant Signatories commit to provide users with clear, comprehensible, comprehensive information about why they are seeing a political or issue ad. [change wording if adapted]				
Neasure 9.1 [insert wording if adapted]				
easure 9.2 [insert wording if adapted]				
RE 9.2.1 (for measures 9.1 & 9.2) [insert wording if adapted] Outline relevant actions [suggested character limit: 2000 characters]				

III. Political Advertising				
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. [change wording if adapted]				
Measure 10.1	[insert wording if adapted]			
Neasure 10.2 [insert wording if adapted]				
QRE 10.2.1 (for measures 10.1 & 10.2) [insert wording if adapted] Outline relevant actions [suggested character limit: 2000 characters]				

# 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." [change wording if adapted]

Measure 11.1	[insert wording if adapted]				
Measure 11.2	[insert wording if adapted]				
Measure 11.3	[insert wording if adapted]				
Measure 11.4	[insert wording if adapted]				
QRE 11.1.1 (for measures 11.1-11.4) [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
<b>QRE 11.4.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				

# III. Political Advertising 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. [change wording if adapted]

Measure 12.1	[insert wording if adapted]
Measure 12.2	[insert wording if adapted]
Measure 12.3	[insert wording if adapted]
QRE 12.1.1 (for measures 12.1-12.3) [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]

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. [change wording if adapted]				
Measure 13.1 [insert wording if adapted]				
Measure 13.2 [insert wording if adapted]				
Measure 13.3 [insert wording if adapted]				
QRE 13.1.1 (for measures 13.1-13.3) [insert wording if adapted] Outline relevant actions [suggested character limit: 2000 characters]				

### **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 personalized 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

Measure 14.1	[insert wording if adapted]			
<b>QRE 14.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
<b>QRE 14.1.2</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
Measure 14.2 [insert wording if adapted]	[insert wording if adapted]			
QRE 14.2.1 [insert wording if adapted] Outline relevant actions [suggested character limit: 2000 characters]				
SLI 14.2.1 – SLI 14.2.4				

TTP OR ACTION 1 [replicate for number of TTPs or actions reported]	[ONLY IF THIS TABLE COVERS MORE THAN ONE TTP]: TTPs covered by this action, selected from the list at the top of this chapter [suggested character limit: 500 characters] Methodology of data measurement [suggested character limit: 500 characters] Where input is not provided explain reasons and planned remedial action [suggested character limit: 500 characters]											
	SLI 1	4.2.1		SLI 1	4.2.2			SLI 14.2.3			SLI 14.2.4	
	SLI 14.2.1         SLI 14.2.2         SLI 14.2.3           Nr of instances         Nr of actions         Views/ impression         Interaction /         Views/ impression         Interaction r and         Penetratio r and         Trends on targeted         T		Trends on narratives used	TTPs related content in relation to overall content on the service	Views/ impression s of TTP related content (in relation to overall views/imp ressions on the service)	Interaction / engageme nt with TTP related content (in relation to overall interaction /engagem ent on the service)						
Data												

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. [change wording if adapted]				
Measure 15.1 [insert wording if adapted]				
RE 15.1.1 [insert wording if adapted]         Outline relevant actions [suggested character limit: 2000 characters]				
easure 15.2 [insert wording if adapted]				
<b>QRE 15.2.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			

	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. [change wording if adapted]

Measure 16.1 [insert wording if adapted]				
<b>QRE 16.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
SLI 16.1.1 – Numbers of actions as a result of information sharing	Methodology of data measurement	acters]		
[change wording if adapted]	Nr of actions taken (total)	Type of detected content	Other relevant metrics	
Data				
Measure 16.2 [insert wording if adapted]		-		
<b>QRE 16.2.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			

# 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. [change wording if adapted]

Measure 17.1	[insert wording if adapted]					
<b>QRE 17.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]					
SLI 17.1.1 - actions enforcing policies above [change wording if	Methodology of data	measurement [sugge	sted character l	imit: 500 cha	aracters]	
adapted]	Total count of the too impressions	ol's Interactions/ engagement w tool	-	ther relevant	metrics	Other relevant metrics
Data						
Measure 17.2	[insert wording if adapted]					
<b>QRE 17.2.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]					
SLI 17.2.1 - actions enforcing policies above [change wording if	Methodology of data	measurement [sugge			aracters]	
adapted]	Nr of media literacy/ awareness raising activities organised/ participated in	Reach of campaigns	Nr of particip		of interactions h online assets	

Data					
Measure 17.3	[insert wording if ada	pted]			
QRE 17.3.1 [insert wording if adapted]	Outline relevant action	ons [suggested charact	er limit: 2000 charact	ers]	

V. Empowering Users				
Commitment 18				
Relevant Signatories commit to minimise the risks of viral propagation of Disinformation by adopting safe design practices as they develop their systems, policies, and features. [change wording if adapted]				
Measure 18.1	[insert wording if adapted]			
<b>QRE 18.1.1</b> [insert wording if adapted]	Outline relevant actions [su	iggested character limit: 200	0 characters]	
<b>QRE 18.1.2</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
QRE 18.1.3 [insert wording if adapted]	Outline relevant actions [su	uggested character limit: 200	0 characters]	
SLI 18.1.1 - actions proving effectiveness of measures and policies	Methodology of data meas	urement [suggested characte	er limit: 500 characters]	
[change wording if adapted]	Reduction of prevalence of disinformation	Reduction of views/ impressions of disinformation	Increase in visibility of authoritative information	Other relevant metrics
Data				
Measure 18.2	[insert wording if adapted]	•	•	
<b>QRE 18.2.1</b> [insert wording if adapted]	Outline relevant actions [su	uggested character limit: 200	0 characters]	
SLI 18.2.1 - actions taken in response to policy violations [change	Methodology of data measurement [suggested character limit: 500 characters]			
wording if adapted]	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
Data				
Measure 18.3	[insert wording if adapted]			
<b>QRE 18.3.1</b> [insert wording if adapted]	Outline relevant actions [su	uggested character limit: 200	0 characters]	

# 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. [change wording if adapted]

Measure 19.1	[insert wording if adapted]
<b>QRE 19.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
Measure 19.2	[insert wording if adapted]
SLI 19.2.1 – user settings [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters]
	No of times users actively engaged with these settings
Data	

## Commitment 20

Relevant Signatories commit to empower users with tools to assess the provenance and edit history or authenticity or accuracy of digital content. [change wording if adapted]

Measure 20.1	[insert wording if adapted]
QRE 20.1.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
Measure 20.2	[insert wording if adapted]
<b>QRE 20.2.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]

#### 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. [change wording if adapted]

Measure 21.1	[insert wording if adapted]				
<b>QRE 21.1.1</b> [insert wording if adapted]	Outline relevant actions [su	Outline relevant actions [suggested character limit: 2000 characters]			
SLI 21.1.1 - actions taken under measure 21.1 [change wording if	Methodology of data meas	urement [suggested characte	er limit: 500 characters]		
adapted]	Total impressions of fact-checks	Ratio of impressions of fact-checks to original impressions of fact-checked content	Reach of labels/ fact-checkers and other authoritative sources	Other pertinent metric	
Data					
SLI 21.1.2 - actions taken under measure 21.1 [change wording if adapted]	Methodology of data meas	urement [suggested characte	er limit: 500 characters]		

	Nr of articles published by independent fact-checkers	Nr of labels applied to content, such as on the basis of such articles	Meaningful metrics such as the impact of 21.1. measures on user interactions with, or user re-shares of, content fact-checked as false or misleading
Data			
QRE 21.2.1 [insert wording if adapted]	Outline relevant actions [suggested c	haracter limit: 2000 characters]	
Measure 21.3 [insert wording if adapted]			
<b>QRE 21.3.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]		

#### Commitment 22

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

Measure 22.1	[insert wording if adapted]
<b>QRE 22.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
SLI 22.1.1 - actions enforcing policies above [change wording if	Methodology of data measurement [suggested character limit: 500 characters]
adapted]	Percentage of users that have enabled the trustworthiness indicator
Data	
Measure 22.2	[insert wording if adapted]
<b>QRE 22.2.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
Measure 22.3	[insert wording if adapted]
<b>QRE 22.3.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
Measure 22.4	[insert wording if adapted]
<b>QRE 22.4.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
SLI 22.4.1 - actions enforcing policies above [change wording if	Methodology of data measurement [suggested character limit: 500 characters]
adapted]	Volume of traffic to trustworthy sources generated thanks to the outlined trustworthiness indicators
Data	
Measure 22.5	[insert wording if adapted]
<b>QRE 22.5.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
SLI 22.5.1 - actions enforcing policies above [change wording if	Methodology of data measurement [suggested character limit: 500 characters]
adapted]	Total nr of instances when a publisher's rating changed from untrustworthy to trustworthy following a hearing before a rating/updated rating is issued

Data				
SLI 22.5.2 - actions enforcing policies above [change wording		urement [suggested characte		
if adapted]	Total nr of publishers who i	mproved their score under th	e trustworthiness indicator	
Data				
Measure 22.6	[insert wording if adapted]			
<b>QRE 22.6.1</b> [insert wording if adapted]	Outline relevant actions [su	ggested character limit: 2000	D characters]	
SLI 22.6.1 - actions enforcing policies above [change wording if	Methodology of data measurement [suggested character limit: 500 characters]			
adapted]	Relevant statistics and analysis on engagement and conformity assessment			
Data				
Measure 22.7	[insert wording if adapted]			
<b>QRE 22.7.1</b> [insert wording if adapted]	Outline relevant actions [su	ggested character limit: 2000	D characters]	
SLI 22.7.1 - actions enforcing policies above [change wording if	Methodology of data measurement [suggested character limit: 500 characters]			
adapted]	Impressions	Clicks	CTR	Shares
Data				

V. Empowering Users		
	Commitment 23	
Relevant Signatories commit to provide users with the fu	nctionality to flag harmful false and/or misleading information that violates Signatories policies or terms of service. [change wording if adapted]	
Measure 23.1	[insert wording if adapted]	
QRE 23.1.1 [insert wording if adapted] Outline relevant actions [suggested character limit: 2000 characters]		
Measure 23.2 [insert wording if adapted]		
<b>QRE 23.2.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]	

## 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. [change wording if adapted]

Measure 24.1	[insert wording if adapted]			
QRE 24.1.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
SLI 24.1.1 - enforcement actions [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters]			
				Metrics on the duration and effectiveness of the appeal process
Data				

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. [change wording if adapted]					
Measure 25.1 [insert wording if adapted]					
<b>QRE 25.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
SLI 25.1.1 [change wording if adapted]					
Our company would like to provide following data:					
Data					
Measure 25.2	[insert wording if adapted]				
QRE 25.2.1 [insert wording if adapted]	2.1 [insert wording if adapted] Outline relevant actions [suggested character limit: 2000 characters]				
SLI 25.2.1 - use of select tools [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters]				
	Metrics on the use and impact of tools, features and campaigns deployed to meet Measures 25.2 and 25.2				
Data					

### 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. [change wording if adapted]

Measure 26.1	[insert wording if adapted]					
<b>QRE 26.1.1</b> [insert wording if adapted]	Outline relevant a	Outline relevant actions [suggested character limit: 2000 characters]				
QRE 26.1.2 [insert wording if adapted]	Outline relevant a	Outline relevant actions [suggested character limit: 2000 characters]				
SLI 26.1.1 - e uptake of the tools and processes described in	Methodology of data measurement [suggested character limit: 500 characters]					
Measure 26.1 [change wording if adapted]	Nr of users of public accessOther quantitative information on public accessOther quantitative inform public access				e information on	
Data						
Measure 26.2	[insert wording if adapted]					
QRE 26.2.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]					
QRE 26.2.2 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]					
QRE 26.2.3 [insert wording if adapted]	Outline relevant a	Outline relevant actions [suggested character limit: 2000 characters]				
SLI 26.2.1 - meaningful metrics on the uptake, swiftness, and	Methodology of a	lata measurement	suggested charact	er limit: 500 charac	ters]	
acceptance level of the tools and processes in Measure 26.2 [change wording if adapted]	No of monthly users	No of applications received	No of applications rejected	No of applications accepted	Average response time	Other metrics
Data						
Measure 26.3	[insert wording if	adapted]				
<b>QRE 26.3.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]					

### VI. Empowering the research community

### 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. [change wording if adapted]

Measure 27.1	[insert wording if adapted]
<b>QRE 27.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
Measure 27.2	[insert wording if adapted]
QRE 27.2.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
Measure 27.3	[insert wording if adapted]
QRE 27.3.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
SLI 27.3.1 - research projects vetted by the independent	Methodology of data measurement [suggested character limit: 500 characters]
third-party body [change wording if adapted]	Nr of research projects for which they provided access to data
Data	
Measure 27.4	[insert wording if adapted]

**QRE 27.4.1** [insert wording if adapted]

Outline relevant actions [suggested character limit: 2000 characters]

VI. Empowering the research community					
Commitment 28					
Relevant Signatories commit to support good faith research into Disinformation that involves their services. [change wording if adapted]					
Measure 28.1 [insert wording if adapted]					
<b>QRE 28.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
Measure 28.2	[insert wording if adapted]				
<b>QRE 28.2.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
Measure 28.3	Measure 28.3 [insert wording if adapted]				
<b>QRE 28.3.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
Measure 28.4	[insert wording if adapted]				
<b>QRE 28.4.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				

VI. Empowering the research community	VI.	Empowe	ering the	research	community
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### 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. [change wording if adapted]

Measure 29.1	[insert wording if adapted]			
<b>QRE 29.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
<b>QRE 29.1.2</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
QRE 29.1.3 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
SLI 29.1.1 - reach of stakeholders or citizens informed about	Methodology of data measurement [suggested character limit: 500 characters]			
the outcome of research projects [change wording if adapted]	Reach of stakeholders or citizens informed about the project			
Data				
Measure 29.2	[insert wording if adapted]			
QRE 29.2.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
QRE 29.2.2 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			
QRE 29.2.3 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]			

SLI 29.2.1 [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters] Reach of stakeholders or citizens informed about the project
Data	
Measure 29.3	[insert wording if adapted]
QRE 29.3.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
	Methodology of data measurement [suggested character limit: 500 characters]
SLI 29.3.1 - reach of stakeholders or citizens informed about the outcome of research projects [change wording if adapted]	Reach of stakeholders or citizens informed about the project
Data	

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. [change wording if adapted]					
Measure 30.1	[insert wording if adapted]				
<b>QRE 30.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
<b>QRE 30.1.2</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
<b>QRE 30.1.3</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
SLI 30.1.1 - Member States and languages covered by					
agreements with the fact-checking organisations [change wording if adapted]	Nr of agreements with fact-checking organisations				
Data					
Measure 30.2	[insert wording if adapted]				
<b>QRE 30.2.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
QRE 30.2.2 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
QRE 30.2.3 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
Measure 30.3	[insert wording if adapted]				
<b>QRE 30.3.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
Measure 30.4	[insert wording if adapted]				
QRE 30.4.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				

#### 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. [change wording if adapted]

Measure 31.1	[insert wording if adapted]					
Measure 31.2	[insert wording if adapted]					
<b>QRE 31.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]					
SLI 31.1.1 - use of fact-checks [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters]					
	Nr of fact-checked articles published         Reach of fact-checked fact-checked         Nr of content pieces reviewed by fact-checkers         Other				Other	
Data						
SLI 31.1.2 - impact of actions taken [change wording if	Methodology of data measurement [suggested character limit: 500 characters]					
adapted]	Nr of pieces of content labelled         Impact of said measures on user interactions with information labelled as false or misleading         Other					
Data						
SLI 31.1.3 – Quantitative information used for contextualisation	Methodology of data measurement [suggested character limit: 500 characters]					
for the SLIs 31.1.1 / 31.1.2 [change wording if adapted]	Denominator to be decided	d within th	e TF ahead of the b	baseline report		
Data						
Measure 31.3	[insert wording if adapted]					
<b>QRE 31.3.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]					
Measure 31.4	[insert wording if adapted]					
<b>QRE 31.4.1</b> [insert wording if adapted]	Outline relevant actions [su	uggested c	haracter limit: 200	0 characters]		

# 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. [change wording if adapted]

Measure 32.1	[insert wording if adapted]
Measure 32.2	[insert wording if adapted]

<b>QRE 32.1.1</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				
SLI 32.1.1 - use of the interfaces and other tools [change	Methodology of data measurement [suggested character limit: 500 characters]				
wording if adapted]	Monthly users Other Other				
Data					
Measure 32.3	[insert wording if adapted]				
QRE 32.3.1 [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]				

VII. Empowering the fact-checking community	
Commitment 33 Relevant Signatories (i.e. fact-checking organisations) commit to operate on the basis of strict ethical and transparency rules, and to protect their independence. [change wording if adapted]	
<b>QRE 33.1.1</b> [insert wording if adapted]	<ul> <li>Relevant Signatories will report on the status of their membership to instruments such as those mentioned in Measure 33.1 and the actions taken as a result of that to ensure strict ethical and transparency rules, and to protect their independence .Outline relevant actions [suggested character limit: 2000 characters]</li> <li>Both Pagella Politica and Facta (PP/Facta) are active members of the IFCN network and verified signatories of its Code of Principles: <ul> <li>PP has been a verified member since 2017, compliance with IFCN principles is reviewed and assessed annually, last assessment has been in May 2022, next one in May 2023.</li> <li>Facta was born in 2020 and has been a verified member since 2021, was pledged compliant in 2022 and next assessment is going to be in July 2023.</li> </ul> </li> <li>PP/Facta are also among the founding members of the European Fact-Checking Standards Network (EFCSN), and members of its Governance Body.</li> <li>Applications to become verified members of the EFCSN Code have opened at the beginning of January 2023 and PP/F will submit their application within that first month.</li> <li>Pagella Politica and Facta already abide by ethical, transparency and independence rules as certified annually by IFCN Code of principles external evaluators. At the moment, both PP and F are updating their internal methodologies, norms and procedures in order to comply with EFCSN's Code of Standards.</li> </ul>
SLI 33.1.1 - number of European fact-checkers that are IFCN-certified [change wording if adapted]	Relevant Signatories will report on the number of European fact-checkers that are IFCN-certified or are members of the future Code of Professional Integrity.

	<ul> <li>The complete list of verified signatories of the IFCN Cod https://ifcncodeofprinciples.poynter.org/signatories. As</li> <li>Council of Europe + Kosovo are as follows: <ul> <li>Verified active signatories: 44</li> <li>Under renewal: 12</li> <li>Expired 18</li> </ul> </li> <li>For EFCSN, being members of the consortium that work Governance Body, PP/Facta have a good knowledge and As of January 2023,, EFCSN is accepting applic to evaluate them.</li> </ul>	of January 2023, signatories from EU member States + ed on the creation of the Code and members of its
Data		

VIII. Transparency Centre	
Commitment 34	
To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website. [change wording if adapted]	
Measure 34.1	[insert wording if adapted]
Measure 34.2	[insert wording if adapted]
Measure 34.3	[insert wording if adapted]
Measure 34.4	[insert wording if adapted]
Measure 34.5	[insert wording if adapted]

VIII. Transparency Centre	
Commitment 35	
Signatories commit to ensure that the Transparency Cent Measures and that this information is presented in an easy	re contains all the relevant information related to the implementation of the Code's Commitments and -to-understand manner, per service, and is easily searchable. [change wording if adapted]
Measure 35.1	[insert wording if adapted]
Measure 35.2	[insert wording if adapted]
Measure 35.3	[insert wording if adapted]
Measure 35.4	[insert wording if adapted]

Measure 35.5	[insert wording if adapted]
Measure 35.6	[insert wording if adapted]

VIII. Transparency Centre	
	Commitment 36
Signatories commit to updating the relevant information	contained in the Transparency Centre in a timely and complete manner. [change wording if adapted]
Measure 36.1	[insert wording if adapted]
Measure 36.2	[insert wording if adapted]
Measure 36.3	[insert wording if adapted]
<b>QRE 36.1.1 (for the Commitments 34-36)</b> [insert wording if adapted]	<ul> <li>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.</li> <li>This information can be drafted jointly by Signatories involved in operating or adding content to the Transparency Centre.</li> <li>Outline relevant actions [suggested character limit: 2000 characters]</li> <li>Pagella Politica and Facta are not members of the subgroup in charge of the development of the Transparency Centre but we think that this is an initiative of paramount importance also for our work and will keep an eye on its development. Pagella Politica and Facta will wait to receive its log in (as it is foreseen) in order to upload the information in their reports on the Transparency Centre.</li> </ul>
<b>QRE 36.1.2 (for the Commitments 34-36)</b> [insert wording if adapted]	Outline relevant actions [suggested character limit: 2000 characters]
SLI 36.1.1 - (for Measures 34 and 36) meaningful quantitative	Methodology of data measurement [suggested character limit: 500 characters]
information on the usage of the Transparency Centre, such as the average monthly visits of the webpage [change wording if adapted]	Our company would like to provide following data:
Data	

IX. Permanent Task-Force
Commitment 37

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

Measure 37.1	[insert wording if adapted]
Measure 37.2	[insert wording if adapted]
Measure 37.3	[insert wording if adapted]
Measure 37.4	[insert wording if adapted]
Measure 37.5	[insert wording if adapted]
Measure 37.6	[insert wording if adapted]
<b>QRE 37.6.1</b> [insert wording if adapted]	Signatories will describe how they engage in the work of the Task-force in the reporting period, including the sub-groups they engaged with. Outline relevant actions [suggested character limit: 2000 characters] Pagella Politica and Facta participated in the crisis management sub-group by sharing knowledge about the state of disinformation with the other participants, in particular on the two main current crises (pandemic and war in Ukraine). We have shared the information in our possession on the situation at Italian level, and also at the European level, thanks to PP/F position of coordinators of the fact-checking network within EDMO. That role allows us to access information from all over Europe, which we then materially aggregate, analyse and translate in the monthly EDMO briefs. PP/F also provided insights – potentially useful for platforms? – on the single most worrying cases of disinformation detected (e.g. lastly, the documentary on Covid-10 vaccines, "Died suddenly") and on some recurring phenomena (e.g. the frequent use, by disinformation, of videos and images old and taken up in another context to spread false news about current events). PP/F have also made suggestions of how platforms can better collaborate with f-cs on crisis management.

X. Monitoring of Code	
	Commitment 38
The Signatories commit to dedicate adequate fin their commitments under the Code. [change word	nancial and human resources and put in place appropriate internal processes to ensure the implementation of ling if adapted]
Measure 38.1	[insert wording if adapted]
<b>QRE 38.1.1</b> [insert wording if adapted]	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.

Pagella Politica and Facta have a number of internal staff dedicated to following the CoP and related developments, participating in TaskForce subgroups, and ensuring internal compliance with the commitments. Staff members are also committed to ensuring cooperation with fellow fact-checkers on key related issues, until EFCSN will become official signatory of CoP
Outline relevant actions [suggested character limit: 2000 characters]

#### X. Monitoring of Code

## Commitment 39

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

# X. Monitoring of Code

# Commitment 40

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

Measure 40.1	[insert wording if adapted]
Measure 40.2	[insert wording if adapted]
Measure 40.3	[insert wording if adapted]
Measure 40.4	[insert wording if adapted]
Measure 40.5	[insert wording if adapted]
Measure 40.6	[insert wording if adapted]

X. Monitoring of Code	
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. [change wording if adapted]

Measure 41.1	[insert wording if adapted]
Measure 41.2	[insert wording if adapted]
Measure 41.3	[insert wording if adapted]

#### X. Monitoring of Code

#### Commitment 42

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

#### X. Monitoring of Code

#### Commitment 43

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

#### X. Monitoring of Code

### Commitment 44

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