Code of Practice on Disinformation – Report of Seznam.cz for the period from 1st of September 2022 to 31st of December 2022

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Executive summary

Seznam.cz started as a tech company, but over the years, it has evolved into a prominent media house and the most extensive Czech online platform.

With the aim to deliver innovative products and services, as well as quality journalism, we strive to remain at the forefront of the digital landscape and build healthier and safer infospace.

The goal of this report is to provide information and understanding of how Seznam.cz approaches misinformation and disinformation on the following platforms: **Seznam Search**, **Seznam Newsfeed**, **and Discussions**. This report provides an overview of the policies, enforcement tools, procedures, and partnerships with fact-checkers and independent partners for media quality ratings that we have developed to address misinformation and disinformation on our platforms to fulfill our commitments under the Code.

We are dedicated to intensifying efforts to ensure the **integrity of our services** by implementing and promoting safeguards against both misinformation and disinformation. We have strict policies tackling impermissible manipulative behaviours and practices on our services, including the policies countering manipulative practices for AI. Our long-term goal is to promote transparency to our users regarding these polices, as well as accountability on impermissible manipulative and inauthentic behaviours and practices across our services. **We combine both humans and technologies** to implement and enforce these policies, elevate authoritative information and high-quality content, promote good journalism and moderate discussions.

While we also see the value in exchange of information on cross-platform influence operations, foreign interference in information space and relevant incidents that emerge on our respective services, we needed more time to build up HR capabilities to engage with other Signatories. We are going to take action to implement respective commitments in near future.

We recognize the importance of **empowering users** to detect and report false and/or misleading content as a key tool to limit the impact of disinformation.

It is vital for us to have strong partners in our users, so we develop media literacy and critical thinking of public and our partners at scale by user guidelines, fact-checking, warnings with educational explanation, links to credible sources, promotion of quality journalism and elevation of quality content in our ranking systems. At the same time, we provide users and partners with features to easily report problematic content and personalize their user experience.

Being aware of the risks of viral propagation of disinformation we minimize the risk by adopting safe design practices and by developing our systems, policies, and features accordingly.

Our steadfast partnership with impartial civic and academic institutions ensures a fair and objective rating of the media outlets we aggregate, rank, and display within our services and sites. In addition, we are planning to invest in fact-checking technology research in partnership with Brno University of Technology, so we will address our research efforts, both in-house and in partnership with third-party organizations on the spread of harmful disinformation online in the next report.

Our guiding principles when it comes to addressing disinformation on platforms and services included in this report are:

- Safe search & browser
- Newsfeed that promotes good journalism
- Discussions free of hate speech and disinformation

Seznam.cz is a strong local player on the Czech market with limited presence on other EU markets. Thus, we do not provide data for individual countries, but aggregated data for respective services.

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	
QRE 14.1.1 [insert wording if adapted]	Seznam Search systems prioritize high-quality and authentic information sources to
	provide users with the most relevant content and best user experience. At the same
	time, we reduce the reach of low-quality content, often spread through deceptive or
	manipulative behavior listed in Commitment 14, by spam detection tools. While these
	measures address TTPS relevant for search engines (e.g. inauthentic domains or
	Inauthentic coordination of content creation or amplification) at a high volume, we also

warn users against particular disinformation websites that can spread fake news and hoaxes. Warnings flagging untrustworthy content appear to users in the natural search results under the link to specific disinformation websites, and we do not display images and videos from these domains.

Seznam Newsfeed has <u>policies</u> for what can appear in the service to promote quality journalism and trustworthy news. Independent Media Rating published by the Foundation for Independent Journalism (NFNZ) is mandatory for all news websites displayed in Seznam Newsfeed. Websites that disseminate or contribute to the dissemination of disinformation or conspiracy theories are excluded from the service. We also have a policy to limit "clickbait" headlines and other deceptive and manipulative practices. Furthermore, we provide <u>Guidelines</u> for our partners and require compliance with standards for information sourcing on all websites displayed in Seznam Newsfeed. To avoid deceptive and manipulative media, we insist that the reader must be able to trace the source of the information and make judgment on its credibility. There are even tighter rules in place for news and articles on health and scientific topics.

Discussion platform <u>policies</u> require users to appear under their real identity to address inauthentic and deceptive behaviors listed in Commitment 14. Fake accounts are not allowed at the service, and we have several levels of verification that apply proportionally to the behavior and reach of a particular account. We further limit deceptive practices by prohibiting content that impersonates any physical person or organization and engaging in inauthentic or coordinated behavior to deceive or mislead. Any content in breach of both private and public law is forbidden on the platform. We pay special attention to content that incites hatred towards individuals or groups of the population based on racial or religious affiliation and nationality. On top of that, vulgar or obscene language or vulgarity by description, slanders, and threats of violence are prohibited as well.

	We also limit the spread of spam and other TTPs listed in Commitment 14. by targeting content with specific dubious features (e.g. capital letters, special characters, etc.), reappearing content, and content that spread misinformation and disinformation or including links to such websites. However, it is our policy to provide fact-checking and explanatory comments instead of simply removing the post or banning the account. Last but not least, we aim to prevent people from abusing our platform for commercial gain, and we remove content that shares personally identifiable information or other private information obtained from illegal sources or published without consent.
QRE 14.1.2	Seznam Search uses both machine learning and humans to prioritize high-quality and authentic content and reduce the reach of low-quality content, often spread through deceptive or manipulative behavior listed in Commitment 14. More information on how Seznam search works can be found <u>here</u> . Seznam Search also uses various external sources (EU Guidelines, National Center for Cybernetic Operations, the Foundation for Independent Journalism, the Atlas of Conspiracies project, the Slovak initiative Konspiratori.sk and the company Semantic Visions) to identify and flag disinformation websites and display appropriate warnings.
	Seznam Newsfeed uses a combination of people and technology to evaluate quality of content. Every day, around 3,000 texts are submitted to the Newsfeed service by partner websites. About 2,000 of these texts are published after being automatically checked and pre-categorized using tools such as clickbait headline detection or topic specificity classifier. Additionally, almost half of the submitted texts undergo a manual review process by trained editors. We provide our editors with detailed internal guidelines and use independent Media Rating published by the Foundation for Independent Journalism to evaluate submitted articles. Websites with the Media Rating B- and C are excluded from the Newsfeed. We also exclude approx. 300 websites that are currently listed by the Foundation for Independent Journalism or Konspiratori.sk as misinformative.

	Only quality journalism is published automatically, but with editorial oversight. Based on the common standards of quality journalism, we have introduced a stricter obligation to source factual information and quotations properly even in texts that do not qualify as news (including blog posts). Only the outlets ranking highest in NFNZ MediaRating are allowed to publish their contents directly in our Newsfeed. However, their articles are also checked retroactively by automated tools and human editors.
	Discussion platform, to combat TTPs, relies on technology, and human editors assessing content, as well as fact-checkers moderating discussions. We equipped editors with comprehensive internal guidelines and fact-checkers with prepared responses to the most common misinformation and disinformation narratives and TTPs. Our editors verify/ban fake accounts, and accounts that deploy TTPs or otherwise violate our policy. Our fact-checkers comment with explanatory notes and
	links to credible sources of information. However, our approach is focused on the behavior evaluation of each actor. We are looking for specific patterns of behaviors exhibited by malicious actors, and not only for violating content. Whenever possible we prefer to correct the information and lead users with good intentions to credible sources of information. On the other hand, we pay special attention to the most common disinformation narratives and TTPs deployed by malicious actors and apply stricter sanctions.
	by malicious actors and apply stricter sanctions. E.g. Following the onset of the war in Ukraine, we began banning accounts that consistently disseminated pro-Russian narratives, hate speech against Ukrainians, and support or justification for the Russian invasion. While the majority of misinformation we currently address relates to the war in Ukraine, we also tackle myths about NATO's intervention in former Yugoslavia, COVID- 19 and vaccines, Czech politics, LGBTIQ+ hoaxes, and more.
Measure 14.2	•

QRE 14.2.1	Seznam Search key tool to counter misinformation and disinformation is the elevation of high-quality and authentic content and reduction of exposure to low-quality content via a ranking system. In addition, we use a risk-based approach to misinformation and disinformation websites that appear in Seznam Search results. We base our findings on independent sources and display relevant warnings accordingly:
	 Blocked illegal content based on EU guidelines: The strictest red no-click- through message. We don't allow users to click through to target website, even if it appears in search results. Blocked security threats based on the Czech National Center for Cyber Operations (NCKO): The second strictest red message with two-step click- through. We allow click-through, but alert users to make sure they are aware of the risks. Flagged misinformation based on the independent media ratings (NFNZ, Konspiratori.sk, Semantic Visions, Atlas of Conspiracies): The less strict orange warning that alerts users before visiting a known misinformation website. An optional box explains why a particular site is problematic. In case the guidelines overlap or contradict, we follow the stricter rule. We do not display images or videos from the domains listed above in our search results.
	Seznam Newsfeed relies on a combination of people and technology to enforce Seznam Newsfeed <u>policies</u> . All texts are checked and pre-categorized by technology, using e.g. clickbait headline detection tools. Majority of the articles submitted are consequently checked by human editors to ensure the policy rules are followed. Additionally, we work closely with our partners to educate them on our policies and help them to comply. For more details see <u>Guidelines on information sourcing</u> , <u>Q&A</u> <u>Why my article is not on the Newsfeed</u> , <u>Guidelines NFNZ rules</u> , and <u>Guidelines on</u> <u>NFNZ Media rating</u> .

	Discussion platform policies are enforced by technology and human editors/fact-
c	heckers on day to day bases.
	1) Comments containing vulgarisms and links to misinformation sites are filtered
	automatically and cannot be posted.
	2) We empower and make it easy for users to report any content that violates
	policies. They are further assessed by our editorial team.
	3) Our systems automatically flag content containing specific keywords to be
	further assessed by the editorial team. Our team of editors & fact-checkers
	adds explanations and gives context to manipulative comments.
	4) We strictly take down and ban severe spread of misinformation, hate speech
	and other illegal content. We, however, try to take down as few posts as
	possible. When user comments are manipulative or misleading, our editors
	provide context, explain & debunk manipulations.
v	We also implemented a risk-based internal procedure for our editors to deal with
ν	violations, prioritizing flagged and potentially harmful content.

SLI 14.2.1 – SLI 14.2.4						
P OR CTION 1 eplicate r number	Seznam Search Risk-based approach to misinformation and	l disinformation web	sites that ap	ppear in Seznam Search	results	
f TTPs or ctions eported]	Website category	Number of (disinformation) websites in each category	Quarter	Number of displays of the sites in respective category (top 10 results)	Number of displays with at least one of the sites in respective category (one or more sites displayed = only 1 instance)	
	CATEGORY 3 (orange warning with	16	Q3 2022	927,055	478,768	
	click- through enabled + explanatory pop-up)		Q4 2022	1,089,087	599,683	
	CATEGORY 2 (red warning with click-	22	Q3 2022	871,558	664,835	
	through consent + explanatory pop-up)		Q4 2022	1,517,520	1,100,437	
	CATEGORY 1 (red warning with click-	4	Q3 2022	7,238	4,025	
	through disabled + explanatory pop-up)		Q4 2022	5,037	2,618	

Discussion platform

Moderating and fact-checking of discussion

Quarter	Number of comments taken down	Number of Discussions users banned permanently with the request to prove their ID ("fake accounts")	Number of Discussions users banned permanently for any reason	Number of comments fact- checked by editors
Q3 2022	90,290	4,955	5,130	540
Q4 2022	90,416	3,597	3,702	656

Seznam Newsfeed

Articles checked and rejected by human editors

Quarter	Articles checked by human editors	Articles rejected by human editors		
Q3 2022	151,647	13,986		
Q4 2022	156,949	10,251		

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	
QRE 15.1.1	 Seznam.cz develops and operates all AI systems in line with existing EU and national laws, while taking into consideration future legal and technical challenges. As a CMP company and the biggest online news media house in the Czech Republic, we pay special attention to use of AI system in journalistic context. Being aware of the advantages and pitfalls of generative AI, that can help humans to create both quality media content as well as deepfakes and misinformation at scale, we see self-regulatory framework for news editors crucial to fight misinformation and disinformation. Thus, Seznam News published clear <u>rules</u> binding for editorial staff on using AI tools. In the same way, we prohibit "automatically generated and robotically translated content" in Seznam Newsfeed policies and use clickbait classifier and trained human editors to filter AI generated content and deepfakes. Following this further, we support the transparency obligations in the proposal for Artificial Intelligence Act, including transparency obligations related to foundation models and transparency on use of copyright-protected works (e.g. journalistic or academic texts, images or sounds). A clear requirement on declaring sources by AI developers would decrease discrimination and quality of data risks, protect personal data, and enable users to verify sources of information.

V. Empowering Users						
	Commitment 17					
	n 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 trengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups.					
Measure 17.1						
QRE 17.1.1	While Seznam.cz aims to develop media literacy and critical thinking of general public at scale by policies and actions described under commitment 14 (e.g. Discussion platform fact-checking, Seznam Search warnings with educational explanation, or Seznam Newsfeed promotion of quality journalism) it continues and strengthen activities in the area of media literacy and critical thinking targeted on specific groups. To improve media literacy and critical thinking of upcoming generations Seznam.cz runs the <u>"Get to Know Media"</u> program for elementary and high school teachers. To improve media literacy and critical thinking of elder people, who are particularly vulnerable in online environment, Seznam.cz runs the program <u>"Sherlock Senior"</u> design for people in retirement age.					
SLI 17.1.1 - actions enforcing policies above	Data on displayed warnings with educational explanation in Seznam Search , data on the way we promote quality journalism in Seznam Newsfeed , and data on fact-checking on Discission platform can be found in the SLI 14.2.1 – SLI 14.2.4					
Measure 17.2						
QRE 17.2.1 [insert wording if adapted]	Media literacy for teachers and kidsIn 2019, Seznam started the <u>"Get to Know Media"</u> program for elementary and high school teachers. In partnership with a renowned expert, Michal Kaderka from the					

	Charles University, we created a comprehensive and practical methodology for teaching media literacy at schools. Our aim is to elevate knowledge about workings of the media, train fact-checking skills, and educate social media algorithms, misinformation, manipulation, porn, advertising, and other important topics. In addition, we run free online courses for Czech teachers and provide them with educational materials to be used in classes. Media literacy for elderly people Media literacy project <u>"Sherlock Senior"</u> focuses on elderly people. These training also developed in partnership with Michal Kaderka. The aim of the project is to educate seniors on how news is made, how social med work, and how hoaxes are debunked. We pay special attention to chain emails that are a major source of misinformatio among the elderly. Besides the trainings, we also publish a monthly digest of hoax spread by email.				act-checking ation, porn, e them with hese trainings are ow social media
SLI 17.2.1 - actions enforcing policies above	Data on Seznam	.cz media literacy	y projects		
	Nr of media literacy/ awareness raising activities organised/ participated in	Reach of campaigns	Nr of participants	Nr of interactions with online assets	Nr of participants (etc)
Data	2 long-term programs and 1 media festival	-	3878	-	

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.

Measure 18.1	
QRE 18.1.1	 Seznam Discussion platform minimise the risks of viral propagation of disinformation by adopting and enforcing its policies described in detail under Commitment 14 and by implementing a risk-based internal procedure for editors to prioritize action against viral disinformation and misinformation content. To minimize the risks of viral propagation of disinformation Seznam Discussion platform adopted following safe design practices and features: Comments containing links to misinformation sites are filtered automatically and cannot be posted; Users are empowered with feature to easily report such content; Our systems automatically flag content that includes specific keywords; 4) Editors take down and ban severe spread of misinformation, hate speech and other illegal content as fast as possible.
	Seznam Newsfeed platform minimise the risks of viral propagation of disinformation by adopting and enforcing <u>policies</u> for what can appear in the service described in detail under Commitment 14. All texts are checked and pre-categorized by technology, using e.g. clickbait headline
	detection tools and only quality journalism is published automatically, but with editorial oversight. About half of the articles submitted are consequently checked by human editors to ensure the policy rules are followed and <u>violating content doesn't</u> <u>appears on Seznam Newsfeed.</u>

QRE 18.1.2	In addition, we empower our users with Recommender modifiers. By pressing X on our homepage, users can: a) hide entire news outlet; b) express they are not interested in such content and downgrade it; c) report article as misleading or false.	
	Information of Seznam Newsfeed recommender can be found here	
QRE 18.1.3	Seznam Search prioritizes high-quality and authentic information sources to provide users with the most relevant content and best user experience. A risk-based approach is in place to further reduce users engagement with disinformation websites that appear in Seznam Search results by displaying relevant warnings described in details under commitment 14.	
	Seznam Newsfeed reduces the engagement with disinformation by adopting and enforcing <u>policies</u> for what can appear in the service described in detail under Commitment 14.	
	All texts are checked and pre-categorized by technology, using e.g. clickbait headline detection tools and only quality journalism is published automatically, but with editorial oversight. About half of the articles submitted are consequently checked by human editors to ensure the policy rules are followed and <u>violating content doesn't appears on Seznam Newsfeed.</u>	
	Discussion platform reduce the engagement with disinformation by adopting and enforcing its <u>policies</u> described in detail under Commitment 14. However, we put emphasis on debunking of disinformation, providing context and credible sources of information by our fact-checkers.	

SLI 18.1.1 - actions proving effectiveness of measures and policies	Data on website categories and appropriate warnings in Seznam Search , data on articles checked and rejected by human editors in Seznam Newsfeed , and data on fact-checking on Discission platform can be found in the SLI 14.2.1 – SLI 14.2.4
Measure 18.2	
QRE 18.2.1	 Seznam Newsfeed has policies, described in detail under Commitment 14, for what can appear in the service to limited spread of harmful false or misleading information and to ensure violating content doesn't appear on Seznam Newsfeed. Websites that disseminate or contribute to the dissemination of disinformation or conspiracy theories are excluded from the service. In future we plan to deploy a new recommender system (Aura) that will continuously measure average quality of each website in Seznam Newsfeed. The quality will influence the position in recommendation system. Discussion platform policies prohibits any content in breach of both private and public law. Any content that incites hatred towards individuals or groups of the population based on racial or religious affiliation and nationality is also prohibited. We have several levels of verification that apply proportionally to the behavior and reach of a particular account and harmful content spread through the account. Editors take down severe spread of misinformation, hate speech and other illegal content and ban accounts that persistently violate these policies. Links to misinformation sites are filtered automatically and cannot be posted.
SLI 18.2.1 - actions taken in response to policy violations	Data on displayed warnings in Seznam Search , data on articles checked and rejected by human editors in Seznam Newsfeed , and data on moderating measures and fact- checking of Discission platform can be found in the SLI 14.2.1 – SLI 14.2.4

V. Empowering Users **Commitment 19** Relevant Signatories using recommender systems commit to make them transparent to the recipients regarding the main criteria and parameters used for prioritising or deprioritising information, and provide options to users about recommender systems, and make available information on those options. Measure 19.2 SLI 19.2.1 – user settings Seznam Newsfeed We provide users with a feature to adjusts the recommender system. By pressing X user is empowered to: a) hide entire news outlet ("Show me less content from this medium") b) express they are not interested in such content and downgrade it ("Article is not interesting") c) report article as misleading or false ("Report this article") Clicks on the X and following actions: Quarter "Show me less content from "Article is not interesting" "Report this article" this medium" Q3 2022 858,727 849,738 249,759 Q4 2022 792,422 887,743 247,386

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	
QRE 21.1.1	Seznam.cz is committed to strengthen efforts to better equip users to identify disinformation. We facilitate users across our services access to information from fact-checkers and fact- checking organizations as explained in detail under commitment 14. Our steadfast partnership with impartial civic and academic institutions ensures a fair and objective rating of the media outlets we aggregate, rank, and display within our services and sites. <u>The Endowment Fund for Independent Journalism</u> (NFNZ) provides us with their MediaRating. This rating system, derived from extensive research carried out by experts at Charles University, ensures that we refrain from publishing news from websites that fail to satisfy the established criteria. <u>NFNZ MediaRating methodology is available here</u> In partnership with NFNZ and other independent evaluators, such as Konšpirátori.sk and Nelež, we also identify, flag, and offer our users the option to blacklist misinformation sites within our services. <u>NFNZ misinformation sitelist</u> <u>Konšpirátori.sk list misinformation sitelist</u> <u>Nelež misinformation sitelist</u> Finally, we closely monitor emerging misinformation narratives to counter them on Seznam discussion platform, threads, and other services. We use expertise of independent bodies

	such as Charles University's Atlas of Conspiracies, AI-powered Semantic Visions tool and Czech Elves.			
SLI 21.1.1 - actions taken under measure 21.1	Seznam Newsfeed	Seznam Newsfeed Use of independent media ratings		
Data	Use of independent media ratings			
	Independent fact-checkers		Number of websites listed by independent rating bodies	
	Websites with news rating (NFNZ)	Websites with news rating (NFNZ)Websited rated for regional news (NFNZ)Disinformation websites not allowed in SeznamNewsfeed (cross-section of NFNZ, Konspiratori.sk and Atlas konspiraci)		
	Newsfeed (cross-section of NFNZ, Kons			
	Atlas konspiraci)			
	Discussion platform Fact-checks provided to users based on cooperation with independent fact-checkers			
	Quarter		ct-checks produced by human on independent fact-checking	
	Q3 2022	87		
	Q4 2022	19		
		•		