

Code of Practice on
Disinformation – Report of
Vimeo for the period
1 January 2023 –
31 December 2023

Executive summary

Executive summary (max. 2 pages)

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

Vimeo is not a social media platform that enables or encourages user engagement in the way social media platforms do. Therefore, we do not commit to the following as they are not relevant to our services:

- SLI 14.2.2
- SLI 14.2.3
- SLI 14.2.4

<p>QRE 14.1.1 [insert wording if adapted]</p>	<p>Vimeo has clear policies on disinformation. Section 5 of our Terms of Service lists the types of content that users may not submit to our platform, including specific language prohibiting disinformation. This list prohibits content that:</p> <ul style="list-style-type: none"> ● Contains false or misleading claims about (1) vaccination safety, or (2) health-related information that has a serious potential to cause individual or public harm; ● Contains false or misleading information about voting or seeks to obstruct voting; ● Contains (1) claims that a real-world tragedy did not occur; (2) false claims that a violent crime or catastrophe has occurred; or (3) false or misleading information (including fake news, deepfakes, propaganda, or unproven or debunked conspiracy theories) that creates a serious risk of material harm to a person, group, or the general public; or ● Violates any applicable law. <p>The TTPs employed by malicious actors we saw on our platform in 2023 are:</p> <ul style="list-style-type: none"> ● Impersonation ● Malicious deep fakes <p>This is addressed in our Acceptable Use Policy, Section 5 of our Terms of Service, which prohibits:</p> <ul style="list-style-type: none"> ● Content that infringes any third party’s copyrights or other rights, including impersonations; and ● Content that contains false or misleading information (including fake news, deepfakes, propaganda, or unproven or debunked conspiracy theories) that creates a serious risk of material harm to a person, group, or the general public. <p>Further, Vimeo’s Terms of Service, Section 5.3 prohibits users from doing the following (in addition to other activities):</p> <ul style="list-style-type: none"> ● Act in a deceptive manner or impersonate any person or organization; ● Distribute “spam” in any form or use misleading metadata; ● Access another’s account except as permitted herein; ● Use or export any of our Services in violation of any U.S. law; ● Engage in any unlawful activity; ● Embed our video player on or provide links to sites that contain content prohibited by Section 5.2; or ● Cause or encourage others to do any of the above. <p>In our Acceptable Use Community Guidelines, which explain in detail how we interpret and enforce our Terms of Service, we explain that Section 5.3 (above) sets rules that bar users from (among other things) harassing other users, interfering with our technical measures, spamming, or engaging in inauthentic behavior. “Spamming” includes mass distribution of the same or similar content, content containing links intended to sell the user some dubious item, and the use of bots, scripts, or other automated tools for any purpose. “Inauthentic behavior” includes creating fake accounts, liking or commenting on your own content using another account, and purchasing likes or comments from third-parties.</p>
<p>QRE 14.1.2 [insert wording if adapted]</p>	<p>We enable users to flag content that may violate our content restrictions. We review content that is flagged by our users, third parties, and certain software-based systems and tools.</p>
<p>Measure 14.2 [insert wording if adapted]</p>	<p>As described above, we are meeting this commitment. See our Terms of Service (Section 5) and Acceptable Use Community Guidelines.</p>
<p>QRE 14.2.1 [insert wording if adapted]</p>	<p>As explained above.</p>

SLI 14.2.1 – SLI 14.2.4												
TTP OR ACTION 1 [replicate for number of TTPs or actions reported]	For the covered period, we did not detect any bot/ATO attacks related to the spread of misinformation on our platform. Vimeo does not maintain data specific to EU member states or the EU as a whole for actions taken for misinformation.											
	SLI 14.2.1											
	Nr of instances of identified TTP	Nr of actions taken by type										
Data	n/a	n/a										

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												
QRE 16.1.1 [insert wording if adapted]												
Vimeo is part of the Crisis Response Subgroup. Vimeo has participated in several calls with representatives of other small signatories to make this more relevant to small platforms like Vimeo. In the future, Vimeo will find additional value from these interactions in the following areas: - how to increase the effectiveness of operational team by helping them stay up to date on trending narratives/language so they have a better awareness of what to watch for - how to track actors/organizations who are deplatformed from larger (VLOP) services as they attempt to move to small(er) services - Practical tips for tracking election-related misinformation, particularly to share information with small/medium-sized services to track accurate information about various elections, particularly smaller elections.												
SLI 16.1.1 – Numbers of actions as a result of information sharing [change wording if adapted]												
n/a												
n/a												
Data												
n/a												

Measure 16.2	
QRE 16.2.1 [insert wording if adapted]	n/a

V. Empowering Users					
Measure 17.2	Where appropriate given the nature of our services, we will support media literacy and critical thinking activities.				
QRE 17.2.1 [insert wording if adapted]	None for the covered period.				
SLI 17.2.1 - actions enforcing policies above [change wording if adapted]	Methodology of data measurement [suggested character limit: 500 characters]				
	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	n/a				

V. Empowering Users	
Commitment 23	
Relevant Signatories commit to provide users with the functionality to flag harmful false and/or misleading information that violates Signatories policies or terms of service. [change wording if adapted]	
Measure 23.1	
QRE 23.1.1 [insert wording if adapted]	<p>Users that encounter behaviour or content that violates our Terms of Service, including that which contains misinformation or disinformation, may report it by either flagging it (where provided) or contacting us. Our Reporting Abuse article explains in detail how to report abuse and violations for content that is available to the public on Vimeo.com.</p> <p>To report content:</p> <ol style="list-style-type: none"> 1. Navigate to the video page in question. 2. Click the Flag in the bottom right corner of the player section (on the black background). <p>To report an account:</p> <ol style="list-style-type: none"> 1. Navigate to their profile page 2. Click the Flag icon in the bottom left corner of the page. <p>To report a spammer, users can click the flag icon at the bottom left corner of their profile page.</p> <p>If users receive unwanted attention in the form of messages or shared videos containing misinformation or</p>

	<p>disinformation, they can:</p> <ul style="list-style-type: none"> • Send that user a message asking them to refrain from contacting them on Vimeo • Block them • Contact us for help
Measure 23.2	
QRE 23.2.1 [insert wording if adapted]	The number of reports/flags a piece of content receives is not relevant to whether it will be reviewed for violations to our Terms of Service. All videos that are reported/flagged (whether it is one or 500 times) will be reviewed. Any time there is a report/flag, the content in question is reviewed for violations of our ToS before removing. Videos with a higher number of flags may be reviewed first, but the process is the same for all to ensure we make the right decision.

V. Empowering Users

Commitment 24

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

Measure 24.1				
QRE 24.1.1 [insert wording if adapted]	Users whose content is removed or account terminated receive an email from our T&S team explaining the reasons for our decision and stating the specific type of content restriction they violated. We do this for any content except for CSAM, terrorist content, fraud, spam, sextortion and illegal content. Users who contend we have mistakenly taken action on their account or content, can appeal our decision within six months using our Appeals Form [https://vimeo.com/help/contact].			
SLI 24.1.1 - enforcement actions [change wording if adapted]	No data available on the specific metrics for misinformation takedowns and appeals.			
	Nr of enforcement actions	Nr of actions appealed	Metrics on results of appeals	Metrics on the duration and effectiveness of the appeal process
Data				

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	In proportion to our resources and the risk our services pose in terms of disinformation and misinformation, we will make efforts to cooperate with the research community when we are approached.
QRE 27.1.1 [insert wording if adapted]	We have not been approached for this.
Measure 27.2	
QRE 27.2.1 [insert wording if adapted]	We have not been approached for this.
Measure 27.3	
QRE 27.3.1 [insert wording if adapted]	We have not been approached for this.
SLI 27.3.1 - research projects vetted by the independent third-party body [change wording if adapted]	n/a
	n/a
Data	
Measure 27.4	
QRE 27.4.1 [insert wording if adapted]	None.

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	Vimeo's Trust & Safety team will cooperate with the research community as much as possible, in the understanding that our resources are limited.
QRE 28.1.1 [insert wording if adapted]	None; we have not been approached for this.
Measure 28.2	
QRE 28.2.1 [insert wording if adapted]	None; we have not been approached for this.
Measure 28.3	
QRE 28.3.1 [insert wording if adapted]	None; we have not been approached for this.

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	
Measure 34.2	
Measure 34.3	
Measure 34.4	
Measure 34.5	

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. [change wording if adapted]	
Measure 35.1	
Measure 35.2	
Measure 35.3	
Measure 35.4	
Measure 35.5	
Measure 35.6	

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	
Measure 36.2	

Measure 36.3	
QRE 36.1.1 (for the Commitments 34-36) [insert wording if adapted]	
QRE 36.1.2 (for the Commitments 34-36) [insert wording if adapted]	The administration of the Transparency Centre website has been transferred fully to the community of the Code's signatories, with VOST Europe taking the role of developer.
SLI 36.1.1 - (for Measures 34 and 36) meaningful quantitative information on the usage of the Transparency Centre, such as the average monthly visits of the webpage [change wording if adapted]	The common Transparency Center has received around 35.000 views between July 1st 2023 and December 31st 2023. The average engagement time on the website is 1m11s and reports have been downloaded more than 9.000 times.
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	
Measure 37.2	
Measure 37.3	
Measure 37.4	
Measure 37.5	
Measure 37.6	
QRE 37.6.1 [insert wording if adapted]	<p>Vimeo is part of the Permanent Taskforce and participates regularly in meetings.</p> <p>Vimeo is also a part of these working subgroups and attends regularly scheduled meetings:</p> <ul style="list-style-type: none"> • Crisis Response Subgroup • Generative AI Subgroup • Monitoring and Reporting Subgroup <p>Separately, Vimeo works with representatives of smaller platforms to identify ways in which the work being done is more relevant to smaller platforms, similarly situated to Vimeo.</p>

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. [change wording if adapted]

Measure 38.1	
QRE 38.1.1 [insert wording if adapted]	Vimeo's Trust & Safety team includes 15 moderators who evaluate content violations on the platform, including mis- and disinformation. Our moderators deal with all types of content that is uploaded to the platform - they're not a team that is dedicated exclusively to deal with mis- and disinformation.

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 40.2	
Measure 40.3	
Measure 40.4	
Measure 40.5	
Measure 40.6	

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	
Measure 41.2	
Measure 41.3	

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]