

Subscription Document for the European Partnership for Democracy

Contents

II. Scrutiny of Ad Placements	4
III. Political Advertising	7
IV. Integrity of Services.....	13
V. Empowering Users.....	17
VI. Empowering the Research Community.....	23
VIII. Transparency Centre	29
IX. Permanent Task-force.....	32
X. Monitoring of the Code.....	34

Subscription Document

Name of the Signatory

European Partnership for Democracy

About the Signatory

The European Partnership for Democracy (EPD) is a network representing 21 democracy support organisations headquartered in Europe but operating globally. The EPD secretariat is split into three pillars: policy, research and programmes. As such, EPD brings expertise from a variety of angles, not just in terms of thematic expertise but also from different perspectives within the democracy support sector. Most relevant to the Code of Conduct on Disinformation, EPD has a strong and proven track record working on issues relating to digital democracy and information integrity, with several focus areas overlapping with key topics in the Code, including the transparency of targeted political advertising, the demonetisation of disinformation, and the inclusion of democratic standards in tech governance.

In 2024, EPD took up a coordination role among civil society to streamline input for the European Democracy Shield. This coordination group includes several signatories of the Code of Conduct with whom EPD collaborates closely. The EPD secretariat has put a strong focus on the need to properly implement the Digital Services Act and has advocated for the development of proper monetisation governance in order to demonetise disinformation.

EPD has also actively contributed to the discussions around the Regulation on the Targeting and Transparency of Political Advertising (TTPA) ever since its early development. EPD has engaged in consultations relating to its implementation, provided input to draft implementing acts, and published a series of analyses both throughout the TTPA's development and its current implementation.

As a network organisation, EPD not only has extensive expertise among its secretariat but also represents the varied experience and knowledge of its members, many of whom have done extensive work on countering disinformation and strengthening information integrity. (For more information: www.epd.eu/members)

II. Scrutiny of Ad Placements		
List of adopted commitments and measures ¹		Qualitative Reporting Elements and/or Service Level Indicators ²
<u>Commitment 1</u> Relevant Signatories participating in ad placement, commit to defund the dissemination of disinformation and misinformation, 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.		
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): <i>EPD commits to contribute to the improvement of monetisation transparency and policies, but the measures, QREs and SLIs related to this commitment are not relevant to EPD's work as it doesn't monetise content or engage in ad placements.</i>		

¹ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

² Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

III. Political Advertising		
List of adopted commitments and measures ³		Qualitative Reporting Elements and/or Service Level Indicators ⁴
<u>Commitment 4</u> Relevant Signatories commit to adopt a common definition of “political and issue advertising”.	Measure 4.1 Measure 4.2	
<u>Commitment 12</u> 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.	Measure 12.1 Measure 12.3	
<u>Commitment 13</u> Relevant Signatories agree to engage in ongoing monitoring and research to understand and respond to risks related to Disinformation in political or issue advertising.	Measure 13.1 Measure 13.3	
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): <i>EPD commits to all commitments and measures relevant to its work on political advertising, those that have been removed are not applicable to EPD’s work</i>		

³ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

⁴ Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

IV. Integrity of Services	
List of adopted commitments and measures ⁵	Qualitative Reporting Elements and/or Service Level Indicators ⁶
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): <i>These commitments are not relevant to the work of EPD as we don't operate our own information systems.</i>	

⁵ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

⁶ Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

V. Empowering Users

List of adopted commitments and measures ⁷		Qualitative Reporting Elements and/or Service Level Indicators ⁸
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): <i>While EPD works on strengthening information integrity, our concrete work on media literacy activities is limited. EPD will work in line with commitment 17, but is not able to commit to the measures at this moment in time. EPD will consider signing up to this commitment in the future when resources allow.</i>		

⁷ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

⁸ Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

VI. Empowering the Research Community

List of adopted commitments and measures ⁹	Qualitative Reporting Elements and/or Service Level Indicators ¹⁰
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): <i>These commitments do not apply to EPD's work as a civil society organisation</i>	

⁹ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

¹⁰ Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

VII. Empowering the Fact-Checking Community

List of adopted commitments and measures ¹¹	Qualitative Reporting Elements and/or Service Level Indicators ¹²
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): <i>These commitments are only relevant to platforms and fact-checking organisations, neither of which applies to EPD</i>	

¹¹ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

¹² Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

VIII. Transparency Centre

List of adopted commitments and measures ¹³		Qualitative Reporting Elements and/or Service Level Indicators ¹⁴
<u>Commitment 35</u> 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.	Measure 35.3	
<u>Commitment 36</u> Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner	Measure 36.1 Measure 36.2 Measure 36.3	
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): <i>As the website is already set up and being maintained, there doesn't seem to be any added value for EPD to join commitment 34</i>		

IX. Permanent Task-force

¹³ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

¹⁴ Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

List of adopted commitments and measures ¹⁵ <i>[Delete those that do not apply]</i>		Qualitative Reporting Elements and/or Service Level Indicators ¹⁶
<u>Commitment 37</u> 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 Taskforce are made by consensus.	Measure 37.1 Measure 37.2 Measure 37.3 Measure 37.4 Measure 37.5 Measure 37.6	
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): <i>EPD commits to all measures related to the Task Force</i>		

¹⁵ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

¹⁶ Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

X. Monitoring of the Code

List of adopted commitments and measures ¹⁷ <i>[Delete those that do not apply]</i>		Qualitative Reporting Elements and/or Service Level Indicators ¹⁸
<u>Commitment 38</u> 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.		
<u>Commitment 40</u> 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.	Measure 40.2 Measure 40.3 Measure 40.4 Measure 40.5 Measure 40.6	
<u>Commitment 41</u> Signatories commit to work within the Task-force towards developing Structural Indicators and deliver 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	Measure 41.1 Measure 41.2 Measure 41.3	

¹⁷ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

¹⁸ Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

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.		
<u>Commitment 42</u> 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 Task-force.		
<u>Commitment 43</u> Signatories commit to produce reports and provide data following the harmonised reporting templates and refined methodology for reporting and data disclosure as agreed in the Task-force.		
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): <i>EPD opts out of commitment 39 as it is only relevant to platforms</i>		

Full Name(s) and Signature(s) of the authorised representative(s):

Date and place:

Brussels, 11 August 2026

Mr Thijs BEMAN – Acting Executive Director, EPD

