

Subscription Document for WHAT TO FIX

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Subscription Document

Name of the Signatory

[Name of the Organisation subscribing to the commitments and measures]

WHAT TO FIX

About the Signatory

[Provide a description of the Organisation and of the relevant products, activities and services it offers, which are covered by the listed commitments and measures.]

[WHAT TO FIX](#) is a tech policy and accountability nonprofit dedicated to advancing internet integrity. Our work focuses on documenting and addressing systemic drivers of information harms, including the role of platform design and governance choices- particularly platforms' monetization systems- in shaping incentives and outcomes.

In practice, we have:

- developed and advanced the concept of **Monetization Governance** as an emerging accountability field;
- built public transparency infrastructure (including our [Meta Monetization Archive](#) and related [monetization.wtf](#) transparency portal) to make platform monetization practices inspectable and research evidence-based;
- conducted [investigations into platforms' monetization practices](#) and their compliance with the law and their own policies;
- facilitated a multi-stakeholder process to develop [Monetization Principles](#); and
- engaged [EU policy processes](#) to strengthen oversight and transparency obligations relevant to these systems.

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II. Scrutiny of Ad Placements		
List of adopted commitments and measures ¹ <i>[Delete those that do not apply]</i>		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.		
<u>Commitment 2</u> Relevant Signatories participating in advertising commit to prevent the misuse of advertising systems to disseminate misinformation or disinformation in the form of advertising messages.		
<u>Commitment 3</u> Relevant Signatories involved in buying, selling and placing digital advertising commit to exchange best practices and strengthen cooperation with relevant players, expanding to organisations active in the online monetisation value chain, such as online e-payment services, e-commerce platforms and relevant crowd-funding/donation systems, with the aim to increase the effectiveness of scrutiny of ad placements on their own services.	Measure 3.1 Measure 3.2 Measure 3.3	
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): WHAT TO FIX documents and investigates platforms' monetization practices, including their monetization governance and the enforcement of their monetization terms and policies. As a civil society organisation, we bring independent oversight, as well as recommendations for process and policy improvements, to the application of the Code's commitments around scrutiny of ad placements.		

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 <i>[Delete those that do not apply]</i>		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”.		
<u>Commitment 5</u> Relevant Signatories commit to apply a consistent approach across political and issue advertising on their services and to clearly indicate in their advertising policies the extent to which such advertising is permitted or prohibited on their services		
<u>Commitment 6</u> 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		
<u>Commitment 7</u> 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.		
<u>Commitment 8</u> Relevant Signatories commit to provide transparency information to users about the political or issue ads they see on their service.		

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<u>Commitment 9</u> Relevant Signatories commit to provide users with clear, comprehensible, comprehensive information about why they are seeing a political or issue ad.		
<u>Commitment 10</u> 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.		
<u>Commitment 11</u> 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.		
<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 12.2	
<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): WHAT TO FIX documents and investigates platforms' monetization practices, including the interconnection between their advertising and monetization systems. As a civil society organisation, we provide independent oversight, as well as recommendations for process and policy improvements to the application of the Code's commitments around political advertising.		

IV. Integrity of Services		
List of adopted commitments and measures ⁵ <i>[Delete those that do not apply]</i>		Qualitative Reporting Elements and/or Service Level Indicators ⁶
<u>Commitment 14</u> 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 practises, 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 creation and use of fake accounts, account takeovers and bot-driven amplification, - Hack-and-leak operations, - Impersonation, - Malicious deep fakes, - The purchase of fake engagements, - Non-transparent paid messages or promotion by influencers, - The creation and use of accounts that participate in coordinated inauthentic behaviour, - User conduct aimed at artificially amplifying the reach or perceived public support for disinformation.	Measure 14.3	

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<u>Commitment 15</u> Relevant Signatories that develop or operate AI systems and that disseminate AI-generated and manipulated content through their services (e.g. deepfakes) commit to take into consideration the transparency obligations and the list of manipulative practices prohibited under the Artificial Intelligence Act.		
<u>Commitment 16</u> 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.		
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): As a civil society organisation, WHAT TO FIX aims to contribute to the development of common baseline elements, objectives, and benchmarks for the policies and measures deployed to counter manipulative behaviours and practices.		

V. Empowering Users

List of adopted commitments and measures⁷ <i>[Delete those that do not apply]</i>	Qualitative Reporting Elements and/or Service Level Indicators⁸
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<u>Commitment 17</u> In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, Relevant Signatories commit to continue and strengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups.	Measure 17.1	
<u>Commitment 18</u> Relevant Signatories commit to minimise the risks of viral propagation of misinformation or disinformation by adopting safe design practices as they develop their systems, policies, and features.		
<u>Commitment 19</u> 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.		
<u>Commitment 20</u> Relevant Signatories commit to empower users with tools to assess the provenance and edit history or authenticity or accuracy of digital content.		
<u>Commitment 21</u> 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.		
<u>Commitment 22</u> 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.		
<u>Commitment 23</u> 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.		
<u>Commitment 24</u> 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.		
<u>Commitment 25</u> 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.		
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): As a civil society organization, WHAT TO FIX offers tools and resources (including monetization.wtf, the Meta Monetization Archive and various mapping and investigative studies) that can be used by users to access additional context regarding the incentives behind disinformation content. We also contribute research and recommendations on how platforms could further empower users by strengthening their own transparency practices.		

VI. Empowering the Research Community

List of adopted commitments and measures ⁹		Qualitative Reporting Elements and/or Service Level Indicators ¹⁰
<i>[Delete those that do not apply]</i>		
<u>Commitment 26</u> 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.		
<u>Commitment 27</u> 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.		
<u>Commitment 28</u> Relevant Signatories commit to support good faith research into Disinformation that involve their services.		
<u>Commitment 29</u>		

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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.		
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): WHAT TO FIX empowers the research community by providing unique tools and resources to research monetization and by offering training and mentoring support.		

VII. Empowering the Fact-Checking Community

List of adopted commitments and measures ¹¹		Qualitative Reporting Elements and/or Service Level Indicators ¹²
<i>[Delete those that do not apply]</i>		
<u>Commitment 30</u> 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.		
<u>Commitment 31</u>		

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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.		
<u>Commitment 32</u> 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.		
<u>Commitment 33</u> Relevant Signatories (i.e. fact-checking organisations) commit to operate on the basis of strict ethical and transparency rules, and to protect their independence.		
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): WHAT TO FIX empowers the fact checking community by providing unique tools and resources to research monetization and by offering training and mentoring support.		

VIII. Transparency Centre

List of adopted commitments and measures ¹³ <i>[Delete those that do not apply]</i>		Qualitative Reporting Elements and/or Service Level Indicators ¹⁴
<u>Commitment 34</u> 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.		
<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 36.2	
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): WHAT TO FIX is committed to contribute its findings to the code of conduct transparency center.		

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IX. Permanent Task-force

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): WHAT TO FIX is committed to contributing its expertise to the ongoing work of the Permanent Task Force		

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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 39</u> 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.		
<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	Measure 41.1 Measure 41.2	

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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.		
<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): As a civil society organization, WHAT TO FIX is committed to contributing its expertise to supporting the development of meaningful and measurable progress indicators as well as to support their ongoing monitoring.		

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

Date and place:



Paris, 16/06/2026

Victoire Rio

Executive Director, WHAT TO FIX