

EU CODE OF PRACTICE ON DISINFORMATION 2022

Subscription Document for Google Ireland Limited (“Google”)

This document supersedes and replaces in full the Subscription Document provided by Google in 2022.

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Subscription Document

Name of the Signatory

Google Ireland Limited (“Google”)

About the Signatory

[Provide a description of the Company/Organisation and the relevant products, activities and services it and its subsidiaries offer, which are covered by the listed commitments and measures.]

Describe also the nature and specificities of each of the Company’s/Organisation’s relevant products, activities and services and the types of disinformation-related issues observed on the service.]

A description of the products, activities and services relevant to this Code is included below.

Service name	Description of the service
Google advertising	<p>Google offers services for advertisers and publishers, who we help generate revenue through the display of ads. When subscribing to commitments and measures as “Google advertising” in the present Code, we refer to ads bought through Google Ads or served through AdSense, depending on whether they are pertinent to the commitment or measure in question.</p> <p>To achieve our goals of providing credible and useful information to our users, we need to support a healthy digital advertising ecosystem—one that is trustworthy and transparent, and works for</p>

	<p>users, advertisers, and publishers. To that end, we have policies governing the use of our ads services. These policies are designed not only to abide by laws but to ensure a safe and positive experience for our users. This means that our policies prohibit content that we believe to be harmful to users and the overall advertising ecosystem. Our Publisher policies aim to strike a particularly delicate balance - providing room for publishers to engage, report on and express controversial topics and opinions, while ensuring that we are preventing user harm and instilling trust in our advertiser partners that their ads are running against appropriate content.</p> <p>We take compliance with our policies very seriously and take action against violative ads & sites under our policies. Several of our ads policies are directly applicable to disinformation. These include policies against unreliable claims, hate, and harassment or dangerous content.</p>
Search	<p>Our mission is to organize the world's information and make it universally accessible and useful. Every time a search is made, there are thousands, sometimes millions, of webpages or other content that might be a match. Google uses its robust systems to present the most helpful information in response to a query.</p> <p>Most of our Search index is built through the work of software known as crawlers. These automatically visit publicly accessible webpages and follow links on those pages, much like you would if you were browsing content on the web. They go from page to page and store information</p>

about what they find on these pages and other publicly-accessible content in Google's Search index.

When crawlers find a webpage, our systems render the content of the page, just as a browser does. We take note of key signals — from keywords to website freshness — and we keep track of it all in the Search index.

The Google Search index contains hundreds of billions of webpages and is well over 100,000,000 gigabytes in size. It's like the index in the back of a book — with an entry for every word seen on every webpage we index. When we index a webpage, we add it to the entries for all of the words it contains.

With the vast amount of information available, finding what you need would be nearly impossible without some help sorting through it. Google's ranking systems are designed to do just that: sort through hundreds of billions of webpages and other content in our Search index to present the most relevant, useful results in a fraction of a second.

To give you the most useful information, Search algorithms look at many factors and signals, including the words of your query, relevance and usability of pages, expertise of sources, and your location and settings. The weight applied to each factor varies depending on the nature of your query. For example, the freshness of the content plays a bigger role in answering queries about current news topics than it does about dictionary definitions. More on ranking is available [here](#).

	<p>Search engines generally lack a direct, contractual relationship with content creators. Often, the only information Google possesses about a given website is what is available to anyone with a web browser. Therefore, Google Search often cannot report metrics on account-level enforcement. Instead of relying, first and foremost, on removing individual pieces of content, Google Search’s primary tool to counter low-authoritative content on our service is to promote authoritative information.</p> <p>Given how Google Search encompasses trillions of web pages, images, videos and other content, the results might occasionally contain material that some find objectionable, offensive, or problematic. We’ve carefully developed the content policies for Google Search to balance the real concerns about such issues, alongside the need for a search engine to provide access to information. Our article, Maximize access to information, explains more about this approach.</p> <p>More detailed information on our efforts to deliver the most relevant and reliable information is available on our “How Google Search works” webpage.</p>
YouTube	<p>YouTube is an open video platform where anyone can upload a video and share it with the world. With this openness come incredible opportunities, as well as challenges – which is why we're always working to balance creative expression with our responsibility to protect the community from harmful content. At the heart of our approach are the four Rs: we Remove content that violates our policies</p>

as quickly as possible, Reduce the spread of harmful misinformation and content that brushes up against our policy lines, Raise up authoritative sources when people are looking for news and information and Reward trusted, eligible creators and artists.

Our commitment to responsibility starts with our [Community Guidelines](#). These policies are designed to ensure that our community stays protected. They set out what's allowed and not allowed on YouTube, and apply to all types of content on our platform, including videos, comments, links and thumbnails. Certain types of misleading or deceptive content with serious risk of egregious harm are not allowed on YouTube. This includes certain types of misinformation that can cause real-world harm.

Each of our policies is developed in partnership with a wide range of external industry and policy experts, as well as YouTube creators, and we systematically review our policies to make sure that they remain current. We remove content that violates our policies as quickly as possible, using a combination of people and machine learning to detect potentially problematic content on a massive scale. In addition, we rely on the YouTube community as well as experts in our Priority Flagger programme to help us spot potentially problematic content by reporting it directly to us. We also go to great lengths to make sure that content that violates our policies isn't widely viewed, or even viewed at all, before it's removed. Our automated flagging systems help us detect and review content even before it's seen by our community.

Once such content is identified, human content reviewers evaluate whether it violates our policies. If it does, we remove the content and use it to train our machines for better coverage in the future. Our content reviewers also protect content that has a clear educational, documentary, scientific or artistic [EDSA] purpose.

Information about our policy enforcement can be found in our [Community Guidelines Enforcement Report](#) which we publish on a quarterly basis. More information about YouTube as a platform is available at [How YouTube Works](#).

Disclaimers:

- The descriptions of the Services above apply only for the purposes of the present Code, and are without prejudice to the scoping of Google's designated Very Large Online Platforms (VLOPs) and Very Large Online Search Engine (VLOSE) under the DSA.
- Where Search and YouTube subscribe to Commitments and Measures this refers only to organic content available on those services.
- Signature does not constitute agreement that all Services provided by a Signatory, which may be categorized as VLOPs or VLOSEs under the DSA, are in scope of the Code.

II. Scrutiny of Ad Placements

<u>List of commitments and measures</u>	<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]	
<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>Measure 1.1</u>	N/A	Whereas Google advertising remains overall committed to Commitment 1, this measure is not “relevant, pertinent and practicable” as it is drafted in a way that could require Google to implement measures that are not reasonable, proportionate and effective mitigations to disinformation risks identified on ads.
	<u>Measure 1.2</u>	N/A	Whereas Google advertising remains overall committed to Commitment 1, this measure is not “relevant, pertinent and practicable” as it is drafted in a way that could require Google to implement measures that are not reasonable, proportionate and effective mitigations to disinformation risks identified on ads.
	<u>Measure 1.3</u>	Google advertising	

	<u>Measure 1.4</u>	N/A	This measure focuses on ad buyers rather than on advertising services; as such it is not relevant to Google advertising.
	<u>Measure 1.5</u>	Google advertising	
	<u>Measure 1.6</u>	Google advertising	
Reasons for <i>not subscribing</i> to Commitment 1 (if applicable):			
<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>Measure 2.1</u>	N/A	Whereas Google remains overall committed to Commitment 2, this measure is not “relevant, pertinent and practicable” as it is drafted in a way that could require Google advertising to implement measures that are not reasonable, proportionate and effective mitigations to disinformation risks identified on ads.
	<u>Measure 2.2</u>	Google advertising	
	<u>Measure 2.3</u>	Google advertising	
	<u>Measure 2.4</u>	Google advertising	
Reasons for <i>not subscribing</i> to Commitment 2 (if applicable):			
<u>Commitment 3</u>	<u>Measure 3.1</u>	Google advertising	

<p>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.</p>	<p><u>Measure 3.2</u></p>	<p>Google advertising</p>	
	<p><u>Measure 3.3</u></p>	<p>Google advertising</p>	
<p>Reasons for <i>not subscribing</i> to Commitment 3 (if applicable):</p>			
<p>Information on future considerations or plans [Optional]: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i></p>			

III. Political Advertising and Issue-based Advertising

<u>List of adopted commitments and measures</u>		<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]
<u>Commitment 4</u>	<u>Measure 4.1</u>	N/A	
Relevant Signatories commit to adopt a common definition of “political and issue advertising”.	<u>Measure 4.2</u>	N/A	
<p>Reasons for not subscribing to Commitment 4 (if applicable): Google has decided to no longer offer political advertising services in the EU. The exit from political advertising services in the EU will be implemented before the application of Regulation (EU) 2024/900 on the transparency and targeting of political advertising. Therefore, this Commitment is no longer “relevant, pertinent and practicable” for Google.</p>			
<u>Commitment 5</u>	<u>Measure 5.1</u>	N/A	
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			
<p>Reasons for not subscribing to Commitment 5 (if applicable): Google has decided to no longer offer political advertising services in the EU. The exit from political advertising services in the EU will be implemented before the application of Regulation (EU) 2024/900 on the transparency and targeting of political advertising. Therefore, this Commitment is no longer “relevant, pertinent and practicable” for Google.</p>			

<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>Measure 6.1</u>	N/A	
	<u>Measure 6.2</u>	N/A	
	<u>Measure 6.3</u>	N/A	
	<u>Measure 6.4</u>	N/A	
	<u>Measure 6.5</u>	N/A	
Reasons for <i>not subscribing to Commitment 6 (if applicable)</i>: Google has decided to no longer offer political advertising services in the EU. The exit from political advertising services in the EU will be implemented before the application of Regulation (EU) 2024/900 on the transparency and targeting of political advertising. Therefore, this Commitment is no longer “relevant, pertinent and practicable” for Google.			
<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>Measure 7.1</u>	N/A	
	<u>Measure 7.2</u>	N/A	
	<u>Measure 7.3</u>	N/A	
	<u>Measure 7.4</u>	N/A	

Reasons for not subscribing to Commitment 7 (if applicable): Google has decided to no longer offer political advertising services in the EU. The exit from political advertising services in the EU will be implemented before the application of Regulation (EU) 2024/900 on the transparency and targeting of political advertising. Therefore, this Commitment is no longer “relevant, pertinent and practicable” for Google.

<u>Commitment 8</u> Relevant Signatories commit to provide transparency information to users about the political or issue ads they see on their service.	<u>Measure 8.1</u>	N/A	
	<u>Measure 8.2</u>	N/A	

Reasons for not subscribing to Commitment 8 (if applicable): Google has decided to no longer offer political advertising services in the EU. The exit from political advertising services in the EU will be implemented before the application of Regulation (EU) 2024/900 on the transparency and targeting of political advertising. Therefore, this Commitment is no longer “relevant, pertinent and practicable” for Google.

<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>Measure 9.1</u>	N/A	
	<u>Measure 9.2</u>	N/A	

Reasons for not subscribing to Commitment 9 (if applicable): Google has decided to no longer offer political advertising services in the EU. The exit from political advertising services in the EU will be implemented before the application of Regulation (EU) 2024/900 on the transparency and targeting of political advertising. Therefore, this Commitment is no longer “relevant, pertinent and practicable” for Google.

<u>Commitment 10</u>	<u>Measure 10.1</u>	N/A	
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<p>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.</p>	<p><u>Measure 10.2</u></p>	<p>N/A</p>	
<p>Reasons for <i>not subscribing to Commitment 10 (if applicable)</i>: Google has decided to no longer offer political advertising services in the EU. The exit from political advertising services in the EU will be implemented before the application of Regulation (EU) 2024/900 on the transparency and targeting of political advertising. Therefore, this Commitment is no longer “relevant, pertinent and practicable” for Google.</p>			
<p><u>Commitment 11</u></p> <p>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.</p>	<p><u>Measure 11.1</u></p>	<p>N/A</p>	
	<p><u>Measure 11.2</u></p>	<p>N/A</p>	
	<p><u>Measure 11.3</u></p>	<p>N/A</p>	
	<p><u>Measure 11.4</u></p>	<p>N/A</p>	
<p>Reasons for <i>not subscribing to Commitment 11 (if applicable)</i>: Google has decided to no longer offer political advertising services in the EU. The exit from political advertising services in the EU will be implemented before the application of Regulation (EU) 2024/900 on the transparency and targeting of political advertising. Therefore, this Commitment is no longer “relevant, pertinent and practicable” for Google.</p>			

<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.	<u>Measure 12.1</u>	N/A	
	<u>Measure 12.2</u>	N/A	
	<u>Measure 12.3</u>	N/A	
Reasons for <i>not subscribing to Commitment 12</i> (if applicable): This commitment is not applicable to Google services - it is aimed at civil society Signatories.			
<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.	<u>Measure 13.1</u>	N/A	
	<u>Measure 13.2</u>	N/A	
	<u>Measure 13.3</u>	N/A	
Reasons for <i>not subscribing to Commitment 13</i> (if applicable): Google has decided to no longer offer political advertising services in the EU. The exit from political advertising services in the EU will be implemented before the application of Regulation (EU) 2024/900 on the transparency and targeting of political advertising. Therefore, this Commitment is no longer “relevant, pertinent and practicable” for Google.			
Information on future considerations or plans: <i>[If applicable, give an indication of which commitments/measures might be under the service’s consideration for signature in the future]</i>			

IV. Integrity of Services

<u>List of adopted commitments and measures</u>	<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]	
<p><u>Commitment 14</u></p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> - The creation and use of fake accounts, account takeovers and bot-driven amplification, - Hack-and-leak operations, - Impersonation, 	<u>Measure 14.1</u>	Search YouTube	Search and YouTube subscribe to this measure under the understanding that it does not require the referenced TTPs to map singularly to policies, and that approximate reporting based on readily available data is acceptable.
	<u>Measure 14.2</u>	Search YouTube	Search and YouTube subscribe to this measure under the understanding that it does not require the referenced TTPs to map singularly to policies, and that approximate reporting based on readily available data is acceptable.
	<u>Measure 14.3</u>	Search YouTube	Search and YouTube subscribe to this measure under the understanding that it does not require the referenced TTPs to map singularly to policies, and that approximate reporting based on readily available data is acceptable.

<ul style="list-style-type: none"> - 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. 			
Reasons for <i>not subscribing</i> to Commitment 14 (if applicable):			
<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 proposal for Artificial Intelligence Act.	<u>Measure 15.1</u>	Search YouTube	
	<u>Measure 15.2</u>	Search YouTube	
Reason for <i>not subscribing</i> to Commitment 15 (if applicable):			
<u>Commitment 16</u>	<u>Measure 16.1</u>	Search YouTube	

<p>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.</p>	<p><u>Measure 16.2</u></p>	<p>YouTube</p>	<p>Search does not operate accounts that could be the target of cross-platform migration; for this reason, this measure is not relevant to Search.</p>
<p>Reason for <i>not subscribing to Commitment 16</i> (if applicable):</p>			
<p>Information on future considerations or plans: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i></p>			

V. Empowering Users

<u>List of adopted commitments and measures</u>		<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]
<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	<u>Measure 17.1</u>	Search YouTube	
	<u>Measure 17.2</u>	Search YouTube	
	<u>Measure 17.3</u>	Search YouTube	
Reasons for <i>not subscribing</i> to Commitment 17 (if applicable):			
<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>Measure 18.1</u>	N/A	This measure is not "relevant, pertinent and practicable" for YouTube and Search, as under Articles 34 and 35 of the Digital Services Act, YouTube and Search annually assess and mitigate in a tailored manner systemic risks related to disinformation, including as regards recommender systems and the design of products, policies, or processes. Additionally, the nature of Search does

			not allow for the viral propagation of content as outlined in this measure.
	<u>Measure 18.2</u>	Search YouTube	
	<u>Measure 18.3</u>	Search YouTube	
Reasons for <i>not subscribing to Commitment 18</i> (if applicable):			
<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>Measure 19.1</u>	Search YouTube	
	<u>Measure 19.2</u>	Search YouTube	
Reason for <i>not subscribing to Commitment 19</i> (if applicable):			
<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>Measure 20.1</u>	N/A	
	<u>Measure 20.2</u>	N/A	
Reason for <i>not subscribing to Commitment 20</i> (if applicable):			

The Commission’s [2021 Guidance](#) notes this is an issue the Code’s Signatories “could” explore; and the negotiations of the updated Code of Practice established that this is a direction Relevant Signatories are encouraged but not expected to sign up to. As such we will continue to consider whether and which provenance tools and procedures are pertinent to our services over time and may update this subscription document accordingly in the future.

<p><u>Commitment 21</u></p> <p>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</p>	<p><u>Measure 21.1</u></p>	N/A	
	<p><u>Measure 21.2</u></p>	N/A	
	<p><u>Measure 21.3</u></p>	N/A	
<p>Reason for <i>not subscribing to Commitment 21</i> (if applicable): This commitment is not “relevant, pertinent and practicable” for Search or YouTube. Search and YouTube make available other methods for users to assess the factual accuracy of online information.</p>			
<p><u>Commitment 22</u></p> <p>Relevant Signatories commit to provide users with tools to help them make more informed decisions when they encounter online information that may be</p>	<p><u>Measure 22.1</u></p>	N/A	
	<p><u>Measure 22.2</u></p>	N/A	

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>Measure 22.3</u>	N/A	
	<u>Measure 22.4</u>	N/A	
	<u>Measure 22.5</u>	N/A	
	<u>Measure 22.6</u>	N/A	
	<u>Measure 22.7</u>	Search YouTube	
<p>Reason for <i>not subscribing to Commitment 22</i> (if applicable): The Commission’s 2021 Guidance notes this is an issue the Code’s Signatories “could” explore; and the negotiations of the updated Code of Practice, established that this is a direction Relevant Signatories are encouraged but not expected to sign up to. As such we will continue to consider whether and which trustworthiness indicators and tools are pertinent to our services and update this subscription document accordingly over time.</p>			
<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>Measure 23.1</u>	Search YouTube	
	<u>Measure 23.2</u>	Search YouTube	
<p>Reason for <i>not subscribing to Commitment 23</i> (if applicable):</p>			

<p><u>Commitment 24</u></p> <p>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</p>	<p><u>Measure 24.1</u></p>	<p>YouTube</p>	<p>This measure is not relevant to Search (e.g. website operators do not need to have a Google account to be indexed in Search; their content lives on their websites; and most do not have a contractual relationship with Search).</p>
<p>Reason for <i>not subscribing to Commitment 24</i> (if applicable):</p>			
<p><u>Commitment 25</u></p> <p>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</p>	<p><u>Measure 25.1</u></p>	<p>N/A</p>	
	<p><u>Measure 25.2</u></p>	<p>N/A</p>	
<p>Reason for <i>not subscribing to Commitment 25</i> (if applicable): This commitment is not applicable for Google's services in scope of the Code.</p>			

Information on future considerations or plans:

[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]

VI. Empowering the Research Community

<u>List of adopted commitments and measures</u>		<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]
<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>Measure 26.1</u>	Search YouTube	
	<u>Measure 26.2</u>	YouTube	This measure refers to user-generated content platforms that include “accounts” for users (such as public figures) to post content for public consumption. Search does not have such functionalities and, therefore, this measure is not relevant.
	<u>Measure 26.3</u>	Search YouTube	
Reasons for <i>not subscribing</i> to Commitment 26 (if applicable):			
<u>Commitment 27</u> Relevant Signatories commit to provide vetted researchers with access to data necessary to	<u>Measure 27.1</u>	N/A	
	<u>Measure 27.2</u>	N/A	

undertake research on Disinformation by developing, funding, and cooperating with an independent, third-party body that can vet researchers and research proposals	<u>Measure 27.3</u>	N/A	
	<u>Measure 27.4</u>	N/A	
Reason for <i>not subscribing to Commitment 27</i> (if applicable): Google is concerned that this commitment conflicts with Article 40 of the Digital Services Act. Google understands that this issue will be covered by the delegated act on researcher data access under Article 40 of the Digital Services Act.			
<u>Commitment 28</u> Relevant Signatories commit to support good faith research into Disinformation that involve their services	<u>Measure 28.1</u>	Search YouTube	
	<u>Measure 28.2</u>	Search YouTube	
	<u>Measure 28.3</u>	Search YouTube	
	<u>Measure 28.4</u>	Search YouTube	
Reason for <i>not subscribing to Commitment 28</i> (if applicable):			
<u>Commitment 29</u> Relevant Signatories commit to conduct research based on transparent methodology and ethical	<u>Measure 29.1</u>	N/A	
	<u>Measure 29.2</u>	N/A	

standards, as well as to share datasets, research findings and methodologies with relevant audiences	<u>Measure 29.3</u>	N/A	
<p>Reason for <i>not subscribing to Commitment 29</i> (if applicable):</p> <p>This commitment is not applicable to Google's services. It is aimed at the research community.</p>			
<p>Information on future considerations or plans: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i></p>			

VII. Empowering the Fact-checking Community

<u>List of adopted commitments and measures</u>		<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]
<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>Measure 30.1</u>	N/A	
	<u>Measure 30.2</u>	N/A	
	<u>Measure 30.3</u>	N/A	
	<u>Measure 30.4</u>	N/A	
Reasons for not subscribing to Commitment 30 (if applicable): Complying with this commitment is not a “relevant, pertinent and practicable” method for YouTube and Search to mitigate the systemic risk of disinformation. YouTube and Search have in place reasonable, proportionate and effective measures to mitigate identified systemic disinformation risks on their services. Search and YouTube make available other methods for users to assess the factual accuracy of online information.			
<u>Commitment 31</u>	<u>Measure 31.1</u>	N/A	

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>Measure 31.2</u>	N/A	
	<u>Measure 31.3</u>	N/A	
	<u>Measure 31.4</u>	N/A	
Reason for <i>not subscribing to Commitment 31 (if applicable)</i>: Complying with this commitment is not a “relevant, pertinent and practicable” method for YouTube and Search to mitigate the systemic risk of disinformation. YouTube and Search have in place reasonable, proportionate and effective measures to mitigate identified systemic disinformation risks on their services. Search and YouTube make available other methods for users to assess the factual accuracy of online information.			
<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>Measure 32.1</u>	N/A	
	<u>Measure 32.2</u>	N/A	
	<u>Measure 32.3</u>	N/A	
Reason for <i>not subscribing to Commitment 32 (if applicable)</i>: Complying with this commitment is not a “relevant, pertinent and practicable” method for YouTube and Search to mitigate the systemic risk of disinformation. YouTube and Search have in place reasonable, proportionate and effective measures to mitigate identified systemic disinformation risks on their services. Search and YouTube make available other methods for users to assess the factual accuracy of online information.			
<u>Commitment 33</u> Relevant Signatories (i.e. fact-checking organisations) commit to operate on the basis of strict ethical and	<u>Measure 33.1</u>	N/A	

transparency rules, and to protect their independence.			
Reason for <i>not subscribing to Commitment 33</i> (if applicable): This commitment is not applicable to Google's services as it applies to fact-checking organisations.			
Information on future considerations or plans: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i>			

VIII. Transparency Centre

<p><u>List of adopted commitments and measures</u></p>	<p><u>Subscribed (including indication about which of the signatory's services are subscribed to)</u></p>	<p>Additional comment including:</p> <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) <p>[Provide these comments for each commitment/measure as relevant]</p>	
<p><u>Commitment 34</u></p> <p>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</p>	<p><u>Measure 34.1</u></p>	<p>Google, on behalf of the services subscribed to the Code</p>	<p>For this chapter, Commitments and Measures affect companies rather than individual services; as such we're subscribing to all Measures in this chapter on behalf of Google's services subscribed to the Code.</p>
	<p><u>Measure 34.2</u></p>	<p>Google, on behalf of the services subscribed to the Code</p>	
	<p><u>Measure 34.3</u></p>	<p>Google, on behalf of the services subscribed to the Code</p>	
	<p><u>Measure 34.4</u></p>	<p>Google, on behalf of the services subscribed to the Code</p>	

	<u>Measure 34.5</u>	Google, on behalf of the services subscribed to the Code	
Reasons for <i>not subscribing</i> to Commitment 34 (if applicable):			
<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.	<u>Measure 35.1</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 35.2</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 35.3</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 35.4</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 35.5</u>	Google, on behalf of the services subscribed to the Code	

	<u>Measure 35.6</u>	Google, on behalf of the services subscribed to the Code	
Reason for <i>not subscribing to Commitment 35</i> (if applicable):			
<u>Commitment 36</u> Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner	<u>Measure 36.1</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 36.2</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 36.3</u>	Google, on behalf of the services subscribed to the Code	
Reason for <i>not subscribing to Commitment 36</i> (if applicable):			
Information on future considerations or plans: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i>			

IX. Task-force

<u>List of adopted commitments and measures</u>	<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service) [Provide these comments for each commitment/measure as relevant]	
<p><u>Commitment 37</u></p> <p>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.</p>	<p><u>Measure 37.1</u></p>	<p>Google, on behalf of the services subscribed to the Code</p>	<p>For this chapter, Commitments and Measures affect companies rather than individual services; as such we're subscribing to all Measures in this chapter on behalf of Google's services subscribed to the Code.</p>
	<p><u>Measure 37.2</u></p>	<p>Google, on behalf of the services subscribed to the Code</p>	
	<p><u>Measure 37.3</u></p>	<p>Google, on behalf of the services subscribed to the Code</p>	
	<p><u>Measure 37.4</u></p>	<p>Google, on behalf of the services subscribed to the Code</p>	

	<u>Measure 37.5</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 37.6</u>	Google, on behalf of the services subscribed to the Code	
Reasons for <i>not subscribing</i> to Commitment 37 (if applicable):			
Information on future considerations or plans: <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i>			

X. Monitoring Framework		
<u>List of adopted commitments and measures</u>	<u>Subscribed (including indication about which of the signatory's services are subscribed to)</u>	Additional comment including: <ul style="list-style-type: none"> • <u>Reason for not subscribing (at the service level), including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service)</u> [Provide these comments for each commitment/measure as relevant]

<p><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.</p>	<p>Google, on behalf of the services subscribed to the Code.</p> <p>* For this chapter, Commitments and Measures affect companies rather than individual services; as such we're subscribing to all Measures in this chapter on behalf of Google's services subscribed to the Code.</p>		
<p>Reasons for <i>not subscribing</i> to Commitment 38 (if applicable):</p>			
<p><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.</p>	<p>Google, on behalf of the services subscribed to the Code.</p>		
<p>Reasons for <i>not subscribing</i> to Commitment 39 (if applicable):</p>			
<p><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.</p>	<p><u>Measure 40.1</u></p>	<p>Google, on behalf of the services subscribed to the Code</p>	
	<p><u>Measure 40.2</u></p>	<p>Google, on behalf of the services subscribed</p>	

		d to the Code	
	<u>Measure 40.3</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 40.4</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 40.5</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 40.6</u>	Google, on behalf of the services subscribe	

		d to the Code	
Reason for <i>not subscribing to Commitment 40</i> (if applicable):			
<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 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>Measure 41.1</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 41.2</u>	Google, on behalf of the services subscribed to the Code	
	<u>Measure 41.3</u>	Google, on behalf of the services subscribed to the Code	
Reason for <i>not subscribing to Commitment 41</i> (if applicable):			
<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	Google, on behalf of the services subscribed to the Code		

Reason for *not subscribing to Commitment 42* (if applicable):

Commitment 43

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

Google, on behalf of the services subscribed to the Code

Reason for *not subscribing to Commitment 43* (if applicable):

DocuSigned by:



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Liz Cunningham (Director)

on behalf of Google Ireland Limited

15 January 2025