

EU CODE OF PRACTICE ON DISINFORMATION 2022

# Subscription Document for Microsoft Advertising

**Name of the Signatory**

Microsoft Advertising

**About the Signatory**

Microsoft Advertising is a proprietary advertising platform which works both with advertisers, who provide it with advertising content, and publishers, who display these advertisements on their services. Microsoft Advertising employs a distinct set of policies and enforcement measures with respect to each of these two categories of business partners to prevent the spread of disinformation through advertising. In light of the conversion of the Disinformation Code of Practice into a DSA Code of Conduct, Microsoft Advertising, not being designated as a Very Large Online Platform or Search Engine (VLOPSE) for the purposes of the DSA, is subscribing to the Code of Practice as a distinct service, using the simplified subscription document for signatories that are not a VLOPSE, demonstrating Microsoft Advertising's commitment to discourage and reduce the dissemination and monetization of disinformation through advertising.

This subscription document governs the participation of Microsoft Advertising in the Code effective as of the signature date hereof. It supersedes and replaces in full all commitments made by or on behalf of Microsoft Advertising in Microsoft's subscription document dated 14 June 2022.

Service name	Description of the service
<i>Microsoft Advertising</i>	<i>Online advertising platform</i>

<b>II. Scrutiny of Ad Placement</b>		
<b>List of adopted commitments and measures <sup>1</sup></b>		<b>Qualitative reporting elements and service level indicators<sup>2</sup></b>
<b><u>Commitment 1</u></b>	<b><u>Measure 1.1</u></b>	<b><u>QRE 1.1.1; SLI 1.1.1</u></b>
	<b><u>Measure 1.2</u></b>	<b><u>QRE 1.2.1</u></b>
	<b><u>Measure 1.3</u></b>	<b><u>QRE 1.3.1</u></b>
	<b><u>Measure 1.6</u></b>	<b><u>QRE 1.6.1</u></b>
<b><u>Commitment 2</u></b>	<b><u>Measure 2.1</u></b>	<b><u>QRE 2.1.1</u></b>
	<b><u>Measure 2.2</u></b>	<b><u>QRE 2.2.1</u></b>
	<b><u>Measure 2.3</u></b>	<b><u>QRE 2.3.1</u></b>
	<b><u>Measure 2.4</u></b>	<b><u>QRE 2.4.1</u></b>
<b><u>Commitment 5</u></b>	<b><u>Measure 5.1</u></b>	<b><u>QRE 5.1.1</u></b>
<b><u>Commitment 7</u></b>	<b><u>Measure 7.3</u></b>	<b><u>QRE 7.3.2</u></b>
<b>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)</b>		

<sup>1</sup> Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

<sup>2</sup> Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate

Microsoft Advertising has signed up to those Commitments and Measures that directly further its long-standing objectives to uphold the spirit and applicable requirements of the Code, balancing meaningful participation and tailoring its approach to its business model and operations.

As a change from its previous subscription, for reasons of relevance, pertinence and practicability Microsoft Advertising has chosen not to formally sign up to the following:

- SLI 1.1.2: The SLI is not applicable because the prescribed factors do not reflect the corresponding business metrics. Specifically, the conversion factor is in CPM (cost per thousand impressions), whereas Microsoft Advertising utilizes a CPC (cost per click) model. Furthermore, Microsoft Advertising's approach is to prevent any monetization before it occurs, making the monetary calculation not relevant, pertinent, or practical.
- Measure 1.5: Microsoft Advertising's current accreditations, policies, and processes sufficiently cover all necessary aspects of our operations relating to meeting the obligations of the Code. This makes a separate accreditation or certification for the same functions not relevant, pertinent, or practical.
- Commitment 3: Microsoft Advertising believes that their existing efforts—both within and outside the Code framework—already align with the spirit of cooperation. While not formally committed to Commitment 3, Microsoft Advertising remains steadfast in its dedication to maintaining industry standards and actively collaborating to combat disinformation.

Furthermore, Microsoft Advertising only subscribes to Measure 5.1 (QRE 5.1.1) and Measure 7.3 (QRE 3.7.2) of the political advertising commitments. This decision aligns with its publicly available policies, which explicitly state that political advertising is not allowed on our platform.

<b>VIII. Transparency Centre</b>		
<b>List of adopted commitments and measures <sup>3</sup></b>		<b>Qualitative reporting elements and service level indicators<sup>4</sup></b>
<b><u>Commitment 34</u></b>	<b><u>Measure 34.3</u></b>	
<b><u>Commitment 35</u></b>	<b><u>Measure 35.1</u></b>	
	<b><u>Measure 35.2</u></b>	
	<b><u>Measure 35.3</u></b>	
<p><b>Provide reasoning for the choice of commitments and measures, as well as future plans</b> (if applicable)</p> <p>Microsoft Advertising will continue contributing to the Transparency Center, to the extent applicable and commensurate to its services and subscriptions, in collaboration with other Signatories.</p>		

<sup>3</sup> Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

<sup>4</sup> Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate

<b>IX. Permanent Task-force</b>		
<b>List of adopted commitments and measures <sup>5</sup></b>		<b>Qualitative reporting elements and service level indicators<sup>6</sup></b>
<b><u>Commitment 37</u></b>	<b><u>Measure 37.1</u></b>	
	<b><u>Measure 37.4</u></b>	
	<b><u>Measure 37.5</u></b>	
	<b><u>Measure 37.6</u></b>	
<p><b>Provide reasoning for the choice of commitments and measures, as well as future plans</b> (if applicable)</p> <p>Microsoft Advertising will continue contributing to the listed measures, to the extent applicable and commensurate to its services and subscriptions, in collaboration with other Signatories.</p>		

<sup>5</sup> Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

<sup>6</sup> Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

<b>X. Monitoring of the Code</b>		
<b>List of adopted commitments and measures <sup>7</sup></b>		<b>Qualitative reporting elements and service level indicators<sup>8</sup></b>
<b><u>Commitment 40</u></b>	<b><u>Measure 40.2</u></b>	
	<b><u>Measure 40.3</u></b>	
<b><u>Commitment 43</u></b>		
<p><b>Provide reasoning for the choice of commitments and measures, as well as future plans</b> (if applicable)</p> <p>Microsoft Advertising will continue contributing to the listed measures, to the extent applicable and commensurate to its services and subscriptions, in collaboration with other Signatories</p>		

**Signature:** James O'Connor  
[James O'Connor \(Jan 13, 2025 15:22 GMT\)](#)  
 James O'Connor  
 Director  
 Microsoft Ireland Operations Limited

**Date and place:** 13 January 2025, Dublin, Ireland

<sup>7</sup> Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

<sup>8</sup> Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate