

EU CODE OF PRACTICE ON DISINFORMATION 2022

Subscription Document for Signatory Adobe

Name of the Signatory

Adobe, Inc. ("Adobe")

About the Signatory

Adobe is the global leader in digital marketing and digital media solutions. Since the company's foundation in December 1982, we have pushed the boundaries of creativity with products and services that allow our customers to create, deploy, and enhance digital content. Europe is our second largest market outside of the United States, where we are helping some of the largest European companies to deliver digital transformation strategies in fast-paced and highly complex economies. Our creative tools are used by millions of European creators to tell their digital story.

In the online environment, we act as a digital service provider, connecting companies, creators and customers in their digital media and digital experiences. Our services are comprised of cloud-based solutions allowing for seamless interactions between core online tools for businesses, including their marketing, analytics, and advertising. Our cloud-based solutions are divided into these categories:

- [Adobe Creative Cloud](#): An entire collection of software used for graphic design, video editing, web development, and photography. It includes everything customers need to create, collaborate, and get inspired. It includes some of our most popular products such Photoshop, Illustrator, Lightroom, Premier Pro, and Adobe Express.
- [Adobe Document Cloud](#): A complete portfolio of secure digital document solutions that speeds business and drives better customer experiences by making manual, paper-based processes 100% digital. The most prominent products include Acrobat, Reader, Scan, and Sign.
- [Adobe Experience Cloud](#): A collection of applications, services, and a platform designed to manage customer journeys, enable shoppable experiences, and deliver intelligence for businesses of any size in any industry.
- [Publishing and Advertising](#): This segment covers legacy products and services including eLearning solutions, technical document publishing, web conferencing software, document and forms platform, web application development, high-end printing, and an end-to-end platform for managing advertising across digital formats and simplifying the delivery of advertising across channels and screens.

For the purposes of the Code, from the categories set out above, we assess that some aspects of our Advertising Cloud business in our Publishing and Advertising category are in scope.

Why Adobe cares about disinformation:

With the increasing volume and velocity of digital content creation, it is critical to ensure transparency, understanding, and ultimately, trust in what we are consuming online, while empowering consumers. The Code of Practice on Disinformation is an important step in the fight to tackle disinformation. However, the solutions to disinformation can and should go beyond increasing transparency of ads and detecting and removing fake accounts and instead focus on the longer-term solutions of verifying trustworthy content.

It is possible, despite reasonable prevention efforts, that an outside party (customer or otherwise) might make use of Adobe's technology, such as with our video and photo tools provided in Adobe Creative Cloud, in a way that results in questioning the authenticity of content. Adobe feels a responsibility to support the creative community, and society at large, and is committing to contributing to solutions that address the issues of manipulated media.

As such, **content provenance** is a major focus for Adobe and the work we lead on the [Content Authenticity Initiative](#) (CAI), along with other Code of Practice signatories Twitter, Microsoft and others. We are focused on cross-industry participation, with an open, extensible approach for providing media transparency to allow for better evaluation of content. **The CAI does not prescribe a unified single platform for authenticity, but instead advocates a set of open standards** that can be used to create and reveal provenance for images, documents, time-based media (video, audio) and streaming content.

Provenance, sometimes referred to as attribution, empowers content creators and editors, regardless of their geographic location or degree of access to technology, to voluntarily disclose information about who created or changed an asset, what was changed and how it was changed.

Provenance tools will help establish ownership for creators, foster transparency within digital media and bolster trust in content (images, video, other digital formats) by adding robust, tamper-evident provenance data about how a piece of content was produced, edited, and published. Adobe's goal with the CAI is to add a layer of secure provenance which expresses relevant facts about how content is altered from the moment of creation to the moment of audience experience. This technique will eliminate much of the uncertainty currently facing editors and authors of creative content and provide greater transparency into the origins of online media for consumers. A CAI solution would therefore be of great use to content creators, content publishers and content consumers.

In February 2021, Adobe, Arm, BBC, Intel, Microsoft, and Truepic launched a formal coalition for standards development: The Coalition for Content Provenance and Authenticity ([C2PA](#)). It is a mutually governed consortium created to accelerate the pursuit of pragmatic, adoptable standards for digital provenance, serving creators, editors, publishers, media platforms, and consumers. In January 2022, the C2PA publicly released of the open technical specification for digital provenance, which provides platforms with a blueprint to define what information is associated with each type of asset (e.g., images, videos, audio, or documents), how that information is presented and stored, and how evidence of tampering can be identified. This work will continue to evolve and address the latest trends and landscape needs. As standards specification work is taken up by the C2PA, the CAI continues its mission to foster a broad and diverse community of stakeholders through three areas of focus: education and advocacy, prototype implementations in real-world contexts at scale, and developing an engaged community of implementors and users of this technology.

We see Adobe’s work on content provenance being particularly relevant to the revised Code of Conduct on empowering users chapter and we look forward to being Signatories of commitments relating to this work and supporting and encouraging other signatories to subscribe to these commitments.

Service name	Description of the service
Advertising Cloud	an end-to-end platform for managing advertising across digital formats and simplifying the delivery of advertising across channels and screens.

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Supporting document: Tables for simplified subscription documents

II. Scrutiny of Ad Placements		
List of adopted commitments and measures ¹		Qualitative reporting elements and service level indicators ²
<u>Commitment 1</u>	<u>Measure 1.1</u>	<u>QRE 1.1.1</u> <u>SLI 1.1.1</u>
	<u>Measure 1.2</u>	<u>QRE 1.2.1</u> <u>SLI 1.2.1</u>
	<u>Measure 1.3</u>	<u>QRE 1.3.1</u>
	<u>Measure 1.6</u>	<u>QRE 1.6.1</u>
<u>Commitment 2</u>	<u>Measure 2.1</u>	<u>QRE 2.1.1</u> <u>SLI 2.1.1</u>
	<u>Measure 2.2</u>	<u>QRE 2.2.1</u>
	<u>Measure 2.3</u>	<u>QRE 2.3.1</u> <u>SLI 2.3.1</u>
	<u>Measure 2.4</u>	<u>QRE 2.4.1</u>

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

² 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

		<u>SLI 2.4.1</u>
<u>Commitment 3</u>	<u>Measure 3.1</u>	<u>QRE 3.1.1</u>
	<u>Measure 3.2</u>	<u>QRE 3.2.1</u>
	<u>Measure 3.3</u>	<u>QRE 3.3.1</u>
<p>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)</p> <p><i>Adobe Advertising Cloud has: (1) an external policy regarding ad content and targeting directed at our customers (the advertisers who purchase ads), and (2) existing internal processes to evaluate and manage both supply websites and apps from Adobe’s partner seller relationships, as well as the ad creatives and landing pages from our advertising customers. These processes are based on industry brand safety requirements which do not include disinformation or fact-checking elements. However, these processes will be amended.</i></p>		

III. Political Advertising	
List of adopted commitments and measures ³	Qualitative reporting elements and service level indicators⁴
<p>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)</p> <p><i>Adobe has prohibited the running of political advertising through the Advertising Cloud business since September 2020 and therefore this chapter is not relevant to our business.</i></p> <p><i>We will watch with interest the Commitment by Signatories to adopt a common definition of political and issue advertising (Commitment 4) and as per Preamble (g) will review these commitments and measures in the future to assess if they are of relevance to our business and consider if future adoption would be appropriate.</i></p>	

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

⁴ 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

V. Empowering Users		
List of adopted commitments and measures ⁵		Qualitative reporting elements and service level indicators⁶
<u>Commitment 20</u>	<u>Measure 20.1</u>	<u>QRE 20.1.1</u>
	<u>Measure 20.2</u>	<u>QRE 20.2.1</u>
<p>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)</p> <p><i>Adobe recognises the importance of the potential of digital content provenance technology to empower users to determine for themselves the veracity of the content they are consuming online which is why we founded the Content Authenticity Initiative and are members of the Coalition for Content Provenance and Authenticity .</i></p> <p><i>As per Preamble (g) we will review the commitments and measures in this Chapter in future to assess if they are of relevance to our business and activities and consider if future adoption would be appropriate, in particular, on enhancing media literacy.</i></p>		

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

⁶ 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

VIII. Transparency Centre		
List of adopted commitments and measures ⁷		Qualitative reporting elements and service level indicators⁸
<u>Commitment 34</u>	<u>Measure 34.1</u>	
	<u>Measure 34.2</u>	
	<u>Measure 34.3</u>	
	<u>Measure 34.4</u>	
	<u>Measure 34.5</u>	
<u>Commitment 35</u>	<u>Measure 35.1</u>	
	<u>Measure 35.3</u>	
	<u>Measure 35.5</u>	

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

⁸ 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

	<u>Measure 35.6</u>	
<u>Commitment 36</u>	<u>Measure 36.1</u>	
	<u>Measure 36.2</u>	
<p>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)</p> <p><i>We support the establishment of the Transparency Centre. Our level of commitment to these measures is commensurate with the proportion of the code which applies to our business and our risk profile.</i></p> <p><i>As per as per Preamble (g) will review these commitments and measures in future to assess if they are of relevance to our business and consider if future adoption would be appropriate.</i></p>		

IX. Permanent Task-force		
List of adopted commitments and measures ⁹		Qualitative reporting elements and service level indicators¹⁰
<u>Commitment 37</u>	<u>Measure 37.1</u>	
	<u>Measure 37.2</u>	
	<u>Measure 37.3</u>	
	<u>Measure 37.4</u>	
	<u>Measure 37.5</u>	
	<u>Measure 37.6</u>	<u>QRE 37.6.1</u>
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)		

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

¹⁰ 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

We support the establishment of the Permanent Taskforce. Our level of commitment to these measures is commensurate with the proportion of the code which applies to our business and our risk profile.

As per as per Preamble (g) will review these commitments and measures in future to assess if they are of relevance to our business and consider if future adoption would be appropriate.

X. Monitoring of the Code		
List of adopted commitments and measures ¹¹		Qualitative reporting elements and service level indicators ¹²
<u>Commitment 38</u>	<u>Measure 38.1</u>	
<u>Commitment 39</u>		
<u>Commitment 40</u>	<u>Measure 40.2</u>	
	<u>Measure 40.3</u>	
	<u>Measure 40.4</u>	
	<u>Measure 40.5</u>	
	<u>Measure 40.6</u>	

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

¹² 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

<u>Commitment 43</u>		

Signature

Date and place

Jace Johnson, Vice President Government Affairs and Public Policy, Adobe

14 June 2022, Washington D.C