

EU CODE OF PRACTICE ON DISINFORMATION 2022

## **Subscription Document for Signatory Crisp**

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Subscription Document

**Name of the Signatory**

*Crisp*

**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.]*

*Crisp is the most trusted provider of Platform Risk Intelligence for global Trust & Safety teams. Its AI technology has been trained over 16 years by the company's industry leading online safety experts to identify risk signals embedded within the digital chatter of bad actor groups, so that online platforms can anticipate what they'll do next. Crisp is a founding member of the Online Industry Safety Association and WeProtect Global Alliance, providing vital research to its annual Global Threat Assessment. Crisp contributes to the safe, daily online experiences of over two billion users, including an estimated 450 million children. Crisp customers are always first to know and first to act. Learn more at [crispthinking.com](https://www.crispthinking.com).*

*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 ]*

*Service name    Description of the service*

*PLATFORM RISK INTELLIGENCE    Crisp Artificial Intelligence Technology and online safety experts identify and qualify new and emergent misinformation campaigns and associated risks in over 50 languages*

*Key Focus on*

- Health focused Disinformation*
- Election focused Disinformation*

*- Political (Non-Election) Disinformation*  
*- Enterprise / Corporate Disinformation*

- *Actor, risk and content submissions*
- *Flash Reports for additional details*
- *Platform Intelligence Reports*
- *Strategic Intelligence Reports*
- *Period of Special Interest Reports*
- *24/7/365 customer support*
- *Market-leading technology*
- *Detection of a wide range of online harms*
- *54 languages available*
- *Customizable solution*

Service name	Description of the service
PLATFORM RISK INTELLIGENCE	Crisp Artificial Intelligence Technology and online safety experts identify and qualify new and emergent misinformation campaigns and associated risks in over 50 languages Key Focus on

	<ul style="list-style-type: none"><li>- Health focused Disinformation</li><li>- Election focused Disinformation</li><li>- Political (Non-Election) Disinformation</li><li>- Enterprise / Corporate Disinformation</li></ul>

Disclaimer:

- Signing up to the Commitments and Measures as set out in this document is without prejudice to the VLOP designation of the relevant services.
- Signing up doesn't constitute that all Services provided by a Signatory, which may be categorized as VLOPs under DSA, are in scope of the Code.

<b>II. Scrutiny of Ad Placements</b>		
<u>List of commitments and measures</u>	<u>Subscribed</u>  <u>(including indication about which of the signatory's services are subscribed to)</u>	<b>Additional comment including:</b>  <ul style="list-style-type: none"> <li>• <b><u>Reason for not subscribing (at the service level)</u></b> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service)</li> </ul> [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>	
	<u>Measure 1.2</u>	
	<u>Measure 1.3</u>	
	<u>Measure 1.4</u>	
	<u>Measure 1.5</u>	
	<u>Measure 1.6</u>	
<b>Reasons for <i>not subscribing</i> to Commitment 1 (if applicable):</b>		

<b>Not applicable to current Crisp Services</b>			
<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>		
	<u>Measure 2.2</u>		
	<u>Measure 2.3</u>		
	<u>Measure 2.4</u>		
<b>Reasons for <i>not subscribing to Commitment 2</i> (if applicable):</b>  <b>Not applicable to current Crisp Services</b>			
<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.	<u>Measure 3.1</u>		
	<u>Measure 3.2</u>		
	<u>Measure 3.3</u>		

**Reasons for *not subscribing* to Commitment 3 (if applicable):**

**Not applicable to current Crisp Services**

**Information on future considerations or plans [Optional]:**

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



<b>III. Political Advertising and Issue-based Advertising</b>			
<b><u>List of adopted commitments and measures</u></b>		<b><u>Subscribed</u></b>  <b><u>(including indication about which of the signatory's services are subscribed to)</u></b>	<b>Additional comment including:</b>  <ul style="list-style-type: none"> <li>• <b><u>Reason for not subscribing (at the service level)</u></b> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service)</li> </ul> [Provide these comments for each commitment/measure as relevant]
<b><u>Commitment 4</u></b>	<b><u>Measure 4.1</u></b>		
Relevant Signatories commit to adopt a common definition of “political and issue advertising”.	<b><u>Measure 4.2</u></b>		
	<b>Reasons for not subscribing to Commitment 4 (if applicable):</b>  <b>Not applicable to current Crisp Services</b>		
<b><u>Commitment 5</u></b>	<b><u>Measure 5.1</u></b>		
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			
<b>Reasons for not subscribing to Commitment 5 (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<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>		
	<u>Measure 6.2</u>		
	<u>Measure 6.3</u>		
	<u>Measure 6.4</u>		
	<u>Measure 6.5</u>		
<b>Reasons for <i>not subscribing</i> to Commitment 6 (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<u>Commitment 7</u>  Relevant Signatories commit to put proportionate and appropriate identity verification systems in place for	<u>Measure 7.1</u>		
	<u>Measure 7.2</u>		

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 7.3</u>		
	<u>Measure 7.4</u>		
<b>Reasons for <i>not subscribing to Commitment 7</i> (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<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>		
	<u>Measure 8.2</u>		
<b>Reasons for <i>not subscribing to Commitment 8</i> (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<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>		
	<u>Measure 9.2</u>		

<b>Reasons for <i>not subscribing</i> to Commitment 9 (if applicable):</b>			
<b>Not applicable to current Crisp Services</b>			
<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>Measure 10.1</u>		
	<u>Measure 10.2</u>		
<b>Reasons for <i>not subscribing</i> to Commitment 10 (if applicable):</b>			
<b>Not applicable to current Crisp Services</b>			
<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	<u>Measure 11.1</u>		
	<u>Measure 11.2</u>		
	<u>Measure 11.3</u>		

functionalities as well as a set of minimum search criteria for the application of APIs or other interfaces.	<u>Measure 11.4</u>		
<b>Reasons for <i>not subscribing to</i> Commitment 11 (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<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>		
	<u>Measure 12.2</u>		
	<u>Measure 12.3</u>		
<b>Reasons for <i>not subscribing to</i> Commitment 12 (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<u>Commitment 13</u>  Relevant Signatories agree to engage in ongoing monitoring and research to understand and respond	<u>Measure 13.1</u>		
	<u>Measure 13.2</u>		

to risks related to Disinformation in political or issue advertising.	<u>Measure 13.3</u>		
<b>Reasons for <i>not subscribing</i> to Commitment 13 (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<b>Information on future considerations or plans:</b> <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i>			

<b>IV. Integrity of Services</b>			
<b><u>List of adopted commitments and measures</u></b>		<b><u>Subscribed</u></b>  <b><u>(including indication about which of the signatory's services are subscribed to)</u></b>	<b>Additional comment including:</b>  <ul style="list-style-type: none"> <li>• <b><u>Reason for not subscribing (at the service level)</u></b> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service)</li> </ul> [Provide these comments for each commitment/measure as relevant]
<b><u>Commitment 14</u></b>  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	<u>Measure 14.1</u>		
	<u>Measure 14.2</u>		
	<u>Measure 14.3</u>		

<p>Tactics, Techniques and Procedures Framework, include:</p> <ul style="list-style-type: none"> <li>- The creation and use of fake accounts, account takeovers and bot-driven amplification,</li> <li>- Hack-and-leak operations,</li> <li>- Impersonation,</li> <li>- Malicious deep fakes,</li> <li>- The purchase of fake engagements,</li> <li>- Non-transparent paid messages or promotion by influencers,</li> <li>- The creation and use of accounts that participate in coordinated inauthentic behaviour,</li> <li>- User conduct aimed at artificially amplifying the reach or perceived public support for disinformation.</li> </ul>			
<p><b>Reasons for <i>not subscribing</i> to Commitment 14 (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></p>			
<p><u>Commitment 15</u></p>	<p><u>Measure 15.1</u></p>		
	<p><u>Measure 15.2</u></p>		



<p>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.</p>			
<p><b>Reason for <i>not subscribing to Commitment 15</i> (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></p>			
<p><u>Commitment 16</u></p> <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 16.1</u></p>		
	<p><u>Measure 16.2</u></p>		
<p><b>Reason for <i>not subscribing to Commitment 16</i> (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></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]*

<b>V. Empowering Users</b>			
<b><u>List of adopted commitments and measures</u></b>		<b><u>Subscribed</u></b>  <b><u>(including indication about which of the signatory's services are subscribed to)</u></b>	<b>Additional comment including:</b>  <ul style="list-style-type: none"> <li>• <b><u>Reason for not subscribing (at the service level)</u></b> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service)</li> </ul> [Provide these comments for each commitment/measure as relevant]
<b><u>Commitment 17</u></b>  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	<b><u>Measure 17.1</u></b>		
	<b><u>Measure 17.2</u></b>		
	<b><u>Measure 17.3</u></b>		
<b>Reasons for <i>not subscribing</i> to Commitment 17 (if applicable):</b>  <b>Not applicable to current Crisp Services</b>			
<b><u>Commitment 18</u></b>	<b><u>Measure 18.1</u></b>		

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 18.2</u>		
	<u>Measure 18.3</u>		
<b>Reasons for <i>not subscribing to</i> Commitment 18 (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<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>		
	<u>Measure 19.2</u>		
<b>Reason for <i>not subscribing to</i> Commitment 19 (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<u>Commitment 20</u>	<u>Measure 20.1</u>		

<p>Relevant Signatories commit to empower users with tools to assess the provenance and edit history or authenticity or accuracy of digital content</p>	<p><u>Measure 20.2</u></p>		
<p><b>Reason for <i>not subscribing</i> to Commitment 20 (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></p>			
<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>		
	<p><u>Measure 21.2</u></p>		
	<p><u>Measure 21.3</u></p>		
<p><b>Reason for <i>not subscribing</i> to Commitment 21 (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></p>			

<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>Measure 22.1</u>		
	<u>Measure 22.2</u>		
	<u>Measure 22.3</u>		
	<u>Measure 22.4</u>		
	<u>Measure 22.5</u>		
	<u>Measure 22.6</u>		
	<u>Measure 22.7</u>		
<b>Reason for <i>not subscribing</i> to Commitment 22 (if applicable):</b>  <b>Not applicable to current Crisp Services</b>			
<u>Commitment 23</u>	<u>Measure 23.1</u>		

<p>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</p>	<p><u>Measure 23.2</u></p>		
<p><b>Reason for <i>not subscribing</i> to Commitment 23 (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></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><b>Reason for <i>not subscribing</i> to Commitment 24 (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></p>			

<p><u>Commitment 25</u></p>	<p><u>Measure 25.1</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 25.2</u></p>		
<p><b>Reason for <i>not subscribing</i> to Commitment 25 (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></p>			
<p><b>Information on future considerations or plans:</b></p> <p><i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i></p>			



<b>VI. Empowering the Research Community</b>			
<u>List of adopted commitments and measures</u>		<u>Subscribed</u>  <u>(including indication about which of the signatory's services are subscribed to)</u>	<u>Additional comment including:</u>  <ul style="list-style-type: none"> <li>• <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)</li> </ul> [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>		
	<u>Measure 26.2</u>		
	<u>Measure 26.3</u>		
<b>Reasons for <i>not subscribing</i> to Commitment 26 (if applicable):</b>  <b>Not applicable to current Crisp Services</b>			

<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>Measure 27.1</u>		
	<u>Measure 27.2</u>		
	<u>Measure 27.3</u>		
	<u>Measure 27.4</u>		
<b>Reason for <i>not subscribing</i> to Commitment 27 (if applicable):</b>  <b>Not applicable to current Crisp Services</b>			
<u>Commitment 28</u>  Relevant Signatories commit to support good faith research into Disinformation that involve their services	<u>Measure 28.1</u>		
	<u>Measure 28.2</u>		
	<u>Measure 28.3</u>		
	<u>Measure 28.4</u>		
<b>Reason for <i>not subscribing</i> to Commitment 28 (if applicable):</b>  <b>Not applicable to current Crisp Services</b>			

<p><u>Commitment 29</u></p> <p>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</p>	<p><u>Measure 29.1</u></p>	<p>PLATFORM RISK INTELLIGENCE</p>	<p>29.1.1 – Overarching Thematic Reporting 29.1.2 – Transparency Centre will be updated with subset of Thematic Reporting subject to Crisp Customer sign-off 29.1.3- Types of research and Thematic findings can be shared – specific methodologies are not able to be shared at this immediate point due to IP considerations. Crisp will seek to expand these going forward.</p>
	<p><u>Measure 29.2</u></p>	<p>PLATFORM RISK INTELLIGENCE</p>	<p>29.2.1 – Overarching Thematic Reporting 29.2.2 – Transparency Centre will be updated with subset of effectiveness measures subject to Crisp Customer sign-off 29.2.3- Types of research and Thematic findings can be shared – specific methodologies are not able to be shared at this immediate point due to IP considerations. Crisp will seek to expand these going forward.</p>
	<p><u>Measure 29.3</u></p>	<p>PLATFORM RISK INTELLIGENCE</p>	<p>Not Applicable to Crisp Services</p>
<p><b>Reason for <i>not subscribing</i> to Commitment 29 (if applicable):</b></p> <p><u>N/A</u></p>			
<p><b>Information on future considerations or plans:</b></p>			

*Aligned to the continued growth of online services and regions – providing prioritised support to national elections, new and emergent geographies that are more susceptible to Disinformation campaigns. Continuing to develop capabilities to support Enterprise / Corporate entities who are also susceptible to orchestrated Disinformation campaigns.*

<b>VII. Empowering the Fact-checking Community</b>			
<b><u>List of adopted commitments and measures</u></b>		<b><u>Subscribed</u></b> <b>(including indication about which of the signatory's services are subscribed to)</b>	<b>Additional comment including:</b>  <ul style="list-style-type: none"> <li>• <b><u>Reason for not subscribing (at the service level)</u></b> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service)</li> </ul> [Provide these comments for each commitment/measure as relevant]
<b><u>Commitment 30</u></b>  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.	<b><u>Measure 30.1</u></b>		
	<b><u>Measure 30.2</u></b>		
	<b><u>Measure 30.3</u></b>		
	<b><u>Measure 30.4</u></b>		
<b>Reasons for <i>not subscribing</i> to Commitment 30 (if applicable):</b>  <b>Not applicable to current Crisp Services</b>			
<b><u>Commitment 31</u></b>	<b><u>Measure 31.1</u></b>		

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>		
	<u>Measure 31.3</u>		
	<u>Measure 31.4</u>		
<b>Reason for <i>not subscribing</i> to Commitment 31 (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<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>		
	<u>Measure 32.2</u>		
	<u>Measure 32.3</u>		
<b>Reason for <i>not subscribing</i> to Commitment 32 (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<u>Commitment 33</u>	<u>Measure 33.1</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.			
<b>Reason for <i>not subscribing</i> to Commitment 33 (if applicable):</b>  <b>Not applicable to current Crisp Services</b>			
<b>Information on future considerations or plans:</b>  <i>[If applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future]</i>			

<b>VIII. Transparency Centre</b>			
<b><u>List of adopted commitments and measures</u></b>		<b><u>Subscribed</u></b>  <b><u>(including indication about which of the signatory's services are subscribed to)</u></b>	<b>Additional comment including:</b>  <ul style="list-style-type: none"> <li>• <b><u>Reason for not subscribing (at the service level)</u></b> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service)</li> </ul> [Provide these comments for each commitment/measure as relevant]
<b><u>Commitment 34</u></b>  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	<b><u>Measure 34.1</u></b>		
	<b><u>Measure 34.2</u></b>		
	<b><u>Measure 34.3</u></b>		
	<b><u>Measure 34.4</u></b>		
	<b><u>Measure 34.5</u></b>		
<b>Reasons for <i>not subscribing</i> to Commitment 34 (if applicable):</b>  <b>Not applicable to current Crisp Services</b>			
<b><u>Commitment 35</u></b>	<b><u>Measure 35.1</u></b>		



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 35.2</u>		
	<u>Measure 35.3</u>		
	<u>Measure 35.4</u>		
	<u>Measure 35.5</u>		
	<u>Measure 35.6</u>		
<b>Reason for <i>not subscribing</i> to Commitment 35 (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<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>		
	<u>Measure 36.2</u>		
	<u>Measure 36.3</u>		
<b>Reason for <i>not subscribing</i> to Commitment 36 (if applicable):</b> <b>Not applicable to current Crisp Services</b>			
<b>Information on future considerations or plans:</b>			

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

<b>IX. Task-force</b>			
<b><u>List of adopted commitments and measures</u></b>		<b><u>Subscribed</u></b>  <b><u>(including indication about which of the signatory's services are subscribed to)</u></b>	<b>Additional comment including:</b>  <ul style="list-style-type: none"> <li>• <b><u>Reason for not subscribing (at the service level)</u></b> , including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service)</li> </ul> [Provide these comments for each commitment/measure as relevant]
<b><u>Commitment 37</u></b>  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.	<b><u>Measure 37.1</u></b>	<i>PLATFORM RISK INTELLIGENCE</i>	<i>Crisp to contribute as is appropriate based on the scale of the reporting and recognising client confidentiality</i>
	<b><u>Measure 37.2</u></b>	<i>PLATFORM RISK INTELLIGENCE</i>	<i>Crisp to contribute as is appropriate based on the scale of the reporting and recognising client confidentiality</i>
	<b><u>Measure 37.3</u></b>	<i>PLATFORM RISK INTELLIGENCE</i>	<i>Crisp to contribute as is appropriate based on the scale of the reporting and recognising client confidentiality</i>
	<b><u>Measure 37.4</u></b>	<i>PLATFORM RISK INTELLIGENCE</i>	<i>Crisp to contribute as is appropriate based on the scale of the reporting and recognising client confidentiality</i>

	<u>Measure 37.5</u>	PLATFORM RISK INTELLIGENCE	<i>Crisp to contribute as is appropriate based on the scale of the reporting and recognising client confidentiality</i>
	<u>Measure 37.6</u>	PLATFORM RISK INTELLIGENCE	<i>Crisp to contribute as is appropriate based on the scale of the reporting and recognising client confidentiality</i>
<p><b>Reasons for <i>not subscribing</i> to Commitment 37 (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></p>			
<p><b>Information on future considerations or plans:</b></p> <p><i>Understanding the level of detail and overarching engagement. Crisp will contribute but may on occasion need to recognise the confidential nature of our work in order to remain effective.</i></p>			

<b>X. Monitoring Framework</b>		
<b><u>List of adopted commitments and measures</u></b>	<b><u>Subscribed</u></b> <b><u>(including indication about which of the signatory's services are subscribed to)</u></b>	<b>Additional comment including:</b>  <ul style="list-style-type: none"> <li>● <b><u>Reason for not subscribing (at the service level)</u></b>, including clarification regarding relevance and pertinence to a service (including by clearly indicating the relevant service)</li> </ul> [Provide these comments for each commitment/measure as relevant]
<b><u>Commitment 38</u></b>  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.		
<b>Reasons for <i>not subscribing to</i> Commitment 38 (if applicable):</b>  <b>Not applicable to current Crisp Services</b>		
<b><u>Commitment 39</u></b>		

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.			
<b>Reasons for <i>not subscribing</i> to Commitment 39 (if applicable):</b>			
<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.	<u>Measure 40.1</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>		
<b>Reason for <i>not subscribing</i> to Commitment 40 (if applicable):</b>  <b>Not applicable to current Crisp Services</b>			
<u>Commitment 41</u>	<u>Measure 41.1</u>		

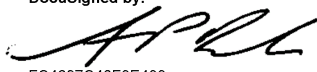
<p>Signatories commit to work within the Task-force towards developing Structural Indicators and deliver a first set of them within 9 months from the signature of this Code; and to publish an initial measurement alongside their first full report. To achieve this goal, Signatories commit to support their 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</p>	<u>Measure 41.2</u>		
	<u>Measure 41.3</u>		
<p><b>Reason for <i>not subscribing</i> to Commitment 41 (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></p>			
<p><u>Commitment 42</u></p> <p>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</p>			
<p><b>Reason for <i>not subscribing</i> to Commitment 42 (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></p>			

<p><u>Commitment 43</u></p> <p>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</p>	
<p><b>Reason for <i>not subscribing</i> to Commitment 43 (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></p>	
<p><u>Commitment 44</u></p> <p>Relevant Signatories that are providers of Very Large Online Platforms commit, seeking alignment with the Digital Services Act, to be audited at their own expense, for their compliance with the commitments undertaken pursuant to this Code. Audits should be performed by organisations, independent from, and without conflict of interest with, the provider of the Very Large Online Platform concerned. Such organisations shall have proven expertise in the area of disinformation, appropriate technical competence and capabilities and have proven objectivity and professional ethics, based in particular on adherence to auditing standards and guidelines</p>	
<p><b>Reason for <i>not subscribing</i> to Commitment 44 (if applicable):</b></p> <p><b>Not applicable to current Crisp Services</b></p>	
<p><b>Information on future considerations or plans:</b></p>	



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

*Signature*

DocuSigned by:  
  
FC4697C40F8E488...

*Date and place* 15/6/2022

United  
Kingdom