



Subscription document for Signatories that are not major online platforms

CODE OF PRACTICE 2022



Name of the Signatory

DoubleVerify (DV)

About the Signatory

DoubleVerify (DV) is a leading software platform for digital media measurement and analytics. Our mission is to make the digital advertising ecosystem stronger, safer and more secure, thereby preserving the fair value exchange between buyers and sellers of digital media. Hundreds of Fortune 500 advertisers employ our unbiased data and analytics to drive campaign quality and effectiveness, and to maximize return on their digital advertising investments – globally.

On the chapters, commitments and measures

[Declare to which chapter(s) the signatory will subscribe and provide a general explanation]

DV's solutions have increased in sophistication in order to support brands and advertisers and provide education to help them understand how to strike the right balance between protection and scale. In 2016, DV pioneered its Inflammatory Politics & News category. This content category allows advertisers to avoid content that includes disinformation, misinformation, propaganda, extremist point of views and/or inflammatory political rhetoric.

To comprehensively identify Inflammatory Politics & News, our team assesses content by looking at the structure, language, rhetoric and any association with organizations known for perpetuating misinformation or inflammatory content. DV also analyzes a range of other inputs and sources including expert third-party reporting and data from [Storyzy](#), a technology company that offers automated solutions for tracking inflammatory political content and misinformation online, across multiple languages.

DoubleVerify (DV) is fully committed to making a stronger, safer and more secure ad ecosystem for all.





DV is committed to helping advertiser and platform partners to avoid and de-incentivise inflammatory news / disinformation through education, industry action and delivering best in class solutions that many advertisers concerned with disinformation and controversial political content can utilise.

DV believes in the value of trusted news content and is committed to encouraging all brands to advertise across trusted news sites as broadly as possible (unless there is a direct connection between a news incident and their brand) and provide our clients with the tools to be able to support trusted news content and quality journalism whilst also protecting brand equity.

With this in mind, DV will be committing to the chapter I, II, IX, X





Example of Subscription Document

II. SCRUTINY OF AD PLACEMENTS		
List of adopted commitments and measures ¹		Qualitative reporting elements and service level indicators²
<u>Commitment 1</u> Relevant Signatories participating in ad placements, commit to defund the dissemination of Disinformation, 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 1.5</u> Relevant Signatories involved in the reporting of monetisation activities inclusive of media platforms, ad networks, and ad verification companies will take the necessary steps to give industry-recognised relevant independent third-party auditors commercially appropriate and fair access to their services and data in order to: <ul style="list-style-type: none">- First, confirm the accuracy of first party reporting relative to monetisation and Disinformation, seeking alignment with regular audits performed under the DSA.- Second, accreditation services should assess the effectiveness of media platforms' policy enforcement, including Disinformation policies.	<u>QRE 1.5.1</u> Signatories that conduct independent accreditation via audits will disclose areas of their accreditation that have been updated to reflect needs in Measure 1.5.

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





	<p><u>Measure 1.6</u> Relevant Signatories will advance the development, improve the availability, and take practical steps to advance the use of brand safety tools and partnerships, with the following goals:</p>	<p><u>QRE 1.6.3</u> Signatories that provide brand safety tools will outline how they are ensuring transparency and appealability about their processes and outcomes.</p>
<p><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.</p>	<p><u>Measure 3.1</u> Relevant Signatories will cooperate with platforms, advertising supply chain players, source-rating services, services that provide indicators of trustworthiness, fact-checking organisations, advertisers and any other actors active in the online monetisation value chain, to facilitate the integration and flow of information, in particular information relevant for tackling purveyors of harmful Disinformation, in full respect of all relevant data protection rules and confidentiality agreements.</p>	<p><u>QRE 3.1.1</u> Signatories will outline how they work with others across industry and civil society to facilitate the flow of information that may be relevant for tackling purveyors of harmful Disinformation.</p>





	<p><u>Measure 3.2</u></p> <p>Relevant Signatories will exchange among themselves information on Disinformation trends and TTPs (Tactics, Techniques, and Procedures), via the Code Task-force, GARM, IAB Europe, or other relevant fora. This will include sharing insights on new techniques or threats observed by Relevant Signatories, discussing case studies, and other means of improving capabilities and steps to help remove Disinformation across the advertising supply chain - potentially including real-time technical capabilities.</p>	<p><u>QRE 3.2.1</u></p> <p>Relevant Signatories will exchange among themselves information on Disinformation trends and TTPs (Tactics, Techniques, and Procedures), via the Code Task-force, GARM, IAB Europe, or other relevant fora. This will include sharing insights on new techniques or threats observed by Relevant Signatories, discussing case studies, and other means of improving capabilities and steps to help remove Disinformation across the advertising supply chain - potentially including real-time technical capabilities.</p>
	<p><u>Measure 3.3</u></p> <p>Relevant Signatories will integrate the work of or collaborate with relevant third-party organisations, such as independent source-rating services, services that provide indicators of trustworthiness, fact-checkers, researchers, or open-source investigators, in order to reduce monetisation of Disinformation and avoid the dissemination of advertising containing Disinformation.</p>	<p><u>QRE 3.3.1</u></p> <p>Signatories will report on the collaborations and integrations relevant to their work with organisations mentioned.</p>





VIII. TRANSPARENCY CENTRE		
List of adopted commitments and measures ³		Qualitative reporting elements and service level indicators⁴
<u>Commitment 34</u> To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website.	<u>Measure 34.3</u> Relevant Signatories will contribute to the Transparency Centre’s information to the extent that the Code is applicable to their services.	<u>QRE 36.1.2</u> Signatories will outline changes to the Transparency Centre’s content, operations, or functioning in their reports over time. Such updates can be drafted jointly by Signatories involved in operating or adding content to the Transparency Centre.

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





IX. PERMANENT TASK FORCE		
List of adopted commitments and measures ⁵		Qualitative reporting elements and service level indicators⁶
<u>Commitment 37</u> Signatories commit to participate in the permanent Task-force. The Task-force includes the Signatories of the Code and representatives from EDMO and ERGA. It is chaired by the European Commission, and includes representatives of the European External Action Service (EEAS). The Task-force can also invite relevant experts as observers to support its work. Decisions of the Task-force are made by consensus.	<u>Measure 37.1</u> Signatories will participate in the Task-force and contribute to its work. Signatories, in particular smaller or emerging services will contribute to the work of the Task-force proportionate to their resources, size and risk profile. Smaller or emerging services can also agree to pool their resources together and represent each other in the Task-force. The Task-force will meet in plenary sessions as necessary and at least every 6 months, and, where relevant, in subgroups dedicated to specific issues or workstreams.	<u>QRE 37.6.1</u> Signatories will describe how they engage in the work of the Task-force in the reporting period, including the sub-groups they engaged with.

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





	<p><u>Measure 37.2</u></p> <p>Signatories agree to work in the Task-force in particular – but not limited to – on the following tasks:</p> <ul style="list-style-type: none">- Establishing a risk assessment methodology and a rapid response system to be used in special situations like elections or crises.- Cooperate and coordinate their work in special situations like elections or crisis- Agree on the harmonised reporting templates for the implementation of the Code’s Commitments and Measures, the refined methodology of the reporting, and the relevant data disclosure for monitoring purposes.- Review the quality and effectiveness of the harmonised reporting templates, as well as the formats and methods of data disclosure for monitoring purposes, throughout future monitoring cycles and adapt them, as needed.- Contribute to the assessment of the quality and effectiveness of Service Level and Structural Indicators and the data points provided to measure these indicators, as well as their relevant adaptation.	
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	<ul style="list-style-type: none">- Refine, test and adjust Structural Indicators and design mechanisms to measure them at Member State level.- Agree, publish and update a list of TTPs employed by malicious actors, and set down baseline elements, objectives and benchmarks for Measures to counter them, in line with the Chapter IV of this Code.- Seek out and discuss research, expert input and up-to-date evidence relevant to the Code's commitments, such as, inter alia, emerging best practices in safe design, retroactive flagging, repository of fact-checks, provenance tools.- Discuss and provide guidance on the adequate quantitative information to be provided by signatories to fulfil their reporting obligations regarding agreements with fact-checking organisations across different services.- Regularly discuss whether the Code's Commitments and Measures need updating in view of technological, societal, market and legislative developments, as well as in view of accommodating new signatories and, where the Task-force agrees to be necessary, carry out such updates.- Review the appropriateness and consistency of adapted Measures for smaller or emerging services.	
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	<ul style="list-style-type: none">- Promote the Code among relevant peers and integrate new Signatories to the Code.	
	<p><u>Measure 37.3</u></p> <p>The Task-force will agree on and define its operating rules, including on the involvement of third-party experts, which will be laid down in a Vademecum drafted by the European Commission in collaboration with the Signatories and agreed on by consensus between the members of the Task-force.</p>	
	<p><u>Measure 37.4</u></p> <p>Signatories agree to set up subgroups dedicated to the specific issues related to the implementation and revision of the Code with the participation of the relevant Signatories.</p>	
	<p><u>Measure 37.5</u></p> <p>When needed, and in any event at least once per year the Task-force organises meetings with relevant stakeholder groups and</p>	





	<p>experts to inform them about the operation of the Code and gather their views related to important developments in the field of Disinformation.</p>	
	<p><u>Measure 37.6</u></p> <p>Signatories agree to notify the rest of the Task-force when a Commitment or Measure would benefit from changes over time as their practices and approaches evolve, in view of technological, societal, market, and legislative developments. Having discussed the changes required, the Relevant Signatories will update their subscription document accordingly and report on the changes in their next report.</p>	





X. MONITORING OF THE CODE		
List of adopted commitments and measures ⁷		Qualitative reporting elements and service level indicators⁸
<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.	There is no measure for this commitment	There is no QRE or SLI for this commitment
<u>Commitment 40</u> Signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting		

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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





<p>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 40.4</u></p> <p>Signatories will develop, within the Task-force, harmonised reporting templates.</p>	
	<p><u>Measure 40.5</u></p> <p>Signatories will regularly work to improve and optimise the monitoring and reporting framework of the Code, including the SLIs, within the Task-force, building in particular on feedback from the European Commission, ERGA and EDMO.</p>	
	<p><u>Measure 40.6</u></p> <p>Signatories will cooperate with the European Commission, respond to its reasonable requests and provide the European Commission with reasonable information, data and further input necessary to assess the implementation of the Code, allowing for the Code's efficient and thorough monitoring, including at Member State Level.</p>	





Commitment 41

— Signatories commit to work within the Task-force towards developing Structural Indicators, and publish 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.

Measure 41.1

Within 1 month of signing the Code, Signatories will establish a Working Group to tackle this objective. This working group will be tasked with putting forward data points to be provided by Platform Signatories, and a methodology to measure Structural Indicators on the base of these data points, to be executed by non-Platform Signatories. Signatories will share data points appropriate to enable the measurement of metrics to be determined by the working group, such as prevalence or other contextualised metrics for sources and spread of online disinformation. Signatories will assess the work that will be necessary to deliver on the goals of this commitment, and discuss within the Task-force whether financial support is required.

Measure 41.2

The Working Group will report on its progress to the Task-force on a trimestral basis. It will consult with expert stakeholders including but not limited to EDMO, ERGA, and researchers to inform its work and outputs. 7 months after the signing of the Code, a conference will be convened with external stakeholders to

There is no QRE or SLI for this commitment





	<p>present on progress thus far and seek feedback.</p>	
	<p><u>Measure 41.3</u></p> <p>By 6 months after the signing of the Code, the Working Group will table with the Task-force a workable proposal for such Structural Indicators. By 9 months, relevant Signatories will provide to others within the Working Group the data points required to measure the Structural Indicators, and they will share publicly the aligned Structural Indicators. The Working Group will publish their measurements for the Structural Indicators in line with the first full report by the Signatories, as well as its full methodology, with the understanding that those may still require refinements over time. Signatories commit to keep updating the measurements, aligned with their reporting periods. Measurements will be published on the Transparency Centre in a way that allow to monitor them over time for the entire ecosystem and between different services.</p>	





Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)

DV has chosen the relevant commitments in II. Scrutiny of Ad Placements that are relevant DV's services, and relevant horizontal commitments, in sections VIII, IX and X, which are important for a uniform implementation of the Code and its future. Our level of commitment to these measures is commensurate with the proportion of the code which applies to our business.

Jack Smith

Signature:

Jack Smith

Jack Smith (Jun 27, 2022 18:45 EDT)

Date and place:

Jun 27, 2022



DoubleVerify 00034452 - Subscription Agreement

Final Audit Report

2022-06-27

Created:	2022-06-23
By:	Michael Balcewicz (michael.balcewicz@doubleverify.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAPuMxlLYzyS0c0e5r3aNe2iKGEcS7taZS

"DoubleVerify 00034452 - Subscription Agreement" History

 Document created by Michael Balcewicz (michael.balcewicz@doubleverify.com)

2022-06-23 - 10:12:52 PM GMT- IP address: 13.110.78.8

 Document emailed to jack.smith@doubleverify.com for signature

2022-06-23 - 10:13:20 PM GMT

 Email viewed by jack.smith@doubleverify.com

2022-06-27 - 10:44:57 PM GMT- IP address: 108.46.149.178

 Document e-signed by Jack Smith (jack.smith@doubleverify.com)

Signature Date: 2022-06-27 - 10:45:36 PM GMT - Time Source: server- IP address: 108.46.149.178

 Agreement completed.

2022-06-27 - 10:45:36 PM GMT