

EU CODE OF PRACTICE ON DISINFORMATION 2022

Subscription Document for Microsoft

Contents

| | |
|--|----|
| II. Scrutiny of Ad Placements | 6 |
| III. Political Advertising and Issue-based Advertising | 9 |
| IV. Integrity of Services | 15 |
| V. Empowering Users | 18 |
| VI. Empowering the Research Community | 24 |
| VII. Empowering the Fact-checking Community | 27 |
| VIII. Transparency Centre | 30 |
| IX. Task-force | 32 |
| X. Monitoring Framework | 33 |

Name of the Signatory

Microsoft Corporation

About the Signatory

Microsoft is a technology company whose mission is to empower every person and every organization on the planet to achieve more. We strive to create local opportunity, growth, and impact in every country around the world. Our platforms and tools help drive small business productivity, large business competitiveness, and public-sector efficiency. They also support new startups, improve educational and health outcomes, and empower human ingenuity.

Founded in 1975, we develop and support software, services, devices, and solutions that deliver new value for customers and help people and businesses realize their full potential. We offer an array of services, including cloud-based solutions that provide customers with software, services, platforms, and content, and we provide solution support and consulting services. We also deliver relevant online advertising to a global audience. Our products include operating systems, cross-device productivity applications, server applications, business solution applications, desktop and server management tools, software development tools, and video games. We also design and sell devices, including PCs, tablets, gaming and entertainment consoles, other intelligent devices, and related accessories.

While we do not run any of the leading general purpose social media platforms, and none of our services have been among those which are used as the primary vectors for disseminating disinformation, Microsoft fully supports the objectives of the Code and we are committed to actively working with Signatories and the European Commission in the context of this Code to defend against disinformation on our services as listed below.

Microsoft is committed to instilling trust and security across the company' products and services, and across the broader web. We aim to ensure our users have a positive experience on our platforms. As a general rule, our services have been targeted far less frequently by bad actors seeking to spread disinformation than many other (platform) services falling within the scope of the European Code of Practice on Disinformation (the "Code"). This is

mainly due to the fact that bad actors typically use online services directed at consumers to disseminate disinformation, while many of Microsoft's services are either offered primarily or exclusively to enterprise customers or used by individuals acting in a predominantly professional capacity.

To this end, Microsoft has signed on to all areas of the Code which are relevant or pertinent to these services as outlined in this document. Moreover, Microsoft and its services will continually review its commitments and measures as practices and approaches evolve and in view of technological, societal, market and legislative developments, in line with the Code.

For the purpose of this Code, "Microsoft" refers to the applicable services as listed below, managed by the respective Microsoft subsidiaries or affiliates.

- **Microsoft Bing** is one of the world's leading search engines. Disinformation may at times appear in both organic and paid search results, and we take active steps to counter it. It is worth emphasizing, however, that addressing disinformation in organic search results often requires a different approach than may be appropriate for other types of online services, such as social media services. Even in the general purpose case of material that is known (or suspected) to be false, outright censorship of such information in organic search results is generally not appropriate. Importantly, blocking content in organic search results can raise significant fundamental rights concerns relating to freedom of expression and the freedom to receive and impart information. So while Bing generally strives to rank its organic search results so that trusted, authoritative news and information appear first, and provides tools that help Bing users evaluate the trustworthiness of certain sites, we also believe that enabling users to find all types of information through a search engine can provide important public benefits.
- **Microsoft Advertising** is Microsoft's proprietary online advertising platform that serves the vast majority of ads displayed on Microsoft Bing and provides advertising to most other Microsoft services that display ads, as well as many third-party services. Microsoft Advertising employs a distinct set of policies and enforcement measures to prevent the spread of Disinformation through advertising.
- **LinkedIn** is a real identity professional network where members can find jobs, connect and strengthen professional relationships, and learn the skills they need to succeed in their careers. Accordingly, the content on LinkedIn is professional in nature. LinkedIn's [Professional Community Policies](#) clearly detail what is expected of every member as they post, share and comment on the platform, including that disinformation is not permitted on LinkedIn.

As such, Microsoft will assess and implement approaches relevant and pertinent to its services to accomplish the aims of the Code. We recognize our responsibility to ensuring trust in our online ecosystem and look forward to continuing to make progress in Europe following the signing of this Code.

| <i>Service name</i> | <i>Description of the service</i> |
|-----------------------|------------------------------------|
| Microsoft Advertising | Online advertising platform |
| Microsoft Bing | Search engine |
| LinkedIn | Real-identity professional network |

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.

| II. Scrutiny of Ad Placements | | | |
|---|--------------------|---|--|
| <u>List of commitments and measures</u> | | <u>Subscribed</u> (including indication about which of the signatory's services are subscribed to) | 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> | Microsoft Advertising LinkedIn | |
| | <u>Measure 1.2</u> | Microsoft Advertising LinkedIn | |
| | <u>Measure 1.3</u> | Microsoft Advertising LinkedIn | |
| | <u>Measure 1.4</u> | LinkedIn | This Measure is not relevant or pertinent for Microsoft Advertising as it does not buy advertising, inclusive of advertisers, and agencies. |
| | <u>Measure 1.5</u> | Microsoft Advertising | |

| | | | |
|---|--------------------|-----------------------------------|--|
| | | LinkedIn | |
| | <u>Measure 1.6</u> | Microsoft Advertising LinkedIn | |
| 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> | Microsoft Advertising LinkedIn | |
| | <u>Measure 2.2</u> | Microsoft Advertising LinkedIn | |
| | <u>Measure 2.3</u> | Microsoft Advertising LinkedIn | |
| | <u>Measure 2.4</u> | Microsoft Advertising LinkedIn | |
| Reasons for <i>not subscribing</i> to Commitment 2 (if applicable): | | | |
| <u>Commitment 3</u> | <u>Measure 3.1</u> | Microsoft Advertising LinkedIn | |

| | | | |
|---|---------------------------|---|--|
| <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>Microsoft Advertising LinkedIn</p> | |
| | <p><u>Measure 3.3</u></p> | <p>Microsoft Advertising LinkedIn</p> | |
| <p>Reasons for <i>not subscribing</i> to Commitment 3 (if applicable):</p> | | | |

III. Political Advertising and Issue-based Advertising

| <u>List of adopted commitments and measures</u> | | <u>Subscribed</u> (including indication about which of the signatory's services are subscribed to) | 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> Relevant Signatories commit to adopt a common definition of “political and issue advertising”. | <u>Measure 4.1</u> | Microsoft Advertising LinkedIn | |
| | <u>Measure 4.2</u> | Microsoft Advertising LinkedIn | |
| Reasons for not subscribing to Commitment 4 (if applicable): | | | |
| <u>Commitment 5</u> Relevant Signatories commit to apply a consistent approach across political and issue advertising on | <u>Measure 5.1</u> | Microsoft Advertising LinkedIn | LinkedIn and Microsoft Advertising, as of the signature date of this document, prohibit advertising that may be in scope of this section, including ads advocating for or against a particular candidate, party, or ballot |

| | | | |
|--|---------------------------|--|---|
| <p>their services and to clearly indicate in their advertising policies the extent to which such advertising is permitted or prohibited on their services</p> | | | <p>proposition or otherwise intended to influence an election outcome; ads fundraising for or by political candidates, parties, political action committees or similar organizations, or ballot propositions; and ads exploiting a sensitive political issue even if the advertiser has no explicit political agenda.</p> |
| <p>Reasons for not subscribing to Commitment 5 (if applicable):</p> | | | |
| <p><u>Commitment 6</u></p> <p>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</p> | <p><u>Measure 6.1</u></p> | | |
| | <p><u>Measure 6.2</u></p> | | |
| | <p><u>Measure 6.3</u></p> | | |
| | <p><u>Measure 6.4</u></p> | | |
| | <p><u>Measure 6.5</u></p> | | |
| <p>Reasons for <i>not subscribing</i> to Commitment 6 (if applicable):</p> <p>Commitment 6 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow political or issue-based advertising as set out in more detail under measure 5.1.</p> | | | |
| <p><u>Commitment 7</u></p> | <p><u>Measure 7.1</u></p> | | |

| | | | |
|--|---------------------------|--|--|
| <p>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.</p> | <p><u>Measure 7.2</u></p> | | |
| | <p><u>Measure 7.3</u></p> | <p>Microsoft Advertising</p> <p>LinkedIn</p> | |
| | <p><u>Measure 7.4</u></p> | | |
| <p>Reasons for <i>not subscribing to Commitment 7</i> (if applicable):</p> <p>Commitment 7 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow political or issue-based advertising as set out in more detail under measure 5.1, except for Measure 7.3 as it relates to reporting ads that may violate the respective policies.</p> | | | |
| <p><u>Commitment 8</u></p> <p>Relevant Signatories commit to provide transparency information to users about the political or issue ads they see on their service.</p> | <p><u>Measure 8.1</u></p> | | |
| | <p><u>Measure 8.2</u></p> | | |
| <p>Reasons for <i>not subscribing to Commitment 8</i> (if applicable):</p> <p>Commitment 8 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow political or issue-based advertising as set out in more detail under measure 5.1.</p> | | | |
| <p><u>Commitment 9</u></p> | <p><u>Measure 9.1</u></p> | | |

| | | | |
|--|----------------------------|--|--|
| <p>Relevant Signatories commit to provide users with clear, comprehensible, comprehensive information about why they are seeing a political or issue ad.</p> | <p><u>Measure 9.2</u></p> | | |
| <p>Reasons for <i>not subscribing to Commitment 9</i> (if applicable):</p> <p>Commitment 9 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow political or issue-based advertising as set out in more detail under measure 5.1.</p> | | | |
| <p><u>Commitment 10</u></p> | <p><u>Measure 10.1</u></p> | | |
| <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>Reasons for <i>not subscribing to Commitment 10</i> (if applicable):</p> <p>Commitment 10 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow political or issue-based advertising as set out in more detail under measure 5.1.</p> | | | |
| <p><u>Commitment 11</u></p> | <p><u>Measure 11.1</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 11.2</u></p> | | |
| | <p><u>Measure 11.3</u></p> | | |
| | <p><u>Measure 11.4</u></p> | | |
| <p>Reasons for <i>not subscribing to Commitment 11</i> (if applicable):</p> <p>Commitment 11 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow political or issue-based advertising as set out in more detail under measure 5.1.</p> | | | |
| <p><u>Commitment 12</u></p> <p>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.</p> | <p><u>Measure 12.1</u></p> | | |
| | <p><u>Measure 12.2</u></p> | | |
| | <p><u>Measure 12.3</u></p> | | |
| <p>Reasons for <i>not subscribing to Commitment 12</i> (if applicable):</p> <p>Commitment 12 is aimed specifically at civil society organisations and therefore it is not relevant or pertinent to Microsoft and its services.</p> | | | |

| | | | |
|--|---------------------|--|--|
| <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> | | |
| | <u>Measure 13.2</u> | | |
| | <u>Measure 13.3</u> | | |
| Reasons for <i>not subscribing to Commitment 13</i> (if applicable): Commitment 6 is not relevant or pertinent for LinkedIn and Microsoft Advertising as they do not allow political or issue-based advertising as set out in more detail under measure 5.1. | | | |

| IV. Integrity of Services | | | |
|---|---------------------|---|--|
| <u>List of adopted commitments and measures</u> | | <u>Subscribed</u> (including indication about which of the signatory's services are subscribed to) | 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 14</u> 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> | Microsoft Bing LinkedIn | |
| | <u>Measure 14.2</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 14.3</u> | Microsoft Bing LinkedIn | |

| | | | |
|---|----------------------------|------------------------------------|--|
| <p>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, - 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. | | | |
| <p>Reasons for <i>not subscribing</i> to Commitment 14 (if applicable):</p> | | | |
| <p><u>Commitment 15</u></p> | <p><u>Measure 15.1</u></p> | <p>Microsoft Bing LinkedIn</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><u>Measure 15.2</u></p> | <p>Microsoft Bing LinkedIn</p> | |
| <p>Reason for <i>not subscribing</i> to Commitment 15 (if applicable):</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>Microsoft Bing LinkedIn</p> | |
| | <p><u>Measure 16.2</u></p> | <p>LinkedIn</p> | <p>This Measure is not relevant or pertinent to Microsoft Bing because this service does not have users who can share content across services.</p> |
| <p>Reason for <i>not subscribing</i> to Commitment 16 (if applicable):</p> | | | |

| V. Empowering Users | | | |
|---|----------------------------|---|---|
| <u>List of adopted commitments and measures</u> | | <u>Subscribed</u> (including indication about which of the signatory's services are subscribed to) | 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> | Microsoft Bing LinkedIn | |
| | <u>Measure 17.2</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 17.3</u> | Microsoft Bing LinkedIn | |
| Reasons for <i>not subscribing</i> to Commitment 17 (if applicable): | | | |
| <u>Commitment 18</u> | <u>Measure 18.1</u> | LinkedIn | This measure is not relevant or pertinent to Microsoft Bing as search engines do not fuel |

| | | | |
|--|---------------------|----------------------------|---|
| 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 | | | virality of disinformation via users sharing content. |
| | <u>Measure 18.2</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 18.3</u> | Microsoft Bing LinkedIn | |
| 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> | Microsoft Bing LinkedIn | |
| | <u>Measure 19.2</u> | Microsoft Bing LinkedIn | |
| Reason for <i>not subscribing to Commitment 19</i> (if applicable): | | | |
| <u>Commitment 20</u> | <u>Measure 20.1</u> | Microsoft Bing LinkedIn | |

| | | | |
|---|---------------------|----------------------------|--|
| Relevant Signatories commit to empower users with tools to assess the provenance and edit history or authenticity or accuracy of digital content | <u>Measure 20.2</u> | Microsoft Bing LinkedIn | |
| Reason for <i>not subscribing to Commitment 20</i> (if applicable): | | | |
| <u>Commitment 21</u> 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 | <u>Measure 21.1</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 21.2</u> | LinkedIn | This Measure is not relevant or pertinent to Microsoft Bing as it does not host the content and cannot assess the extent to which content on indexed landing pages has reached its users. |
| | <u>Measure 21.3</u> | Microsoft Bing LinkedIn | |
| Reason for <i>not subscribing to Commitment 21</i> (if applicable): | | | |
| <u>Commitment 22</u> | <u>Measure 22.1</u> | LinkedIn | This Measure is not relevant or pertinent to Microsoft Bing as it does not allow users to share content. However, Bing will, where appropriate, provide users with information on the availability of credibility extensions for the |

| | | | |
|---|---------------------|------------------------------------|--|
| <p>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</p> | | | <p>Microsoft Edge browser, such as the extension currently offered by NewsGuard, and provide, in appropriate cases, links to access those extensions. Bing will continue to explore whether and how other indicators of trustworthiness may be useful to users in the context of search.</p> |
| | <u>Measure 22.2</u> | <p>Microsoft Bing LinkedIn</p> | |
| | <u>Measure 22.3</u> | <p>Microsoft Bing LinkedIn</p> | |
| | <u>Measure 22.4</u> | | <p>This measure is aimed specifically at “providers of trustworthiness indicators” and is therefore not relevant or pertinent to Microsoft and its services.</p> |
| | <u>Measure 22.5</u> | | <p>This measure is aimed specifically at “providers of trustworthiness indicators” and is therefore not relevant or pertinent to Microsoft and its services.</p> |
| | <u>Measure 22.6</u> | | <p>This measure is aimed specifically at “providers of trustworthiness indicators” and is therefore</p> |

| | | | |
|---|---------------------|----------------------------|--|
| | | | not relevant or pertinent to Microsoft and its services. |
| | <u>Measure 22.7</u> | Microsoft Bing LinkedIn | |
| Reason for <i>not subscribing</i> to Commitment 22 (if applicable): | | | |
| <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> | Microsoft Bing LinkedIn | |
| | <u>Measure 23.2</u> | Microsoft Bing LinkedIn | |
| Reason for <i>not subscribing</i> to Commitment 23 (if applicable): | | | |
| <u>Commitment 24</u> 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 | <u>Measure 24.1</u> | LinkedIn | |

| | | | |
|--|----------------------------|--|--|
| <p>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>Reason for <i>not subscribing</i> to Commitment 24 (if applicable):</p> <p>Commitment 24 is not relevant or pertinent to Microsoft Bing as it does not allow the posting of user content that would require user appeals.</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><u>Measure 25.2</u></p> | | |
| <p>Reason for <i>not subscribing</i> to Commitment 25 (if applicable):</p> <p>Commitment 25 is not relevant to Microsoft Bing and LinkedIn.</p> | | | |

VI. Empowering the Research Community

| <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> | 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> | Microsoft Bing LinkedIn | |
| | <u>Measure 26.2</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 26.3</u> | Microsoft Bing LinkedIn | |
| Reasons for <i>not subscribing</i> to Commitment 26 (if applicable): | | | |
| <u>Commitment 27</u> | <u>Measure 27.1</u> | Microsoft Bing | |

| | | | |
|---|---------------------|----------------------------|--|
| 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 | | LinkedIn | |
| | <u>Measure 27.2</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 27.3</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 27.4</u> | Microsoft Bing LinkedIn | |
| Reason for <i>not subscribing to Commitment 27</i> (if applicable): | | | |
| <u>Commitment 28</u> Relevant Signatories commit to support good faith research into Disinformation that involve their services | <u>Measure 28.1</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 28.2</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 28.3</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 28.4</u> | Microsoft Bing | |

| | | | |
|---|---------------------|----------|--|
| | | LinkedIn | |
| 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 standards, as well as to share datasets, research findings and methodologies with relevant audiences | <u>Measure 29.1</u> | | |
| | <u>Measure 29.2</u> | | |
| | <u>Measure 29.3</u> | | |
| Reason for <i>not subscribing to Commitment 29</i> (if applicable): | | | |
| Commitment 29 is aimed specifically at the research community and is therefore not relevant or pertinent to Microsoft and its services. | | | |

VII. Empowering the Fact-checking Community

| <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"> • <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 30</u></p> <p>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.</p> | <p><u>Measure 30.1</u></p> | <p>Microsoft Bing LinkedIn</p> | |
| | <p><u>Measure 30.2</u></p> | <p>Microsoft Bing LinkedIn</p> | |
| | <p><u>Measure 30.3</u></p> | <p>Microsoft Bing LinkedIn</p> | |
| | <p><u>Measure 30.4</u></p> | <p>Microsoft Bing LinkedIn</p> | |
| <p>Reasons for <i>not subscribing to Commitment 30</i> (if applicable):</p> | | | |

| | | | |
|---|---------------------|----------------------------|---|
| | | | |
| <u>Commitment 31</u> 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 31.1</u> | LinkedIn | This Measure is not relevant or pertinent to Microsoft Bing as it does not showcase User Generated Content. |
| | <u>Measure 31.2</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 31.3</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 31.4</u> | Microsoft Bing LinkedIn | |
| Reason for <i>not subscribing</i> to Commitment 31 (if applicable): | | | |
| <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 | <u>Measure 32.1</u> | Microsoft Bing LinkedIn | |
| | <u>Measure 32.2</u> | LinkedIn | This Measure is not relevant to Microsoft Bing as it does not showcase User Generated Content. |
| | <u>Measure 32.3</u> | Microsoft Bing | |

| | | | |
|---|---------------------|----------|--|
| representative of the independent European fact-checking organisations. | | LinkedIn | |
| Reason for <i>not subscribing</i> to Commitment 32 (if applicable): | | | |
| <u>Commitment 33</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. | <u>Measure 33.1</u> | | |
| Reason for <i>not subscribing</i> to Commitment 33 (if applicable): Commitment 33 is aimed specifically at fact-checking organisations and therefore not relevant or pertinent to Microsoft and its services. | | | |

VIII. Transparency Centre

| <u>List of adopted commitments and measures</u> | | <u>Subscribed</u> (including indication about which of the signatory's services are subscribed to) | 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 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 34.1</u> | Microsoft | |
| | <u>Measure 34.2</u> | Microsoft | |
| | <u>Measure 34.3</u> | Microsoft | |
| | <u>Measure 34.4</u> | Microsoft | |
| | <u>Measure 34.5</u> | Microsoft | |
| Reasons for <i>not subscribing</i> to Commitment 34 (if applicable): | | | |
| <u>Commitment 35</u> | <u>Measure 35.1</u> | Microsoft | |

| | | | |
|---|---------------------|-----------|--|
| 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> | Microsoft | |
| | <u>Measure 35.3</u> | Microsoft | |
| | <u>Measure 35.4</u> | Microsoft | |
| | <u>Measure 35.5</u> | Microsoft | |
| | <u>Measure 35.6</u> | Microsoft | |
| 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> | Microsoft | |
| | <u>Measure 36.2</u> | Microsoft | |
| | <u>Measure 36.3</u> | Microsoft | |
| Reason for <i>not subscribing to Commitment 36</i> (if applicable): | | | |

| IX. Task-force | | | |
|--|---------------------|---|--|
| <u>List of adopted commitments and measures</u> | | <u>Subscribed</u> (including indication about which of the signatory's services are subscribed to) | 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 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 Taskforce are made by consensus. | <u>Measure 37.1</u> | Microsoft | |
| | <u>Measure 37.2</u> | Microsoft | |
| | <u>Measure 37.3</u> | Microsoft | |
| | <u>Measure 37.4</u> | Microsoft | |
| | <u>Measure 37.5</u> | Microsoft | |
| | <u>Measure 37.6</u> | Microsoft | |
| Reasons for <i>not subscribing</i> to Commitment 37 (if applicable): | | | |

| X. Monitoring Framework | | |
|---|--|--|
| <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> | 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] |
| <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. | Microsoft | |
| Reasons for <i>not subscribing to Commitment 38</i> (if applicable): | | |
| <u>Commitment 39</u> Signatories commit to provide to the European Commission, within 1 month after the end of the implementation period (6 | Microsoft | |

| | | | |
|--|----------------------------|------------------|--|
| <p>months after this Code’s signature) the baseline reports as set out in the Preamble.</p> | | | |
| <p>Reasons for <i>not subscribing to Commitment 39</i> (if applicable):</p> | | | |
| <p><u>Commitment 40</u></p> <p>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>Microsoft</p> | |
| | <p><u>Measure 40.2</u></p> | <p>Microsoft</p> | |
| | <p><u>Measure 40.3</u></p> | <p>Microsoft</p> | |
| | <p><u>Measure 40.4</u></p> | <p>Microsoft</p> | |
| | <p><u>Measure 40.5</u></p> | <p>Microsoft</p> | |
| | <p><u>Measure 40.6</u></p> | <p>Microsoft</p> | |
| <p>Reason for <i>not subscribing to Commitment 40</i> (if applicable):</p> | | | |
| <p><u>Commitment 41</u></p> | <p><u>Measure 41.1</u></p> | <p>Microsoft</p> | |

| | | | |
|--|----------------------------|------------------|--|
| <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> | <p><u>Measure 41.2</u></p> | <p>Microsoft</p> | |
| | <p><u>Measure 41.3</u></p> | <p>Microsoft</p> | |
| <p>Reason for <i>not subscribing</i> to Commitment 41 (if applicable):</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>Microsoft</p> | | |
| <p>Reason for <i>not subscribing</i> to Commitment 42 (if applicable):</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>Microsoft</p> |
| <p>Reason for <i>not subscribing to Commitment 43</i> (if applicable):</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>Microsoft</p> |
| <p>Reason for <i>not subscribing to Commitment 44</i> (if applicable):</p> | |

Signature

Date and place

A handwritten signature in black ink, appearing to read 'Casper Klynge', with a long horizontal line extending to the right.

Brussels, 14.06.202

Casper Klynge

Vice President European Government Affairs

Microsoft Corporation