

EU CODE OF PRACTICE ON DISINFORMATION 2022

## Subscription Document for Signatory

*Alliance4Europe gGmbH*

**Name of the Signatory:** Alliance4Europe gGmbH

**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.]***

Alliance4Europe is a non-profit bringing together pro-European and pro-democratic actors, to promote and advance democracy and fundamental values in Europe. A4E promotes civic engagement through cooperation among civil society organizations, academia, the creative industries, the arts, and private sector A4E provides its network with tools, analysis on disinformation, and creates campaigns for citizen engagement and social impact.

***Depending on the type of signatory, describe also either the nature and specificities of the platform/service and the types of disinformation-related issues observed on the service (for online platform signatories), or the solutions or activities provided by the signatory to counter disinformation (for other type of signatories)]***

A4E supports the development of tools and approaches to foster cooperation against disinformation. Our coordination work aims to increase capacity, resources, and collaboration among those defending against disinformation. A4E has been a leading partner in the development of the DISARM Framework (formerly known as AMITT - as in Measure 14.1) of disinformation tactics, techniques, and procedures. A4E aims to foster cooperation, coordination, and exchange among a broad range of stakeholders to strengthen a digital space that enables democracy. A4E conducts research on an ad hoc basis, and will share information, research, best practices where possible and relevant.

*If you are a trade association, provide information about your membership and any other relevant information.]*

Service name	Description of the service

<b>III. Political Advertising</b>		
<b>List of adopted commitments and measures <sup>1</sup></b>		<b>Qualitative reporting elements and service level indicators<sup>2</sup></b>
Commitment 12 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.	Measure 12.1 Relevant Signatories will work to research, monitor and report on the use of online political or issue advertising across Member States.	<u>QRE 12.1.1</u>
	Measure 12.3 Relevant Signatories will alert fellow Signatories to issues in the implementation or enforcement of political or issue advertising policies or of this Code	<u>QRE 12.1.1</u>
Commitment 13 Relevant Signatories agree to engage in ongoing monitoring and research to understand and respond to risks related to	Measure 13.1 Relevant Signatories agree to work individually and together through the Task-force to identify novel and evolving disinformation risks in the uses of political or issue advertising and discuss options for addressing those risks.	QRE 13.1.1 Through the Task-force, the Relevant Signatories will convene, at least annually, an appropriately resourced discussion around: novel risks in political

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

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

Disinformation in political or issue advertising.	Measure 13.2 Relevant Signatories will consult with the Task-force and other relevant stakeholders to assess the opportunity and impact of short election “blackout periods” for political or issue advertising on their services in all Member States.	advertising to develop coordinated policy
	Measure 13.3 Relevant Signatories agree to evaluate, together with the Task-force, whether there is sufficient independent scrutiny of political or issue advertising in Member States.	QRE 13.3.1 Independent scrutiny of political or issue advertising.

<b>IV. Integrity of Services</b>		
<b>List of adopted commitments and measures <sup>3</sup></b>		<b>Qualitative reporting elements and service level indicators<sup>4</sup></b>
<i>Commitment 14: Engage with and support relevant signatories in successfully delivering on the commitment to reduce manipulative behaviours on digital media, and facilitate analysis and information sharing relevant to the commitment.</i>		
	<i>Measure 14.3 Relevant Signatories will convene via the Permanent Task-force to agree upon and publish a list and terminology of TTPs employed by malicious actors, which should be updated on an annual basis, and consist in a</i>	<i>Participate and support the work of relevant Signatories in the subgroup periodically reviewing the list of TTPs</i>

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

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

	<i>shared understanding of manipulative behaviours and practices not permitted on their service to-date.</i>	
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<b>VIII. Transparency Centre</b>		
<b>List of adopted commitments and measures <sup>5</sup></b>		<b>Qualitative reporting elements and service level indicators<sup>6</sup></b>
Commitment 34	Measure 34.3 Relevant Signatories will contribute to the Transparency Centre’s information to the extent that the Code is applicable to their services	

<b>IX. Permanent Task-force</b>		
<b>List of adopted commitments and measures <sup>7</sup></b>		<b>Qualitative reporting elements and service level indicators<sup>8</sup></b>
Commitment 37	Measure 37.1 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	<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.

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

<sup>6</sup> Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate

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

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

	<p>their resources together and represent each other in the Taskforce. 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</p>	
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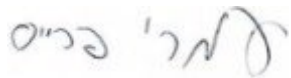
<b>X. Monitoring</b>		
<b>List of adopted commitments and measures <sup>9</sup></b>		<b>Qualitative reporting elements and service level indicators <sup>10</sup></b>
<p>Commitment 39 Signatories commit to provide to the European Commission, within 1 month after the end of the implementation period (6 months after this Code's signature) the baseline reports as set out in the Preamble</p>		
<p>Commitment 40 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</p>	<p>Measure 40.2 Other Signatories will report yearly on the implementation of the Commitments and Measures taken under the present Code, including on the relevant QREs and SLIs, at service and Member State level.</p>	

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

<sup>10</sup> *Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate*

Measures by each Signatory, service and at Member State level		
<p><b>Provide reasoning for the choice of commitments and measures, as well as future plans</b> (if applicable)</p> <p><i>[Provide narrative description of what circumstances and proportionality considerations guide the signatory's choice on the commitments and measures signing up to, including – where relevant - a general reasoning why the other commitments and measures of the chapter have not been signed (yet) (i.e. not appropriate/proportionate). Where applicable, give an indication of which commitments/measures might be under the service's consideration for signature in the future.]</i></p> <p><b>As a non-profit working to protect and advance European democracy, A4E commits to participating in discussions with Signatories on research and monitoring of disinformation, on identifying novel disinformation risks, and engaging with Signatories to ensure enforcement, and formulate solutions. Where relevant and possible, A4E may share research it is carrying out, but it cannot commit to doing so in advance given that its research is conducted on an ad hoc basis. Nevertheless, A4E will take relevant possible opportunities to share research and analysis with Signatories.</b></p>		

Signature



Omri Preiss,  
 Managing Director,  
 Alliance4Europe

Date and place  
 22/11/2022, Brussels