



EU CODE OF PRACTICE ON DISINFORMATION 2022

Subscription Document for Signatory IAB Europe





Name of the Signatory

IAB Europe (INTERACTIVE ADVERTISING BUREAU EUROPE A.I.S.B.L.)¹

About the Signatory

IAB Europe (Transparency Register: 43167137250-27) is the European-level association that represents the broad digital advertising and marketing ecosystem, with 25 national associations whose 5000+ members include advertisers, agencies, publishers, and technology companies. We work with over 90 companies in our direct membership. Through its membership of National IABs and media, technology and marketing companies, its mission is to lead political representation and promote industry collaboration to deliver frameworks, standards and industry programmes that enable business to thrive in the European market.

IAB Europe recognises the challenge of disinformation, and believes that in this context, it is in our shared interest to ensure that the digital ecosystem continues to provide accurate information and views, and on terms that are accessible and affordable for all citizens. The Association and a number of its member companies were signatories to the EU Code of Practice (CoP) on Disinformation in 2018, being committed to actionable commitments in their respective fields of activity. IAB Europe also engaged in the revision process that resulted in producing the strengthened CoP, unveiled in June 2022.

II. Scrutiny of Ad Placement

List of adopted commitments and measures ²

Qualitative reporting elements and service level indicators³

¹ *The Signatories recognise that trade associations which have signed this Code are not entering into obligations due to their nature on behalf of their members. However, these associations commit to make their members fully aware of this Code and encourage them to join it or respect its principles, as appropriate.*

² *Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate*

³ *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>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</p>	<p><u>Measure 1.1.</u> Relevant Signatories will set up a working group and work on developing a methodology to report on demonetisation efforts, including data related to the volume of advertising that support Disinformation sources, while taking account of legal constraints related to financial reporting and methodological challenges, and present a recommendation to the Task-force within 6 months, to include an additional SLI for the baseline reports. The SLI should provide insight into the impact of actions taken by relevant Signatories at the service and the Member State levels.</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 epayment 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> 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> Signatories will report on their discussions within fora mentioned in Measure 3.2, being mindful of not disclosing information that is confidential and/or that may be used by malicious actors to circumvent the defences set by Signatories and others across the advertising supply chain. This could include, for instance, information about the fora Signatories engaged in; about the kinds of information they shared; and about the learnings they derived from these exchanges.</p>





<p>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)</p> <p>IAB Europe in its role as a trade association for the digital advertising ecosystem will subscribe to Commitment 1 and to Measure 1.1. taking part of the working group set with the aim of developing a methodology to report on demonetisation efforts.</p> <p>Part of the IAB Europe’s mission is to promote industry collaboration and share best practice. The Association can indeed be a relevant forum to facilitate exchanges amongst market players, building on existing discussions with members, including, related to brand safety, transparency and quality.</p>		

III. Political Advertising		
List of adopted commitments and measures ⁴		Qualitative reporting elements and service level indicators ⁵
<p><u>Commitment 4</u> Commitment 4. Relevant Signatories commit to adopt a common definition of “political and issue advertising”</p>	<p><u>Measure 4.2.</u> Measure 4.2. Should there be no political agreement on the definition of “political advertising” in the context of the negotiations on the European Commission’s proposal for a Regulation on the transparency and targeting of political advertising within the first year of the Code’s operation or</p>	<p>QRE 4.1.2: (for Measures 4.1 and 4.2) After the first year of the Code’s operation, Relevant Signatories will state whether they assess that further work with the Task-force is necessary and the mechanism for doing so, in line with Measure 4.2.</p>

⁴ Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

⁵ 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>should this Regulation not include a definition of “political advertising” which adequately covers “issue advertising” (as assessed in the Task-force under QRE 4.1.1), the Signatories will come together with the Task-force to establish working definitions of political advertising and issue advertising that can serve as baseline for this chapter.</p>	
<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.</p>	<p><u>Measure 13.1.</u> 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.</p>	<p><u>QRE 13.1.1 (for Measures 13.1-13.3):</u> Through the Task-force, the Relevant Signatories will convene, at least annually, an appropriately resourced discussion around: - novel risks in political advertising to develop coordinated policy - ongoing discussions on blackout periods - independent scrutiny of political or issue advertising.</p>
	<p><u>Measure 13.2.</u> 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.</p>	
	<p><u>Measure 13.3.</u> Relevant Signatories agree to evaluate, together with the Task-force, whether there is sufficient independent scrutiny of political or issue advertising in Member States.</p>	

VI. Transparency Centre





List of adopted commitments and measures ⁶		Qualitative reporting elements and service level indicators ⁷
<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>Commitment 35.</u> 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 35.3.</u> Signatories ensure that the Transparency Centre contains a repository of their reports assessing the implementation of the Code’s commitments.	
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)		
IAB Europe in its role as a trade association will support the work of the Transparency Centre and will take part in the activities described in this section to the extent that they are relevant for the digital advertising and marketing ecosystem, and proportionate to the nature of IAB Europe.		

⁶ Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

⁷ 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 ⁸		Qualitative reporting elements and service level indicators⁹
<p><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 systems, with the aim to increase the effectiveness of scrutiny of ad placements on their own services.</p>	<p><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.</p>	
	<p><u>Measure 37.2.</u> 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"> - Agree on the harmonised reporting templates for the implementation of the Code’s Commitments and Measures, the refined methodology of the 	

⁸ Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate

⁹ 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>reporting, and the relevant data disclosure for monitoring purposes.</p> <ul style="list-style-type: none">- 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.- 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.- 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.- Promote the Code among relevant peers and integrate new Signatories to the Code.	
	<p><u>Measure 37.3.</u> 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</p>	





	with the Signatories and agreed on by consensus between the members of the Task-force.	
	<u>Measure 37.4.</u> 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.	
	<u>Measure 37.5.</u> When needed, and in any event at least once per year the Task-force organises meetings with relevant stakeholder groups and experts to inform them about the operation of the Code and gather their views related to important developments in the field of Disinformation.	
	<u>Measure 37.6.</u> 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	<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.
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable)		
IAB Europe in its role as a trade association will be part of the Task-force and will take part in the activities described in this section that are relevant for the digital advertising and marketing ecosystem, and proportionate to the nature of IAB Europe.		





--

X. Monitoring of the Code		
List of adopted commitments and measures ¹⁰		Qualitative reporting elements and service level indicators¹¹
<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.		
<u>Commitment 40.</u> Signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data	<u>Measure 40.2.</u> 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.	

¹⁰ *Text of the commitments/measures as per Code of Practice or adapted to be more relevant or proportionate*

¹¹ *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>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> Signatories will develop, within the Task-force, harmonised reporting templates.</p>	
	<p><u>Measure 40.5.</u> 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> 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>	
<p><u>Commitment 41.</u> 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</p>	<p><u>Measure 41.1.</u> 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</p>	





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.	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.	
	<u>Measure 41.2.</u> 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 present on progress thus far and seek feedback.	
	<u>Measure 41.3.</u> 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.	
<u>Commitment 42.</u> 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 Taskforce		
<u>Commitment 43.</u> 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		
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable) IAB Europe in its role as a trade association will contribute to the commitments described in the Monitoring section that are relevant to the digital advertising and marketing ecosystem, and proportionate to the nature of IAB Europe.		





[Empty rectangular box for signature or stamp]

Signature

Date and place

Townsend Feehan
IAB Europe's CEO

15 June, Brussels, Belgium

