EC ACTION PLAN ON DISINFORMATION

GOOGLE APRIL 2019 REPORT

This document comprises Google's fourth monthly report in response to the European Commission's Action Plan on disinformation, mapping out progress towards the implementation of the Code of Practice on Disinformation. It covers our updates and actions for the month of April 2019 and builds on our March 2019 report (Annex I), February 2019 monthly report (Annex II), January 2019 monthly report (Annex III), and the initial 2018 baseline report on the CoP commitments (Annex IV), which we previously submitted to the European Commission.

In the April report we highlight the latest progress on our efforts to require **verification and disclosure for election ads** in the European Union Parliamentary elections and present the recently launched **EU Political Ads Transparency Report**. Similarly to previous monthly reports, we also provide **information about how we enforce ads policies** in all EU member states and **numbers of YouTube channels we removed for violation of certain policies**. Finally, we present April updates on our **work with the EU elections candidates** and **updates on our cooperation with fact-checkers, journalists, and researchers** and **launches of elections products for voters**.

We look forward to continuing to cooperate with the European Commission as part of this process, and take very seriously the responsibility of ensuring that we do our part to tackle online disinformation in Europe.

Over the course of April, we have continued to work towards implementing and enforcing the commitments we made in the Code of Practice on Disinformation.

1) ADVERTISING:

Continuing to protect our users from the behaviors of malicious actors
As a reminder, Google's policies to tackle disinformation on our advertising platforms focus on misrepresentative or harmful behavior by advertisers or publishers while avoiding judgments on the veracity of statements made about politics or current events. This means that there are a number of policies designed to catch bad behaviors that are used to deceive our users. While these tactics are sometimes associated with disinformation campaigns, they are also commonly used by other bad actors engaged in other malicious activity.

Misrepresentation in Google Ads and the websites they point to

We don't want users to feel misled by ads, so we strive to ensure that the ads that are created and distributed using our systems ['Google Ads'] are clear and honest, and provide the information that users need to make informed decisions. Our policy against misrepresentation does not allow ads or ad destinations that intend to deceive users by excluding relevant information or giving misleading information about products, services, or businesses. This policy is used to cover a wide range of misrepresentative claims in our enforcement. For example, an ad directing traffic to a site that lies about its credentials or impersonates the brand or logo of a political party or news organization could be removed for violating this policy. We would also apply that same policy to a business running ads that falsely claimed to be a licensed plumber in order to drive traffic to their site. This approach makes it possible for us to enforce our policies at a broader scale and to automate some of the detection of abusive behaviors.

Our policies against misrepresentation also prohibit falsely implying affiliation with, or endorsement by, another individual, organization, product, or service. This includes the misleading use or mimicry of official government sites, stamps, seals, or agency names. A specific example is when an advertiser mimics the layout and design of an official government agency site but is not actually a government agency. Such behaviour would violate our misrepresentation policies and we would take appropriate action, such as removing the ads or terminating the account.

We detected 35,428 EU-based Google Ads accounts in violation of our misrepresentation policies in April 2019. These ads attempted to reach users on Google properties, like Search and YouTube, as well as on third party properties where publishers elect to display Google Ads to monetize their websites.

A country-by-country breakdown of the violations of this misrepresentation policy is available below. Each of these accounts has engaged in at least one of the deceptive behaviors prohibited by our misrepresentation policies as part of the advertising campaigns they created using billing information from one of the EU28 countries -- for instance, by concealing or making false statements about the identity or qualifications of the advertiser. By taking action on these accounts, we were able to prevent advertisers from using our platform in ways that deceive users, including in ways associated with disinformation campaigns.

As per our usual process, policy-violating content associated with those accounts was disapproved, meaning that we blocked ads from serving to users. In some egregious cases, advertiser accounts were disabled. Note that not all misrepresentation violations are associated with disinformation campaigns. This policy is meant to protect users from being misled by the content they see from advertisers and publishers. Additionally, abuse patterns differ from product to product, so we advise the reader to refer to the respective policies to see more information about the content we enforce on.

Google Ads accounts with Misrepresentation violations (by billing country):

EU member Countries	Google Ads accounts with Misrepresentation violations (by billing country)
AT	156
BE	176
BG	212
CY	130
CZ	508
DE	11295
DK	669
EE	396
ES	1614
FI	206
FR	2404
GB	2637
GR	349
HR	168
HU	554
IE	153
IT	10057
LT	126
LU	24
LV	78
MT	102
NL	1150
PL	1088
PT	238
RO	506
SE	183
SI	128
SK	121
Total	**35,428**

Misrepresentation by publishers using AdSense

We launched AdSense in 2003 to help publishers fund their content by placing ads on their website. Over time, it has become a core part of our advertising products, serving more than two million website owners around the world.

In addition to combating misrepresentative ads (as described in the previous section), we strive to ensure that AdSense does not enable the monetization of misrepresentative websites. That's why our AdSense policies mandate that ads may not be placed on pages that misrepresent, misstate, or conceal information about the website's publisher, their primary purpose, or the web property they operate. An example of such misleading behaviour is directing content about politics, social issues, or matters of public concern to users in a country other than the publisher's if they misrepresent or conceal their country of origin or other material details about themselves.

We found 2 AdSense publishers with EU payment information in violation of our misrepresentative content policies in the monitored period. One was from Estonia and the other was from Finland. Keep in mind that much of the content on AdSense that we would classify as disinformation content is taken down under other policies, like unoriginal content as reported below. Because our systems optimize for the timeliness and effectiveness of enforcement, we do not verify whether an AdSense account we took action against for unoriginal content would also have infringed upon other policies, including our misrepresentative content policy. Empirically, though, we have noted that many malicious actors engage in a multiplicity of harmful behaviors -- making it likely that many of the websites we take action against under one policy were also problematic under others, notably including misrepresentation.

Insufficient original content

We also continue to monitor for and take action on content that is insufficiently original and provides no value to users. This is relevant to the purposes of this report because while this behavioral pattern is not exclusive to propagators of disinformation, we have observed that a number of them do use it in order to increase the magnitude of content available on their website and give the impression that their operations are bigger or more legitimate than they are in reality. In Google Ads, this set of behaviors falls under our policy on "insufficient original content"; on AdSense, and similar behaviors are covered by our "valuable inventory" policy -- these different names and framings reflect the fact that one of these policies is about the content that an ad leads to, while the other is about the websites where ads are displayed.

We detected and took action on 6,696 EU-based Google Ads accounts in violation of our policy on insufficient original content. Additionally, we detected and took site- or account-level action on 310 EU-based AdSense publishers who were trying to serve ads on non-valuable inventory on their site. Breakdowns by countries are available below.

These policies prevent driving traffic to, or the monetization of, websites that provide little or no value to users or that have excessive advertising. In the context of disinformation, this helps address low quality content that is copied over many different sites in an attempt to spread the message more widely. Specifically, these policies cover a wide range of behaviors, including sites that:

- Have more ads than content or no content at all
- Copy or replicate content from other sites without adding any additional content or functionality, including the use of mirroring (sites with identical or near-identical content as another site), framing (making content from a site viewable directly on another site), or scraping (automatically copying content from another site via methods like bots or web crawlers)
- Automatically generate content without manual review or curation

As per our usual process under both Google Ads and AdSense policies, policy-violating content associated with those accounts was demonetized -- meaning that we stopped serving violating ads, and removed advertising from violating sites.

We also take action on individual pages that violate our AdSense policy, though those actions are not reflected in this report. As is the case for misrepresentative content, not all of these policy violations are associated with disinformation campaigns, but our policies are devised to make sure that we are are not monetizing harmful content.

As abuse patterns differ from product to product, readers should refer to the descriptions of specific policies for a more granular understanding of the content and behaviors we take action against.

A country-by-country breakdown is available below. Each of these accounts has attempted to drive traffic to or make money from copied or replicated content in at least one of the ways mentioned above as part of the advertising campaigns they created using billing information from one of the EU28 countries. By taking action on these accounts, we were able to prevent advertisers from using our platform in ways that spread low quality information widely across the web, including in ways associated with disinformation campaigns.

Google Ads accounts with Insufficient Original Content violations (by billing country):

EU member countries	Google Ads accounts with Insufficient Original Content violations (by billing country)
AT	86
BE	67
BG	67
CY	137
CZ	85
DE	1016

DK	73
EE	12
ES	507
FI	30
FR	619
GB	1985
GR	96
HR	29
HU	68
IE	150
IT	456
LT	28
LU	44
LV	21
MT	21
NL	374
PL	421
PT	111
RO	98
SE	70
SI	10
SK	15
Total	**6,696**

AdSense accounts with Valuable Inventory violations (by payment country)

EU member countries	AdSense accounts with Valuable Inventory violations (by payment country)
AT	1
BG	3
CY	2
CZ	6
DE	99
ES	12
FI	1
FR	9

GB	118
GR	1
HR	3
HU	1
IT	10
LT	7
LV	1
NL	5
PT	12
RO	11
SE	7
SK	1
TOTAL	**310**

2) POLITICAL ADVERTISING:

We continue to make progress on our efforts to require verification and disclosure for election ads in the European Union Parliamentary elections. Advertisers that want to run ads that reference a political party, candidate, or current office holder are required to be verified by Google. For some ad formats, Google adds a built-in disclaimer based on the advertiser's verification information. For other ad formats, the advertiser is responsible for incorporating the disclaimer into the ad on their own.

The relevant policy was published in our policy help center in January. In February we launched more details as to the specific verification requirements that advertisers will need to meet in order to run election ads. Applications for verification opened on March 14, 2019, and we started enforcing our policy for election ads in the EU on March 21, 2019. In-ad disclosures of who paid for these election ads began to show in late March. Prospective advertisers are required to go through a two-step verification process to prove that they are eligible to advertise in these elections, to take place as follows:

> **Two-step verification process**:
> ***Step one*** will verify the advertiser's eligibility to run election ads by providing the following information:
> - Google Ads Customer ID
> - Email address
> - Country the organization is registered in
> - Name of the organization
> - Document confirming organization name

- Official address
- Document showing proof of address
- Attestation that the authorized representative is a citizen of an EU member state
- Attestation that the organization applying for verification is based in an EU member state
- Agreement to the Google Election Ads terms

Step two will verify the advertiser's identity by providing the following information:
- Organization name
- Organization address
- Document showing proof of address
- Registration document or number for the organization
- Authorized representative name
- Authorized representative address
- A copy of the authorized representative's government issued photo ID
- Attestation that the authorized representative is a citizen of an EU member state
- Attestation that the organization applying for verification is based in an EU member state
- Agreement to the Google Election Ads terms

We have clearly communicated this in our political content policy and verification requirements. On top of that, our local Google teams have been trained on this process in order to be able to respond to questions from the political parties and institutions responsible for the elections. We are also explaining this process during our elections trainings for political parties and candidates.

In the month of April, we received 556 verification applications and successfully verified 123 advertisers to run election ads in the EU Parliamentary elections. Of those applications that were not verified, 13 are pending further review by our team, while 420 were rejected. Many of those applications are legitimate advertisers who were rejected for failing to provide the appropriate documents; we are working to assist them in navigating the verification process. We have also identified and labelled more than 56,968 election ad creatives in our system from verified advertisers (note that advertisers do not run every ad they create). Of those ads labelled, 10,289 were shown to users in April. These ads featured the required paid-for-by disclosure and are included in Google's Transparency Report. Additionally, we have prevented more than 16,195 election ads from being served where there was not proper verification of the advertiser.

We have also launched a transparency report on EU Political Advertising on Google to show voters who is purchasing election ads on Google in the 2019 EU parliamentary election and how much money is being spent. This report includes a searchable ad library that provides valuable data such as which ad had the highest impressions, what the latest election ads

running on the Google platform are, and how the ads are targeted in terms of age, gender, and location. We also published a blogpost describing the transparency report.

Anyone can access and use this information, and we have taken steps to ensure that people can easily sort through the data. The report is searchable and downloadable to help researchers analyze this data more effectively, and has options to filter by spend, number of impressions, and type of ad format. The report is updated weekly and will display verified election ads that have one or more impression.

As with our U.S. and India election advertising Transparency Reports, the data from the EU election advertising Transparency Report and Ad Library will be available for anyone with an interest in transparency on Google Cloud's BigQuery. Using BigQuery's API, researchers, political watchdogs and private citizens can write code and run their own unique queries on this data set to develop charts, graphs, tables or other visualizations of election advertising on Google platforms.

Political advertising in the European Union

Our goal is to provide greater transparency in political advertising on Google, YouTube, and partner properties. This report includes information about ads that feature a political party, or a current elected officeholder or candidate for the EU Parliament.
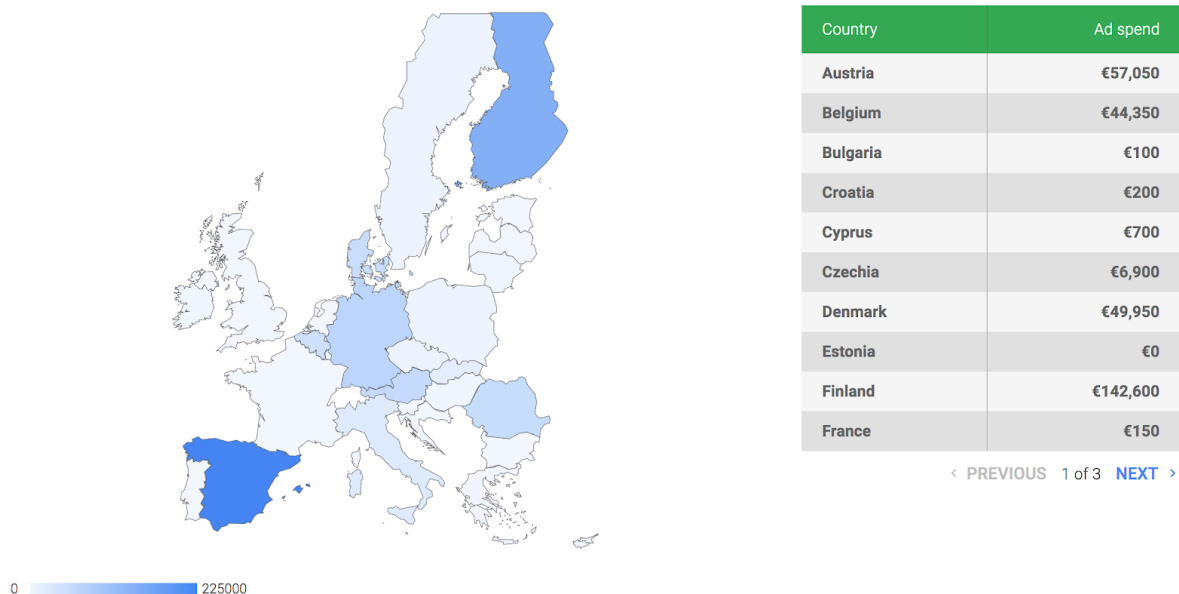
Ads since Mar 21, 2019

11,746

Ad spend since Mar 21, 2019

€706,550

The homepage of the EU Political Advertising on Google Transparency Report, as seen on May 7, 2019

Ad spend per geography

Country	Ad spend
Austria	€57,050
Belgium	€44,350
Bulgaria	€100
Croatia	€200
Cyprus	€700
Czechia	€6,900
Denmark	€49,950
Estonia	€0
Finland	€142,600
France	€150

‹ PREVIOUS   1 of 3   NEXT ›

0 ▭▭▭▭ 225000

A snapshot of ad spend by geography in the EU Political Advertising on Google Transparency Report, as seen on May 7, 2019

We are continuing to research and consult with experts to find workable solutions that may provide transparency around political issue advertising (i.e., political ads that do not feature candidates or office holders). Due to the difficult nature of identifying issue ads and the technical requirements for implementing any such solution, we do not expect to have reached a resolution before the end of May. We will inform the Commission of any progress made in upcoming reports.

3) INTEGRITY OF SERVICES:

For YouTube, since its founding, there have been attempts to game or manipulate our systems. The techniques that aim to evade our detection have and will continue to evolve. It is business critical to continue to secure the integrity of our services and maintain the trust of our users. For well over a decade, YouTube has built, deployed and invested in proprietary technology to protect against such attempts.

- *Breaking News on YouTube*: On YouTube, we have worked to launch several product features that prominently surface news content from only authoritative sources. The Breaking News shelf triggers when there is a significant news event happening in a specific country. This shelf triggers automatically and is shown prominently on the YouTube homepage to all users in the country. Similar to the Top News shelf, only content from authoritative sources is eligible to be surfaced in the Breaking News shelf. In the EU today, these products are launched in the UK, Germany, France, Italy, Poland, Sweden, the Netherlands, Ireland, and Spain, with

more countries to be covered over the course of 2019. We will soon announce launching YouTube Breaking News in several new EU markets.

Breaking News Shelf on YouTube Homepage

During the month of April 2019, YouTube removed over 900,000 channels for violation of its spam, misleading, and scams policy, and more than 500 channels for violation of its impersonation policy. These statistics reflect channel removal enforcement actions under these policies on a global basis and across any type of content on YouTube. As described below, YouTube's impersonation policy applies to impersonation of channels, individuals, and organizations. We issue quarterly reports on the Community Guidelines enforcement efforts in our [Transparency Report](#).

YouTube Spam, Deceptive Practices, and Scams Policies (available [here](#)):

Examples of channels that would violate this policy include but are not limited to:
- A channel trying to abuse our search and recommendation algorithms by filling a video's title, description, or tags with terms or names (such as the names of celebrities) that are unrelated to the video.
- A channel making exaggerated promises, such as claims that users can get rich quickly or that a miracle treatment can cure chronic illness such as cancer.

This policy applies globally to videos, video descriptions, comments, live streams, and any other YouTube product or feature. Please note this is not a complete list.

YouTube Impersonation Policy (available here):

Examples of channels that would violate this policy include but are not limited to:
- A channel that copies another channel's profile, background, or overall look and feel in such a way that makes it look like someone else's channel.
- Content intended to look like someone else is posting it.
- Content or a channel that imitates someone's real name, user name, image, or other personal information to deceive people into thinking they are someone else on YouTube.

This policy applies globally to videos, video descriptions, comments, live streams, and any other YouTube product or feature. Please note this is not a complete list.

4) ELECTION ACTIVITY:

New trainings and initiatives to protect the integrity of European elections:
- *Trainings for journalists including to identify and tackle disinformation:* Since the start of the year, Google News Lab has provided 5,200 (April: 1,070) journalists across Europe with in-person training on a range of digital tools.
    - Since January, we've trained **3,600** (April: 400) journalists with specific digital verification skills in **27 EU countries**.

- With the IFCN, the News Lab has **launched** FactCheck EU **-** a collaborative fact-checking network that provides fact checks from 19 organisations from 10 countries and across 11 languages. Progress so far includes:
    - **67** articles, **155** translations published
    - Majority of content comes from organisations in **Spain, Italy, and France, with contributions from 7 other countries** (Lithuania, Croatia, Greece, UK, Ireland, Denmark, Sweden, Portugal).
    - Examples of published work: here

- News Lab has supported First Draft since 2015, and this year they're training journalists to use CrossCheck, a platform to help share knowledge across newsrooms. We hosted **4 events for fact checking journalists in Brussels (60), Frankfurt, Milan (80) and Madrid (40).** First Draft is now working with news organisations to collaborate on their own platform.

- *In-person trainings from Google experts for those involved in elections:* Google has continued in-person and online security trainings for those most at risk around the upcoming elections. For example, we offer a course on how to use our Advanced Protection Program, which gives Google's strongest security for those that need it most. So far we've trained 2,508 campaign and election officials, journalists and people from election-related NGOs in Europe in-person, so they can learn which security tools they need and how to use them. In April 2019, we organized 24 in-person training sessions for academics, practitioners, policy-makers and industry

representatives, focusing on the EU 2019 elections. Overall, we have had 494 participants in these trainings in April 2019. We have more trainings in the EU capitals planned in the coming weeks.

Participants in Google Trainings on Election Tools:

EU member countries	Participants in Google Trainings on Election Tools
AT	30
BE	1135
BG	23
DK	19
EE	9
ES	174
FI	77
FR	220
GE	225
GR	35
HR	100
HU	38
IE	13
LV	30
LT	50
MT	35
NL	77
PL	92
PT	65
RO	61
TOTAL	**2.508**

Totals represent all training by Google since November 2018. The numbers represent people trained directly in member states. Trainings in Belgium gather campaigners from multiple EU countries.

Media literacy programs:

Google continues to support media literacy programs across the EU. As mentioned previously, so far we have trained over 1 million people in person through our *Be Internet Citizens* and *Be Internet Awesome* across the EU. In the upcoming months we will announce new Google.org grants on media literacy across the EU.

Elections products

- **How to Vote** – We launched a new Search feature across all 28 countries (in the respective languages) that allows users to easily find information around how to vote (e.g. date of election, registration deadlines, documents to bring, absentee voting etc.). As the European Parliament's website howtovote.eu uses modern web standards, Google can ingest its content from directly and ensure comprehensiveness and correctness; changes in the original content can hence easily be reflected in the Google Search box. Google attributes the content to the European Parliament. https://www.european-elections.eu/
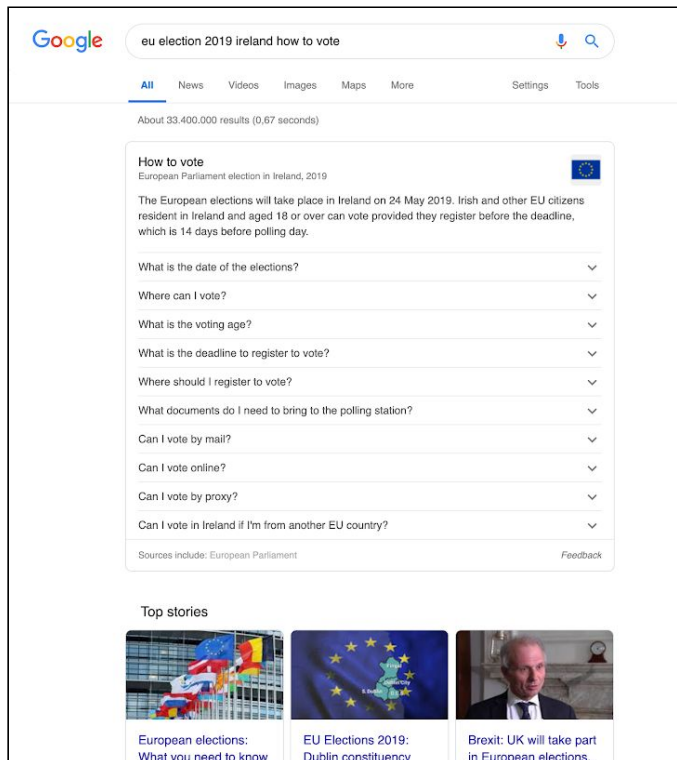
- **Candidate Statements** – Google enables infoboxes for all candidates who we know participate in the EU elections (the data is gathered in partnership with German news wire DPA); candidates can "claim" their infoxbox by going through a verification process and then submit statements (one platform statement with 500 characters, three top priorities with 140 characters each) that are displayed in the infobox to the user.

| Candidate infobox (truncated) | "Statement"-section in the candidate infobox |

- **Posts for Parties** – Google enables infoboxes for all parties that we know participate in the EU elections (data is gathered in partnership with German news wire DPA); once parties claimed their infobox and go through a verification process they can post updates (text, images, videos, URLs) to the infobox displayed to the users.

| Party infobox (truncated) | "Post"-section in the party infobox |

- **Posts for EU Parliament** – The same functionality that has been enabled for parties has also been enabled for the EU Parliament (link)

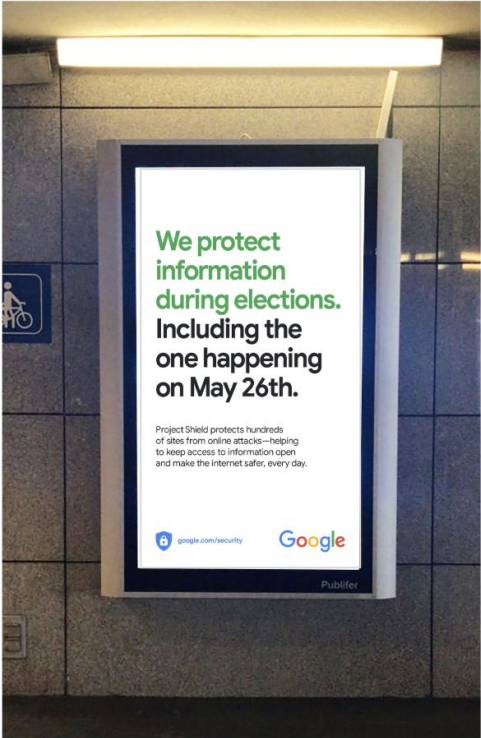**Information campaign in Brussels:**

As a part of our effort to raise awareness about online security and the elections, we continued the information campaign in Brussels throughout April 2019.
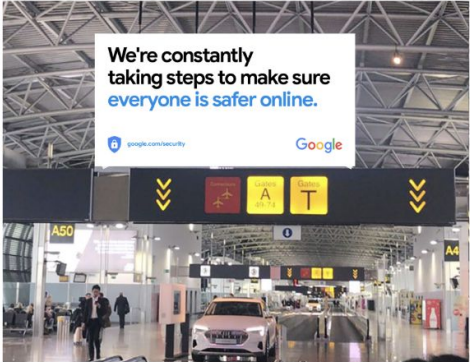
Brussels Airport - Departures

Screen in Eurostar train

Metro station EU district

Visualization of the information campaign in Brussels

ANNEX I - GOOGLE MARCH 2019 REPORT

Over the course of March, we have continued to work towards implementing and enforcing the commitments we made in the Code of Practice on Disinformation.

1) ADVERTISING:

Continuing to protect our users from the behaviors of malicious actors:
As a reminder, Google's policies to tackle disinformation on our advertising platforms focus on misrepresentative or harmful behavior by advertisers or publishers while avoiding judgments on the veracity of statements made about politics or current events. This means that there are a number of policies designed to catch bad behaviors that are used to deceive our users. While these tactics are sometimes associated with disinformation campaigns, they are also commonly used by other bad actors engaged in other malicious activity.

Misrepresentation in Google Ads and the websites they point to
We don't want users to feel misled by ads, so we strive to ensure that the ads that are created and distributed using our systems ['Google Ads'] are clear and honest, and provide the information that users need to make informed decisions. Our policy against misrepresentation does not allow ads or ad destinations that intend to deceive users by excluding relevant information or giving misleading information about products, services, or businesses. This policy is used to cover a wide range of misrepresentative claims in our enforcement. For example, an ad directing traffic to a site that lies about its credentials or impersonates the brand or logo of a political party or news organization could be removed for violating this policy. We would also apply that same policy to a business running ads that falsely claimed to be a licensed plumber in order to drive traffic to their site. This approach makes it possible for us to enforce our policies at a broader scale and to automate some of the detection of abusive behaviors.

Our policies against misrepresentation also prohibit falsely implying affiliation with, or endorsement by, another individual, organization, product, or service. This includes the misleading use or mimicry of official government sites, stamps, seals, or agency names. A specific example is when an advertiser mimics the layout and design of an official government agency site but is not actually a government agency. Such behaviour would violate our misrepresentation policies and we would take appropriate action, such as removing the ads or terminating the account.

We detected 10,234 EU-based Google Ads accounts in violation of our misrepresentation policies in March 2019. These ads attempted to reach users on Google properties, like Search and YouTube, as well as on third party properties where publishers elect to host Google Ads to monetize their websites.

A country-by-country breakdown of the violations of this misrepresentation policy is available below. Each of these accounts has engaged in at least one of the deceptive behaviors mentioned in our misrepresentation policies as part of the advertising campaigns they created using billing information from one of the EU28 countries -- for instance, by concealing or making false statements about the identity or qualifications of the advertiser. By taking action on these accounts, we were able to prevent advertisers from using our platform in ways that deceive users, including in ways associated with disinformation campaigns.

As per our usual process, policy-violating content associated with those accounts was disapproved, meaning that we blocked ads from serving to users. In some egregious cases, advertiser accounts were disabled. Note that not all misrepresentation violations are associated with disinformation campaigns. This policy is meant to protect users from being misled by the content they see from advertisers and publishers. Additionally, abuse patterns differ from product to product, so we advise the reader to refer to the respective policies to see more information about the content we enforce on.

Google Ads accounts with Misrepresentation violations (by billing country):

EU member Countries	Google Ads accounts with Misrepresentation violations (by billing country)
AT	148
BE	123
BG	277
CY	150
CZ	293
DE	1431
DK	120
EE	45
ES	903
FI	100
FR	1092
GB	1706
GR	121
HR	115
HU	239
IE	139
IT	737
LT	69

LU	30
LV	57
MT	64
NL	673
PL	698
PT	150
RO	403
SE	178
SI	84
SK	89
Total	**10,234**

Misrepresentation by publishers using AdSense

We launched AdSense in 2003 to help publishers fund their content by placing ads on their website. Over time, it has become a core part of our advertising products, serving more than two million website owners around the world.

In addition to ensuring that Google Ads should not be misrepresentative, nor point users to misrepresentative websites (as described in the previous section), we strive to ensure that AdSense does not enable the monetization of misrepresentative websites. That's why our AdSense policies mandate that ads may not be placed on pages that misrepresent, misstate, or conceal information about the website's publisher, their primary purpose, or the web property they operate. An example of such misleading behaviour is directing content about politics, social issues, or matters of public concern to users in a country other than the publisher's if they misrepresent or conceal their country of origin or other material details about themselves.

We did not find any AdSense publishers with EU payment information in violation of our misrepresentative content policies in the monitored period. Keep in mind that much of the content on AdSense that we would classify as disinformation content is taken down under other policies, like unoriginal content as reported below. Because our systems optimize for the timeliness and effectiveness of enforcement, we do not verify whether an AdSense account we took action against for unoriginal content would also have infringed upon other policies, including our misrepresentative content policy. Empirically, though, we have noted that many malicious actors engage in a multiplicity of harmful behaviors -- making it likely that many of the websites we take action against under one policy were also problematic under others, notably including misrepresentation.

Insufficient original content

We also continue to monitor for and take action on content that is insufficiently original and provides no value to users. This is relevant to the purposes of this report because while this

behavioral pattern is not exclusive to propagators of disinformation, we have observed that a number of them do use it in order to increase the magnitude of content available on their website and give the impression that their operations are bigger or more legitimate than they are in reality. In Google Ads, this set of behaviors falls under our policy on "insufficient original content"; on AdSense, similar behaviors are covered by our "valuable inventory" policy -- these different names and framings reflect the fact that one of these policies is about the content that an ad leads to, while the other is about the websites where ads are displayed.

We detected and took action on 5,904 EU-based Google Ads accounts in violation of our policy on insufficient original content. Additionally, we detected and took site- or account-level action on 370 EU-based AdSense publishers who were trying to serve ads on non-valuable inventory on their site. Breakdowns by countries are available below.

These policies prevent driving traffic to, or the monetization of, websites that provide little or no value to users or that have excessive advertising. In the context of disinformation, this helps address low quality content that is copied over many different sites in an attempt to spread the message more widely. Specifically, these policies cover a wide range of behaviors, including sites that:
- Have more ads than content or no content at all
- Copy or replicate content from other sites without adding any additional content or functionality, including the use of mirroring (sites with identical or near-identical content as another site), framing (making content from a site viewable directly on another site), or scraping (automatically copying content from another site via methods like bots or web crawlers)
- Automatically generate content without manual review or curation

As per our usual process under both Google Ads and AdSense policies, policy-violating content associated with those accounts was demonetized -- meaning that we stopped serving violating ads, and removed advertising from violating sites.

We also take action on individual pages that violate our AdSense policy, though those actions are not reflected in this report. As is the case for misrepresentative content, not all of these policy violations are associated with disinformation campaigns, but our policies are devised to make sure that we are only enabling monetization for content that is valuable to users.

As abuse patterns differ from product to product, readers should refer to the descriptions of specific policies for a more granular understanding of the content and behaviors we take action against.

A country-by-country breakdown is available below. Each of these accounts has attempted to drive traffic to or make money from copied or replicated content in at least one of the ways mentioned above as part of the advertising campaigns they created using billing information

from one of the EU28 countries -- for instance, by scraping content from another site and reposting it on their own site without additional commentary. By taking action on these accounts, we were able to prevent advertisers from using our platform in ways that spread low quality information widely across the web, including in ways associated with disinformation campaigns.

Google Ads accounts with Insufficient Original Content violations (by billing country):

EU member countries	Google Ads accounts with Insufficient Original Content violations (by billing country)
AT	65
BE	44
BG	46
CY	146
CZ	70
DE	875
DK	47
EE	16
ES	913
FI	23
FR	469
GB	1611
GR	54
HR	18
HU	48
IE	106
IT	393
LT	23
LU	126
LV	14
MT	10
NL	268
PL	285
PT	56
RO	89
SE	49

SI	17
SK	23
Total	**5,904**

AdSense accounts with Valuable Inventory violations (by payment country)

EU member countries	AdSense accounts with Valuable Inventory violations (by payment country)
AT	6
BE	3
BG	5
CY	2
CZ	5
DE	91
DK	1
EE	1
ES	18
FR	13
GB	129
GR	1
IE	2
IT	56
LT	5
LV	2
NL	11
PT	4
RO	12
SE	2
SI	1
TOTAL	**370**

In addition to the monthly EU-focused numbers we have been providing for 2019, we also published a global perspective of how we work to enable a safe digital advertising ecosystem on March 14, 2019. We share these numbers yearly to provide insights into key actions and data about our efforts to keep the digital advertising ecosystem safe by enforcing our policies across platforms. With regards to disinformation, the report talks about our election integrity efforts in the US, EU, and India, as well as our ongoing enforcement against misinformation and low quality sites. In 2018, we removed ads from approximately

1.2 million pages, more than 22,000 apps, and nearly 15,000 sites across our ad network for violations of policies that prohibit misrepresentative, hateful or other low-quality content.

2) POLITICAL ADVERTISING:

We continue to make progress on our efforts to require verification and disclosure for election ads in the European Union Parliamentary elections. Advertisers that want to run ads that reference a political party, candidate, or current office holder are required to be verified by Google. For some ad formats, Google adds a built-in disclaimer based on the advertiser's verification information. For other ad formats, the advertiser is responsible for incorporating the disclaimer into the ad on their own.

The relevant policy was published in our policy help center in January. In February we launched more details as to the specific verification requirements that advertisers will need to meet in order to run election ads. Applications for verification opened on March 14, 2019, and we started enforcing our policy for election ads in the EU on March 21, 2019. In-ad disclosures of who paid for these election ads began to show in late March. Prospective advertisers are required to go through a two-step verification process to prove that they are eligible to advertise in these elections, to take place as follows:

Two-step verification process:
Step one will verify the advertiser's eligibility to run election ads by providing the following information:
- Google Ads Customer ID
- Email address
- Country the organization is registered in
- Name of the organization
- Document confirming organization name
- Official address
- Document showing proof of address
- Attestation that the authorized representative is a citizen of an EU member state
- Attestation that the organization applying for verification is based in an EU member state
- Agreement to the Google Election Ads terms

Step two will verify the advertiser's identity by providing the following information:
- Organization name
- Organization address
- Document showing proof of address
- Registration document or number for the organization
- Authorized representative name
- Authorized representative address
- A copy of the authorized representative's government issued photo ID

- Attestation that the authorized representative is a citizen of an EU member state
- Attestation that the organization applying for verification is based in an EU member state
- Agreement to the Google Election Ads terms

We have clearly communicated this in our political content policy and verification requirements. On top of that, our local Google teams have been trained on this process in order to be able to respond to requests from the political parties and institutions responsible for the elections. We are also explaining this process during our elections trainings for political parties and candidates.

From when enforcement of this policy began through the end of March, we received 120 verification applications and successfully verified 18 advertisers to run election ads in the EU Parliamentary elections. Of those applications that were not verified, 16 are pending further review by our team, while 86 were rejected. Many of those applications are legitimate advertisers who were rejected for failing to provide the appropriate documents; we are working to assist them in navigating the verification process. We have also identified and labelled more than 11,000 election ad creatives in our system from verified advertisers. Additionally, we have prevented more than 12,000 election ads from being served where there was not proper verification of the advertiser.
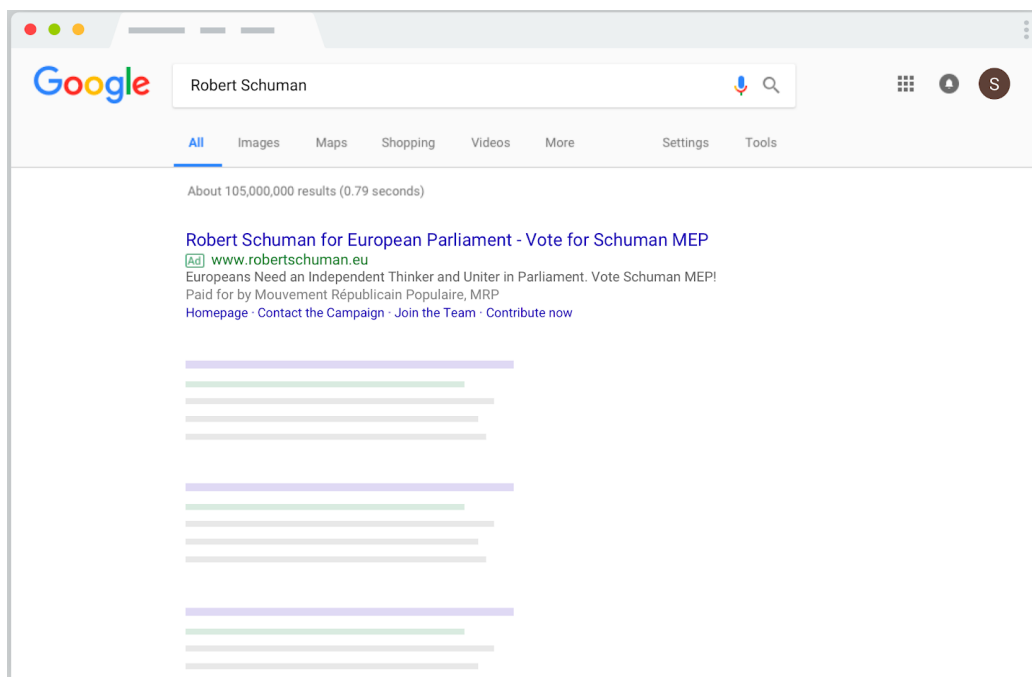
Example: Mock of a paid-for-by disclosure for an ad on Google Search featuring a candidate for EU Parliament
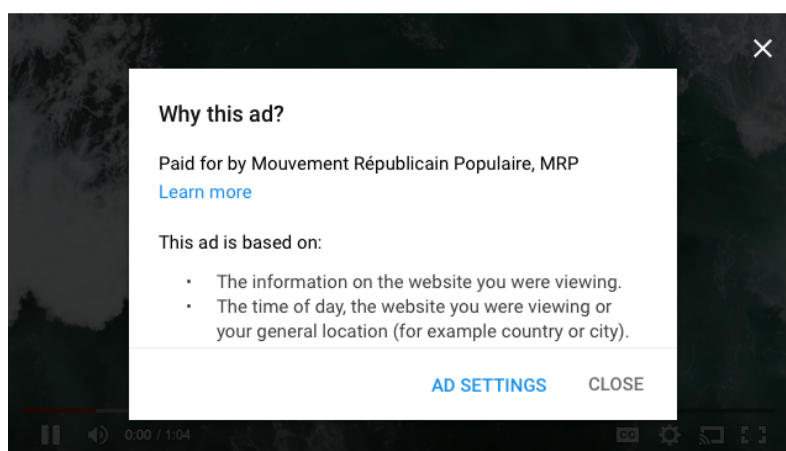
Example: Mock of a paid-for-by disclosure for a YouTube ad featuring a candidate for EU Parliament

As mentioned in our prior monthly reports, in the coming weeks we will be launching an EU Election Ads Transparency Report and a **searchable** ad library to provide more information about who is purchasing election ads, who is being targeted, and how much money is being spent. The report will allow anyone to view each individual advertisement that was shown to users and see information as to the targeting and amount spent. Our goal is to make this information as accessible and useful as possible to users, practitioners, and researchers wanting to know more. As with our report on political advertising in the United States, this information will be **downloadable** to help researchers analyze this data more effectively, and will have options to filter by different criteria, including location and advertiser.

Thanks to the transparency database, journalists in the United States were able to better cover candidates' advertising strategies and educate voters on candidates' policy positions, outreach efforts and voter engagement strategies during the 2018 midterm elections (see for instance here). Voters got a better view of candidates' campaign efforts, and therefore got a more comprehensive view of a candidate.

Below are early designs that illustrate what the upcoming EU report may look like (subject to change ahead of launch):

26

Example: A possible view of how the EU transparency report may appear (Note: This is subject to change before launch)

Example: A possible view of how the EU transparency report may appear (Note: This is subject to change before launch)

3) INTEGRITY OF SERVICES:

Since the founding of YouTube, there have been attempts to game or manipulate our systems. The techniques that aim to evade our detection have and will continue to evolve. It is business critical to continue to secure the integrity of our services and maintain the trust of our users. For well over a decade, YouTube has built, deployed and invested in proprietary technology to protect against such attempts.

During the month of March 2019, YouTube removed over 1,000,000 channels for violation of its spam, misleading, and scams policy, and more than 2,500 channels for violation of its impersonation policy. These statistics reflect channel removal enforcement actions under these policies on a global basis and across any type of content on YouTube. As described below, YouTube's impersonation policy applies to impersonation of channels, individuals, and organizations. We issue quarterly reports on the Community Guidelines enforcement efforts in our Transparency Report.

YouTube Spam, Deceptive Practices, and Scams Policies (available here):

Examples of channels that would violate this policy include but are not limited to:
- A channel trying to abuse our search and recommendation algorithms by filling a video's title, description, or tags with terms or names (such as the names of celebrities) that are unrelated to the video.
- A channel making exaggerated promises, such as claims that users can get rich quickly or that a miracle treatment can cure chronic illness such as cancer.

This policy applies globally to videos, video descriptions, comments, live streams, and any other YouTube product or feature. Please note this is not a complete list.

YouTube Impersonation Policy (available here):

Examples of channels that would violate this policy include but are not limited to:
- A channel that copies another channel's profile, background, or overall look and feel in such a way that makes it look like someone else's channel.
- Content intended to look like someone else is posting it.
- Content or a channel that imitates someone's real name, user name, image, or other personal information to deceive people into thinking they are someone else on YouTube.

This policy applies globally to videos, video descriptions, comments, live streams, and any other YouTube product or feature. Please note this is not a complete list.

4) ELECTION ACTIVITY:

New trainings and initiatives to protect the integrity of European elections:
- *Trainings for journalists including to identify and tackle disinformation:* Since the start of the year, Google News Lab has provided 3.8k journalists across Europe with in-person training on a range of digital tools.
  - We've trained 1.2k journalists with specific digital verification skills in **18 EU countries**, we'll get to 27 by the elections.

- With the IFCN, the News Lab has **launched** FactCheck EU **-** a collaborative fact-checking network that will provide fact checks from 19 organisations from 10 countries and across 11 languages. Press coverage here.

- News Lab has supported First Draft since 2015, this year they're training journalists to use CrossCheck, a platform to help share knowledge across newsrooms. We hosted **4 events for fact checking journalists in Brussels (60), Frankfurt, Milan (80) and Madrid (40).**

- *In-person trainings from Google experts for those involved in elections:* Google has continued in-person and online security trainings for those most at risk around the upcoming elections. Like how to use our Advanced Protection Program, which gives Google's strongest security for those that need it most. So far we've trained over 2,014 campaign and election officials, journalists and people from election-related NGOs in Europe in-person, so they can learn which security tools they need and how to use them. Our goal is to support these groups in keeping their information secure and enable them to publish freely so that people can access the stories, debates, policies and results when it matters most. In March 2019, we organized 17 in-person training sessions for academics, practitioners, policy-makers and industry representatives, focusing on the EU 2019 elections. These trainings cover using Google and YouTube tools to communicate to voters as well as election integrity and security issues. Overall, we have had 443 participants in these trainings in March 2019. As the education on security risks is rather low among campaigners and those involved in elections, we welcome the Commission's help in scaling education around the key security precautions. Our goal is to cover campaigners from across the European Union and have more trainings in the EU capitals planned in the coming weeks.

Participants in Google Trainings on Election Tools:

EU member countries	Participants in Google Trainings on Election Tools
AT	30
BE	973
DK	19
EE	9
ES	174
FI	77
FR	220
GE	186
HR	100
IE	13
LV	30
MT	35
NL	2
PL	25
PT	65
RO	36
TOTAL	**2.014**

Totals represent all training by Google since November 2018. The numbers represent people trained directly in member states. Trainings in Belgium gather campaigners from multiple EU countries.

Media literacy programs:

Google continues to support media literacy programs across the EU. As mentioned previously, so far we have trained over 1 million people in person through our *Be Internet Citizens* and *Be Internet Awesome* across the EU.

- ○ In March 2019, we have publicly announced the $250,000 grant to "One World at Schools" in CZ, which the grantee will use to develop an educational package to help vocational schools in disadvantaged regions of Czechia train their pupils in skills needed to approach media content critically.
- ○ In Spain, alongside FAD foundation and with the collaboration of all the main media groups in the country, we launched *(In)fórmate*, a Google.org funded program in media literacy. Through offline trainings for 30,000 students, the program will promote critical thinking for a well-informed, empowered and analytical citizens. The Queen of Spain chaired the launch, together with the Spanish Minister of Health and the Secretary of State of Education.

Information campaign in Brussels:

As a part of our effort to raise the awareness among the EU 2019 elections candidates, we have launched an information campaign in Brussels on the elections and online security. The campaign runs at public spaces across Brussels, in print media and online.
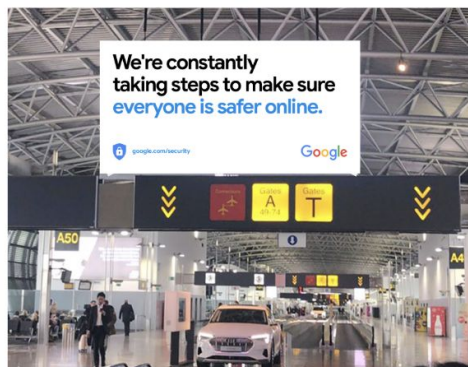
Brussels Airport - Departures
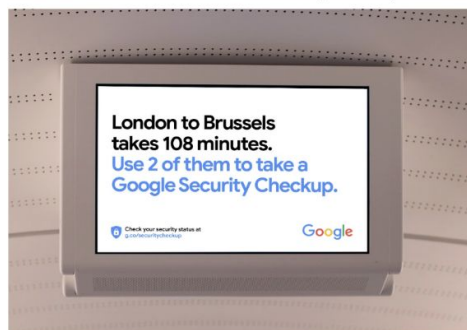
Screen in Eurostar train
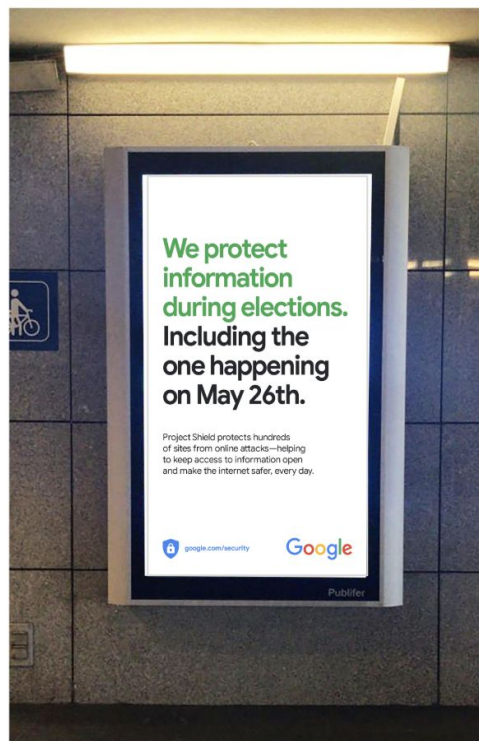
Metro station EU district

Visualization of the information campaign in Brussels

Collaborating with Fact Checkers:
In March, we also launched new tools for the fact checking community and for researchers who seek to better understand the use of these tools on our platforms: a '[Fact Check Explorer](#)', which allows for the exploration of Fact Checking journalism, and the '[Fact Check Markup Tool]', which allows fact checkers to easily mark their own articles as fact-checks in a way that is machine-readable, using the 'ClaimReview' mark-up.

When publishers write a fact check article, they can add [ClaimReview](#) structured data markup to that article. This markup is structured data that contains information about the fact check -- for example, what was the claim being assessed, who made the claim, what was the verdict, [and more](#). Marking up a fact check article will allow search engines to easily recognize that it is a fact check article and thus render it as such in search results and other surfaces.

Those new tools come with dedicated APIs, making it easy for third parties to perform such searches or mark-ups easily and at scale.

ANNEX II - GOOGLE FEBRUARY 2019 REPORT

Over the course of February, we have continued to work towards implementing and enforcing the commitments we made in the Code of Practice on Disinformation. In addition, we published a new white paper detailing our efforts to tackle disinformation across our Search, News, YouTube, and Advertising products, as well as how we partner with others to address those issues -- added as annex III to this Code. We presented this white paper at the 2019 Munich Security Conference and gathered valuable feedback on our efforts from European policymakers, researchers, and civil society experts attending the event.

1) **ADVERTISING:**

Continuing to protect our users from the behaviors of malicious actors:
As a reminder, Google's policies to tackle disinformation on our advertising platforms favor an approach that focuses on misrepresentative or harmful behavior by advertisers or publishers while avoiding judgments on the veracity of statements made about politics or current events. This means that there are a number of policies designed to catch bad behaviors that are used to deceive or scam our users. While these tactics are sometimes associated with disinformation campaigns, they are also commonly used by other bad actors engaged in other malicious activity.

Misrepresentation in Google Ads and the websites they point to
We don't want users to feel misled by ads, so we strive to ensure that the ads that are created and distributed using our systems ['Google Ads'] are clear and honest, and provide the information that users need to make informed decisions. Our policy against misrepresentation does not allow ads or destinations that intend to deceive users by excluding relevant information or giving misleading information about products, services, or businesses. This policy is used to cover a wide range of misrepresentative claims in our enforcement. For example, an ad directing traffic to a site that lies about its credentials or impersonates the brand or logo of a political party or news organization could be removed for violating this policy. We would also apply that same policy to a business running ads that falsely claimed to be a licensed plumber in order to drive traffic to their site. This approach makes it possible for us to enforce our policies at a broader scale and to automate some of the detection of abusive behaviors.

Our policies against misrepresentation also prohibit falsely implying affiliation with, or endorsement by, another individual, organization, product, or service. This includes the misleading use or mimicry of official government sites, stamps, seals, or agency names. A specific example is when an advertiser mimics the layout and design of an official government agency site. Such behaviour would violate our misrepresentation policies and would be acted upon.

With respect to misrepresentative advertising, we detected 20,627 EU-based Google Ads accounts in violation of our misrepresentation policies in February 2019. These ads attempted to reach users on Google properties, like Search and YouTube, as well as on third party properties where publishers elect to host Google Ads to monetize their websites.

A country-by-country breakdown of the violations of this misrepresentation policy is available below. Each of these accounts has engaged in at least one of the deceptive behaviors mentioned in our misrepresentation policies as part of the advertising campaigns they created using billing information from one of the EU28 countries -- for instance, by concealing or making false statements about the identity or qualifications of the advertiser. By taking action on these accounts, we were able to prevent advertisers from using our platform in ways that deceive or scam users, including in ways associated with disinformation campaigns.

As per our usual process, policy-violating content associated with those accounts was disapproved, meaning that we blocked ads from serving to users. In some egregious cases, advertiser accounts were disabled. Note that not all misrepresentation violations are associated with disinformation campaigns. This policy is meant to protect users from being misled by the content they see from advertisers and publishers. Additionally, abuse patterns differ from product to product, so we advise the reader to refer to the respective policies to see more information about the content we enforce on.

Google Ads accounts with Misrepresentation violations (by billing country):

EU member Countries	Google Ads accounts with Misrepresentation violations (by billing country)
AT	339
BE	177
BG	333
CY	236
CZ	263
DE	1279
DK	360
EE	68
ES	1603
FI	618
FR	1073
GR	149
HR	132
HU	428

IE	126
IT	4208
LT	131
LU	73
LV	124
MT	63
NL	1725
PL	2613
PT	221
RO	1582
SE	418
SI	61
SK	79
UK	2145
TOTAL	**20627**

Misrepresentation by publishers using AdSense

We launched AdSense in 2003 to help publishers fund their content by placing relevant ads on their website. Over time, it has become a core part of our advertising products, serving more than 2 million website owners around the world.

In addition to ensuring that Google Ads should not be misrepresentative, nor point users to misrepresentative websites (as described in the previous section), we strive to ensure that AdSense does not unwittingly enable the monetization of misrepresentative websites. That's why our AdSense policies mandate that ads may not be placed on pages that misrepresent, misstate, or conceal information about the website's publisher, their primary purpose, or the web property they operate. An example of such misleading behaviour is directing content about politics, social issues, or matters of public concern to users in a country other than the publisher's if they misrepresent or conceal their country of origin or other material details about themselves.

We found one EU-based AdSense publisher with UK payment information in violation of our misrepresentative content policies in the monitored period. Although this number appears very low, keep in mind that we have been enforcing against this policy for a number of years, having taken action against 650 of these sites globally in 2017. In addition, much of the content on AdSense that we would classify as disinformation content is taken down under other policies, like unoriginal content as reported below. Because our systems optimize for the timeliness and effectiveness of enforcement, we do not verify whether an AdSense

account we took action against for unoriginal content would also have infringed upon other policies, including our misrepresentative content policy. Empirically, though, we have noted that many malicious actors engage in a multiplicity of harmful behaviors -- making it likely that many of the websites we take action against under one policy were also problematic under others, notably including misrepresentation.

Insufficiently original content

We also continue to monitor for and take action on content that is insufficiently original and provides no value to users. This is relevant to the purposes of this report - while this behavioral pattern is not exclusive to propagators of disinformation, we have observed that a number of them do use it in order to increase the magnitude of content available on their website and give the impression that their operations are bigger or more legitimate than they are in reality. In Google Ads, this set of behaviors falls under our policy on "insufficient original content"; on AdSense, similar behaviors are covered by our "valuable inventory" policy -- these different names and framings reflect the fact that one of these policies is about the content that an ad leads to, while the other is about the websites where ads are displayed.

In Google Ads, we detected and took action on 5,501 EU-based accounts in violation of our policy on insufficient original content. And in AdSense, we detected and took site- or account-level action on 215[1] EU-based AdSense publishers who were trying to serve ads on non-valuable inventory on their site. Breakdowns by countries are available below.

These policies prevent driving traffic to or the monetization of content that provides little or no value to users or that has excessive advertising. In the context of disinformation, this helps address low quality content that is copied over many different sites in an attempt to spread the message more widely. Specifically, these policies cover a wide range of behaviors, including sites that:
- Have more ads than content or no content at all
- Copy or replicate content from other sites without adding any additional content or functionality, including the use of mirroring (sites with identical or near-identical content as another site), framing (making content from a site viewable directly on another site), or scraping (automatically copying content from another site via methods like bots or web crawlers)
- Automatically generate content without manual review or curation

As per our usual process, policy-violating content associated with those accounts was demonetized, meaning that we stopped serving violating ads, and removed advertising from violating sites.

We also take action on individual pages that violate our AdSense policy, though those actions are not reflected in this report. As is the case for misrepresentative content, not all of

---

[1] Updated from 69, per our note in the opening of this March 2019 report.

these policy violations are associated with disinformation campaigns, but our policies are devised to make sure that we are only enabling monetization for content that is valuable to users.

As abuse patterns differ from product to product, readers should refer to the descriptions of specific policies for a more granular understanding of the content and behaviors we take action against.

A country-by-country breakdown is available below. Each of these accounts has attempted to drive traffic to or make money from copied or replicated content in at least one of the ways mentioned above as part of the advertising campaigns they created using billing information from one of the EU28 countries -- for instance, by scraping content from another site and reposting it on their own site without additional commentary. By taking action on these accounts, we were able to prevent advertisers from using our platform in ways that spread low quality information widely across the web, including in ways associated with disinformation campaigns.

Google Ads accounts with Insufficient Original Content violations (by billing country):

EU member countries	Google Ads accounts with Insufficient Original Content violations (by billing country)
AT	66
BE	54
BG	54
CY	151
CZ	62
DE	704
DK	44
EE	6
ES	521
FI	39
FR	459
GR	55
HR	24
HU	40
IE	74
IT	337
LT	20
LU	11

LV	32
MT	17
NL	222
PL	323
PT	71
RO	737
SE	66
SI	7
SK	12
UK	1293
TOTAL	**5501**

AdSense accounts with Valuable Inventory violations (by payment country)[2]

EU member countries	AdSense accounts with Valuable Inventory violations (by payment country)
AT	4
BG	7
CY	1
CZ	4
DE	48
EE	1
ES	12
FI	2
FR	12
GB	64
GR	4
HR	1
HU	4
IE	1
IT	10
LT	4
LV	1

---

[2] Updated, per our note in the opening of this March 2019 report.

NL	7
PT	7
RO	10
SE	4
SI	4
SK	3
TOTAL	**215**

In addition to the monthly numbers we have been providing for 2019, in March, we will unveil our 2018 Trust and Safety in Ads report -- providing an outline of the actions we took against malicious actors using our advertising platforms throughout the course of 2018. We will include these new figures in our March CoP report, to be submitted to the Commission in April 2019.

2) POLITICAL ADVERTISING:

We continue to make progress on our efforts to require verification and disclosure for election ads in the European Union Parliamentary elections. Ads that reference a political party, candidate, or current office holder will be verified by Google and be required to disclose to voters who is paying for the ad.

The relevant policy was published in our policy help center in January and in February we launched more details as to the specific verification requirements that advertisers will need to meet in order to run election ads. Prospective advertisers will be required to go through a two-step verification process to prove that they are eligible to advertise in these elections, to take place as follows:

Two-step verification process:
Step one will verify the advertiser's eligibility to run election ads by providing the following information:
- Google Ads Customer ID
- Email address
- Country the organization is registered in
- Name of the organization
- Document confirming organization name
- Official address
- Document showing proof of address
- Attestation that the authorized representative is a citizen of an EU member state
- Attestation that the organization applying for verification is based in an EU member state

---

- Agreement to the Google Election Ads terms

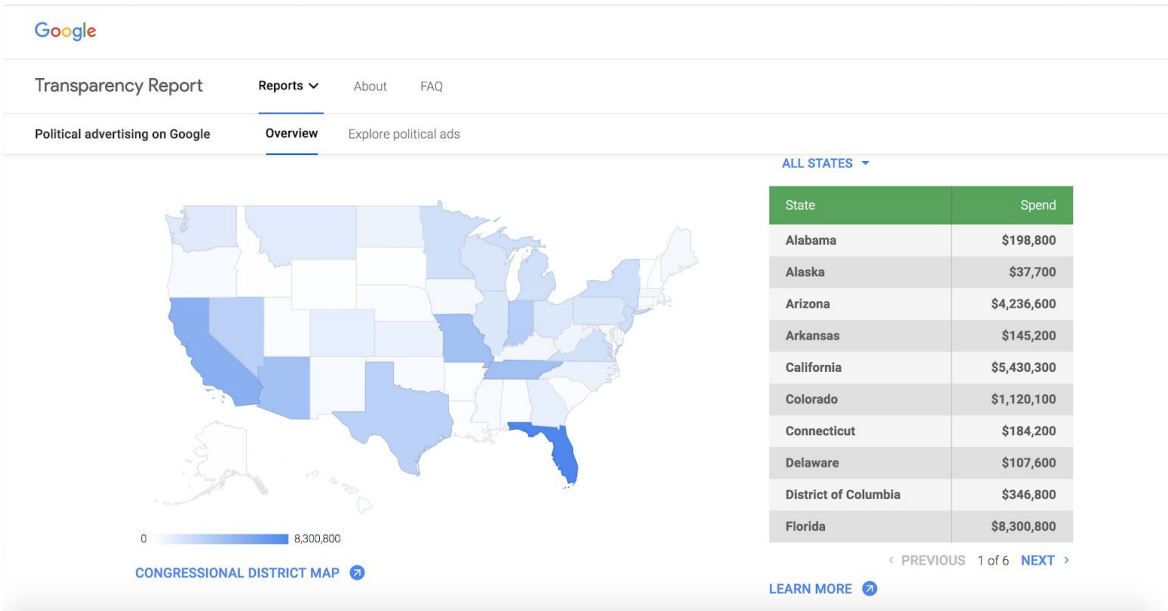*Step two* will verify the advertiser's identity by providing the following information:
- Organization name
- Organization address
- Document showing proof of address
- Registration document or number for the organization
- Authorized representative name
- Authorized representative address
- A copy of the authorized representative's government issued photo ID
- Attestation that the authorized representative is a citizen of an EU member state
- Attestation that the organization applying for verification is based in an EU member state
- Agreement to the Google Election Ads terms

Applications for verification will be open starting March 14, 2019. Google will begin enforcing its policy for election ads in the EU on March 21, 2019. We have clearly communicated this in our political content policy and verification requirements. On top of that, our local Google teams have been briefed in order to be able to respond to requests from the political parties and institutions responsible for the elections. We have also started explaining this process during our trainings for political parties and candidates.

In April 2019, we will be introducing an EU Election Ads Transparency Report and a **searchable** ad library to provide more information about who is purchasing election ads, who is being targeted, and how much money is being spent. The report will allow anyone to view each individual advertisement and see information as to the targeting and amount spent. Our goal is to make this information as accessible and useful as possible to users, practitioners, and researchers wanting to know more. As with our report on political advertising in the United States, this information will be **downloadable** to help researchers analyze this data more effectively, and will have options to filter by different criteria, including location and advertiser.

Thanks to the transparency database, journalists in the United States were able to more fully cover candidates' advertising strategies and educate voters on candidates' policy positions, outreach efforts and voter engagement strategies during the 2018 midterm elections (see for instance here). Voters were able to be more aware of candidates' efforts to persuade voters, and therefore have a more comprehensive view of a candidate when deciding which candidate to support with their vote.

Below are examples from the US to illustrate what this upcoming EU report will look like:

Example: Political advertising transparency report in the U.S (please note that the European transparency report might differ)

Example: Political advertising transparency report in the U.S (please note that the European Transparency report might differ)

3) INTEGRITY OF SERVICES:

Since the founding of YouTube, there have been attempts to game or manipulate our systems. The techniques that aim to evade our detection have and will continue to evolve. It is business critical to continue to secure the integrity of our services and maintain the trust of

our users. For well over a decade, YouTube has built, deployed and invested in proprietary technology to protect against such attempts.

During the month of February 2019, YouTube removed over 629,000 channels for violation of its spam, misleading, and scams policy, and more than 5,000 channels for violation of its impersonation policy. These statistics reflect channel removal enforcement actions under these policies on a global basis and across any type of content on YouTube. As described below, YouTube's impersonation policy applies to impersonation of channels, individuals, and organizations. We issue quarterly reports on the Community Guidelines enforcement efforts in our Transparency Report.

YouTube Spam, Deceptive Practices, and Scams Policies (available here):

Examples of channels that would violate this policy include but are not limited to:
- A channel trying to abuse our search and recommendation algorithms by filling a video's title, description, or tags with terms or names (such as the names of celebrities) that are unrelated to the video.
- A channel making exaggerated promises, such as claims that users can get rich quickly or that a miracle treatment can cure chronic illness such as cancer.

This policy applies globally to videos, video descriptions, comments, live streams, and any other YouTube product or feature. Please note this is not a complete list.

YouTube Impersonation Policy (available here):

Examples of channels that would violate this policy include but are not limited to:
- A channel that copies another channel's profile, background, or overall look and feel in such a way that makes it look like someone else's channel.
- Content intended to look like someone else is posting it.
- Content or a channel that imitates someone's real name, user name, image, or other personal information to deceive people into thinking they are someone else on YouTube.

This policy applies globally to videos, video descriptions, comments, live streams, and any other YouTube product or feature. Please note this is not a complete list.

---

4) ELECTION ACTIVITY:

New trainings and initiatives to protect the integrity of European elections:
- *Trainings for journalists including to identify and tackle disinformation:* Since the start of the year, we have provided 2,743 journalists across Europe with in-person training on a range of digital tools to help strengthen their research and reporting skills and equip them with best practice techniques in the fields of data journalism, visualisation and verification.
  - In addition, we've hosted First Draft two-day workshops to bring news organisations together and consider best practices to tackle misinformation -

events have taken place in Madrid and Brussels, with Milan and Frankfurt still to come.

- *In-person trainings from Google experts for those involved in elections:* Google has continued in-person and online security trainings for those most at risk around the upcoming elections. Like how to use our Advanced Protection Program, which gives Google's strongest security for those that need it most. So far we've trained over 1,600 campaign and election officials, journalists and people from election-related NGOs in Europe in-person, so they can learn which security tools they need and how to use them. Our goal is to support these groups in keeping their information secure and enable them to publish freely so that people can access the stories, debates, policies and results when it matters most. In February 2019, we organized 15 in-person training sessions for academics, practitioners, policy-makers and industry representatives, focusing on the EU 2019 elections. These trainings cover using Google and YouTube tools to communicate to voters as well as election integrity and security issues. Overall, we have had 231 participants in these trainings in February 2019. As the education on security risks is rather low among campaigners and those involved in elections, we welcome the Commission's help in scaling education around the key security precautions. Our goal is to cover campaigners from across the European Union and have more trainings in the EU capitals planned in the coming weeks.

- We have also briefed Google employees in EU28 countries about our political ads verification processes, so that they can provide in-country trainings for political parties and answer any questions they might receive.

Participants in Google Trainings on Election Tools:

EU member countries	Participants in Google Trainings on Election Tools
AT	30
BE	951
DK	19
EE	9
ES	174
FI	77
FR	218
LV	30
NL	2
PL	25
PT	65
TOTAL	**1.600**

Totals represent all training by Google since November 2018. The numbers represent people trained directly in member states. Trainings in Belgium gather campaigners from multiple EU countries.

- *Media literacy programs:* Google continues to support media literacy programs across the EU. As mentioned previously, so far we have trained over 1 million people in person through our *Be Internet Citizens* and *Be Internet Awesome* across the EU. Just in February 2019, we have publicly announced the following grants for European NGOs:
  - $1M grant to e-Enfance: Bringing "Be Internet Awesome" to schools across France
  - $245k grant in Finland to The Mannerheim League for Child Welfare and $137k to Save The Children: Promote media literacy and enhance the digital well-being skills of children, parents, and teachers.
  - $282k to the Portugese Press Association to run a series of workshops and digital skills training programs to help younger and older generations as well as professionals to improve their critical thinking when it comes to consuming information online.

ANNEX III - GOOGLE JANUARY REPORT

Since the start of the year, we have continued to work towards implementing and enforcing the commitments we made in the Code of Practice on Disinformation.

ADVERTISING:

Continuing to protect our users from the behaviors of malicious actors:
Over the course of January, we continued to enforce our policies against behaviors commonly used by malicious actors, who aim to deceive or scam our users, including (but not limited to) propagators of disinformation.

With respect to misrepresentative content, we detected 48,642 EU-based Google Ads accounts in violation of our misrepresentation policies in January 2019. We did not find any EU-based AdSense publishers in violation of our misrepresentative content policies in the monitored period. As per our usual process, content associated with those accounts was demonetized, meaning that we blocked ads from serving to users. In some egregious cases, advertiser accounts were disabled. Note that not all misrepresentation violations are associated with disinformation campaigns, but are meant to prevent users from being misled by the content they see from advertisers and publishers. Additionally, abuse patterns differ from product to product, so you should refer to the respective policies to see more information about the content we enforce on.

The Google Ads Misrepresentation policy, which applies globally to advertisers, prohibits ads that intend to deceive users by excluding relevant information or giving misleading information about products, services, or businesses. This includes making false statements about your identity or qualifications, or making false claims that entice a user with an improbable result. In addition to specific policies against misrepresentation, we have a number of other policies that protect our users from different types of abusive content -- including content that could be considered disinformation. Sometimes, these policies lead us to take action against content that is described as "fake news" in public debate. These policies include prohibitions on monetization of valuable inventory policy and dangerous or derogatory content, both of which apply globally.

A country-by-country breakdown of the violations is available below:

EU member Countries	Google Ads accounts with Misrepresentation violations (by billing country)
AT	104
BE	84

BG	120
CY	81
CZ	221
DE	849
DK	88
EE	12295
ES	615
FI	55
FR	666
GB	16679
GR	57
HR	100
HU	155
IE	88
IT	6226
LT	51
LU	15
LV	52
MT	27
NL	275
PL	622
PT	244
RO	8652
SE	104
SI	51
SK	66
TOTAL	**48642**

We also continue to monitor for and take action on content that is insufficiently original and provides no value to users. In Google Ads, we detected and took action on 3,258 EU-based accounts in violation of our policy on insufficiently original content. And in AdSense, we detected and took site- or account-level action on 205 EU-based AdSense publishers who were trying to serve ads on non-valuable inventory on their site. Non-valuable inventory refers to websites that have more ads than content; use mirroring, framing, scraping or rewriting of content from other sources without adding value; automatically generated

content without manual review or curation; hosted ad pages or pages without content; or pages that don't follow our Webmaster Quality Guidelines. As per our usual process, content associated with those accounts was demonetized, meaning that Google booked ads were stopped from serving to users and sites were prevented from showing ads on them through our system. In some egregious cases, advertiser or publisher accounts were disabled.

We also take action on individual pages that violate our AdSense policy, though those actions are not reflected in this month's report. As is the case for misrepresentation, not all of these policy violations are associated with disinformation campaigns, but are made to make sure that we are only enabling monetization for content that is valuable to users. And again, abuse patterns differ from product to product, so you should refer to the respective policies to see more information about the content we enforce on. A country-by-country breakdown is available below:

EU member countries	Google Ads accounts with Insufficient Original Content violations (by billing country)	AdSense accounts with Valuable Inventory violations (by billing country)
AT	43	6
BE	40	0
BG	26	8
CY	53	2
CZ	100	6
DE	515	58
DK	43	6
EE	9	0
ES	246	40
FI	17	1
FR	279	4
GB	1074	0
GR	29	0
HR	15	1
HU	14	8
IE	64	0
IT	214	2
LT	11	2
LU	6	0
LV	18	0
MT	11	0
NL	147	18

PL	145	10
PT	38	8
RO	38	10
SE	39	1
SI	6	2
SK	18	12
TOTAL	**3258**	**205**

POLITICAL ADVERTISING:

New policies mandating identity verification for advertisers who would like to run Election Ads:
On 29 January, we published our [new ads policy for election ads](#) that applies in all EU member states. This policy, which is available in 25 EU languages, requires that advertisers must be verified in order to run ads that feature a political party, or a current elected officeholder or candidate for the EU Parliament. These ads will feature in-ad disclosure of who paid for the ad and be included in our political ads transparency report. The announcement was made via a [blog post](#) and featured in our [Change Log](#) in our Advertising Policies Page.

To be verified, advertisers wanting to run EU parliamentary election ads on Google's platforms will be required to provide documentation to show they're an EU-based entity or citizen of an EU member country. More information about verification will be published in February 2019.

We expect to start publishing our transparency report as advertisers begin to run ads as we approach the elections.

INTEGRITY OF SERVICES:

As outlined in our 2018 baseline report, Google takes very seriously any threats to the integrity of our services. We operate policies that apply evenly across all types of actors and accounts, regardless of whether they are automated or human. They prohibit impersonation, misrepresentation, abusive account creation, engagement abuse and influence operations. You can find more detail about the operation of those policies in the annex below. We will continue to report on the implementation of these policies and will examine including relevant quantitative measures related to this area in a forthcoming report

Dedicated elections teams clamping down on abuse: Our work to prevent election-related abuse ahead of and during elections means teams and subject matter experts across Google are working closely together. These teams, many of whom are based in Europe, are

trained to identify and stop a wide range of potential abuse from State Sponsored phishing attacks to attempts to alter Maps so people can't find their polling station. We're also constantly working to get people to authoritative content and improving our systems to combat the effects of disinformation. We're staffed so we can get ahead of abuse, clamp down on malicious activity, and react rapidly to breaking threats. Google's Trust & Safety teams have long worked in partnership with Google Security's Threat Analysis Group (TAG) and our partners at Jigsaw to identify malicious actors, disable their accounts, warn our users about them, and share intelligence with other companies and law enforcement officials.

ELECTION ACTIVITY:

New trainings and initiatives to protect the integrity of European elections:
- *Trainings for journalists including to identify and tackle disinformation:* Over the course of January 2019, we have provided 1,034 journalists across Europe with in-person training on a range of digital tools to help strengthen their research and reporting skills and equip them with best practice techniques in the fields of data journalism, visualisation and verification. We've so far hosted free workshops for local and national newsrooms, journalism schools and for freelance members of journalism associations.

- *In-person trainings from Google experts for those involved in elections:* Because it can be hard to know how to be safe online, we're running in-person and online security trainings for those most at risk around the upcoming elections. Like how to use our Advanced Protection Program, which gives Google's strongest security for those that need it most. So far we've trained close to 1,000 campaign and election officials, journalists and people from election-related NGOs in Europe in-person, so they can learn which security tools they need and how to use them. Our goal is to support these groups in keeping their information secure and enable them to publish freely so that people can access the stories, debates, policies and results when it matters most. In January 2019, we organized 15 in-person training sessions for academics, practitioners, policy-makers and industry representatives, focusing on the EU 2019 elections. These trainings cover using Google and YouTube tools to communicate to voters as well as election integrity and security issues. Overall, we have had 258 participants in these trainings in January 2019. As the education on security risks is rather low among campaigners and those involved in elections, we welcome the Commission's help in scaling education around the key security precautions.

- *Media literacy programs:* Google continues supporting media literacy programs across the EU.
  - For instance, in January, The Student View, a Google.org grantee from the UK, scaled their pop–up newsrooms to schools across London and Manchester, training 60 schoolchildren from underserved communities as

local journalists. During these workshops, pupils were trained to spot misinformation and research local issues to write about in pairs.

- ○ Until now, we have trained more than 1 million people in person through our Be Internet Citizens and Be Internet Awesome in the EU. Be Internet Citizens has been designed to teach teenagers about media literacy, critical thinking and digital citizenship, with the aim of encouraging young people to have a positive voice online. Be Internet Awesome is a program from Google that aims to help kids be safe, confident explorers of the online world. In the subsequent monthly reports we will be posting actual numbers related to these activities.

Additional Election Work:

- ● *Project Shield protection against DDOS attacks***:** Journalists, campaigns and political parties, NGOs and election monitoring groups ensure people can stay informed during election periods. It's never been more necessary to defend these groups from digital attacks that can exploit many thousands of computers to overwhelm a website's servers and take it offline—preventing voters from getting official information when they need it most. Project Shield uses Google's infrastructure to protect independent news sites from distributed denial of service attacks (DDoS) and Jigsaw is now offering strong, free DDoS-protections to the organizations across Europe that are vital to free and fair elections. You can find out more about Jigsaw and apply for Shield protection here.

Encouraging and advancing research on synthetic media ('deep fakes')

Over the last few years, research on using neural networks to simulate a human voice has significantly advanced, including through the publication of open models, leading to growing capabilities for creators and companies around the world to synthesize increasingly realistic, human-like speech. While these developments have promising potentials in fields like translation, entertainment, and empowering those affected by speech or reading disabilities, they could also lead to impersonation or spoofing – a type of content sometimes referred to as audio 'deep fakes'.

To help advance research on detecting and countering these types of malicious behaviors, Google AI and Google News Initiative have partnered to create a body of synthetic speech containing thousands of phrases spoken by our deep learning 'Text-To-Speech' (TTS) models. On January 31st, we have made this dataset available to all participants in the third party & independent 2019 ASVspoof challenge. This open challenge invites researchers all over the globe to submit countermeasures against fake (or "spoofed") speech, with the goal of making automatic speaker verification (ASV) systems more secure. By training models on both real and computer-generated speech, ASVspoof participants can develop systems that learn to distinguish between the two. The results will be announced in September at the 2019 Interspeech conference in Graz, Austria.

ANNEX IV - GOOGLE BASELINE REPORT

On April 26th 2018, the European Commission published a Communication outlining that "*The exposure of citizens to large scale disinformation, including misleading or outright false information, is a major challenge for Europe*". In response to this threat, the Communication laid out an Action Plan against disinformation, part of which involved the development of a self-regulatory Code of Practice on disinformation for online platforms and the advertising industry, in order to increase transparency and to better protect European citizens.

In May 2018, the Commission convened a "*Multistakeholder Forum on Disinformation"* to draft this self-regulatory Code of Practice. Within the Forum, a "Working Group" comprising Google, other online services, and representatives of the advertising industry and major advertisers, was tasked with drafting the Code.

The Code was published on September 26th, along with the opinion of a "Sounding Board" composed of representatives of the media, academia and civil society. On October 16th, signatories (including Google) provided their formal subscriptions to the Code, including a list of the commitments to which they adhere, a table listing company best practices, and future milestones for the overall implementation of the Code in the European Union. In addition, a number of the signatories (including Google) have outlined a number of specific activities they will carry out with a view to, and in advance of, the European Parliament elections of 2019, focusing on the security and integrity of elections.

On December 5th, the Commission [adopted a Report](#) assessing the progress made in the implementation of the actions set out in the April Communication on online disinformation. In the Report, the Commission considers that "*the Code provides an appropriate framework for pursuing the objectives for the Code set out in the Communication*", and that "*the Code is consistent with the Commission's Principles for Better Self-and Co-Regulation*". It however emphasises that "*Signatories must now work to ensure the robust implementation (...) of the policies and actions they have identified (...) on a full, effective, and timely basis"*.

As a first step, Code signatories are to share "*up-to-date information about measures taken towards the implementation of the Code by the end of 2018*", to be published in January 2019. Moreover, "*between January and May 2019, the Commission will carry out a targeted monitoring of the Code on a monthly basis to verify that effective policies with particular pertinence to the integrity of the electoral processes are in place before the European elections*".

Throughout 2018, Google acknowledged the Commission's concerns with regards to disinformation and was a committed participant to the consultation processes and multi-stakeholder forums it set out. We fully engaged with the drafting of the Code of

Practice on disinformation (see blogpost), and are pleased that the Commission agrees that it represents an appropriate framework to pursue the objectives it set out in April. We intend to continue to work together with the European Commission in the run up to the 2019 European Parliamentary elections and beyond (see blogpost).

This report represents Google's first response to the request outlined by the Commission in its December 5th report. It covers measures taken by Google and YouTube towards the implementation of the Code of Practice.

For the purposes of this initial report, we organize our response in five sections, one for each commitment within the Code. Each section comprises a reminder of the commitments we made as part of the Code, and outlines actions we undertook to further those goals.

This initial report will be followed by others between January and May, where we will outline more implementation details and metrics as elections-related product and policy changes are rolled out.

CONTENT:
1. Scrutiny of Ad Placements
2. Political Advertising and Issues-Based Advertising
3. Integrity of Services
4. Empowering consumer
5. Empowering the Research community

1. SCRUTINY OF ADS PLACEMENTS

Signatories to the Code of Practice agreed to the following Commitment:
1. *Relevant Signatories commit to deploy policies and processes to disrupt advertising and monetization incentives for relevant behaviours, such as misrepresenting material information about oneself or the purpose of one's properties. These policies and processes can include, for example, the restriction of advertising services or limiting paid placements, and could potentially take place in partnership with fact-checking organizations. Such policies and processes may, as appropriate:*
   - *(a) Promote and/or include the use of brand safety and verification tools;*
   - *(b) Enable engagement with third party verification companies;*
   - *(c) Assist and/or allow advertisers to assess media buying strategies and online reputational risks;*
   - *(d) Provide advertisers with necessary access to client-specific accounts to help enable them to monitor the placement of ads and make choices regarding where ads are placed.*

How we are complying with this Commitment by end of 2018:
In order to protect our users and advertisers who trust our services with the distribution of their ads, we have rolled out a number of policies and processes geared towards disrupting the monetization incentives of malicious and misrepresentative actors.

Publishers and advertisers who wish to use our ad networks are obligated to comply with our policies against misrepresentation that apply globally. The Google Ads Misrepresentation policy, which applies globally to advertisers, prohibits ads that intend to deceive users by excluding relevant information or giving misleading information about products, services, or businesses. This includes making false statements about your identity or qualifications, or making false claims that entice a user with an improbable result. Similarly, publishers who are members of our AdSense network are prohibited via our Misrepresentative Content policy from misrepresenting, misstating, or concealing information about themselves, their content or their primary purpose of their web property.

Google Ads Misrepresentation policy (available here):
We don't want users to feel misled by ads, so we strive to ensure ads are clear and honest, and provide the information that users need to make informed decisions. We don't allow ads or destinations that intend to deceive users by excluding relevant information or giving misleading information about products, services, or businesses.
This policy applies globally to all Ads served by Google.

AdSense Misrepresentative content policy (available here):
Users don't want to be misled by the content they engage with online. For this reason, Google ads may not be placed on pages that misrepresent, misstate, or conceal information about you, your content or the primary purpose of your web property.
This policy applies globally for all webmasters using Google Ads to monetize their websites.

In addition to specific policies against misrepresentation, we have a number of other policies that protect our users from different types of abusive content -- including content that could be considered disinformation. Sometimes, these policies lead us to take action against content that is described as "fake news" in public debate. These policies include prohibitions on monetization of valuable inventory policy and dangerous or derogatory content, both of which apply globally.

Valuable inventory policy (available here):

Examples of unacceptable pages include but are not limited to:
- Mirroring, framing, scraping or rewriting of content from other sources without adding value;
- Pages with more advertising than publisher-provided content;
- Automatically generated content without manual review or curation;
- Hosted ad pages or pages without content;
- Pages that don't follow our Webmaster Quality Guidelines.
This policy applies globally to all Ads served by Google.

Google Ads Inappropriate content policy (available here):
We value diversity and respect for others, and we strive to avoid offending users, so we don't allow ads or destinations that display shocking content or promote hatred, intolerance, discrimination or violence. This includes dangerous or derogatory content, such as:
- Content that incites hatred against, promotes discrimination of, or disparages an individual or group on the basis of their race or ethnic origin, religion, disability, age, nationality,

veteran status, sexual orientation, gender, gender identity or other characteristic that is associated with systemic discrimination or marginalisation
- Content that harasses, intimidates or bullies an individual or group of individuals
- Content that threatens or advocates for harm on oneself or others
- Content that seeks to exploit others

This policy applies globally to all ads served by Google.

To make sure that advertisers and publishers on our networks comply with our policies, we continuously monitor our advertising networks for compliance with these policies around the world, using a combination of algorithmic and human reviews. You will find an overview of our efforts in this table:

2017 Takedowns

Overall Policy Violations	3.2 billion ads disapproved 2M pages / month blocked from the publisher network 320,000 publishers terminated from our network 90,000 websites blacklisted from our network 700,000 mobile apps blacklisted from our network
Unoriginal content, including "scraping," duplicating and copying content from other sites	12,000 websites blocked from the publisher network (up from 10,000 in 2016)
Misrepresentative content policy	Of the 11,000 websites we reviewed for potentially violating the misrepresentative content policy, we blocked over 650 of those sites and terminated 90 publishers from our network.

We also take steps to make sure that our customers are aware of all the content policies that apply to them and how they are enforced. Our Google Ads and AdSense content policies are publicly available in those products' respective help centers, including translations into many of the languages spoken in EU member states. Those same help centers also provide information about how we enforce our policies and what customers should do if they want to fix a policy violation. Additionally, we maintain a change log for Google Ads that keeps track of any updates to our policies.

On YouTube, creators who meet our eligibility criteria can apply to join the YouTube Partner Program, which makes their videos eligible to run advertising and earn money through other sources on the platform. Not only does a channel have to apply, but just because creators are eligible to monetize does not mean that all of their content is necessarily eligible to serve ads and earn money. We have a set of Advertiser-friendly content guidelines and disable advertising from running on videos that violate these policies. Our advertisers are understandably sensitive to what content their ads are placed against. These policies ensure that we strike a balance where advertisers and creators are both able to thrive.

Over the last few years, we've taken steps to strengthen our requirements for monetization so

spammers, impersonators, and other bad actors can't hurt our ecosystem or take advantage of good creators. To apply for membership in the YouTube Partner Program, we increased the thresholds needed for channels to be deemed eligible: channels must have generated 4,000 watch hours in the previous 12 months and have more than 1,000 subscribers. After they apply, our review team will ensure their channel has not run afoul of our monetization, content and copyright policies prior to admitting them to the program. As a part of this process, we believe that only creators with sufficient history and demonstrated advertiser safety will receive access to ads and our other monetization products. In changing these thresholds, we have significantly improved the protections we had in place against impersonating creators.

In addition to these policies, we provide advertisers with additional controls and help them exclude types of content that, while in compliance with our policies, may not fit their brand or business. These controls let advertisers apply content filters or exclude certain types of content or terms from their video, display and search ad campaigns, advertisers can exclude content such as politics, news, sports, beauty, fashion and many other categories. These categories are listed in our Google Ads Help Center[3].

<u>What to look for in subsequent reports</u>
Over the course of 2019, we will provide new metrics (including metrics specific to EU member states) on our enforcement of our advertising policies (including on misrepresentative content), and continue to upgrade our enforcement mechanisms in anticipation of the European elections.

## 2. POLITICAL ADVERTISING AND ISSUES-BASED ADVERTISING

<u>Signatories to the Code of Practice agreed to the following Commitments</u>:
2. Signatories commit to keep complying with the requirement set by EU and national laws, and outlined in self-regulatory Codes, that all advertisements should be clearly distinguishable from editorial content, including news, whatever their form and whatever the medium used. When an advertisement appears in a medium containing news or editorial matter, it should be presented in such a way as to be readily recognisable as a paid-for communication or labelled as such.

3. Relevant Signatories commit to enable public disclosure of political advertising (defined as advertisements advocating for or against the election of a candidate or passage of referenda in national and European elections), which could include actual sponsor identity and amounts spent.

4. Relevant Signatories commit to use reasonable efforts towards devising approaches to publicly disclose "issue-based advertising". Such efforts will include the development of a working definition of "issue-based advertising" which does not limit reporting on political discussion and the publishing of political opinion and excludes commercial advertising. Given the implications related to freedom of expression, Signatories encourage engagement with expert stakeholders to explore approaches that both achieve transparency but also uphold fundamental rights. The work to develop this definition shall not interfere with the areas covered by advertising self-regulatory organisations.

---

[3] https://support.google.com/google-ads/answer/3306596

How we are complying with these Commitments by end of 2018:

→ **Commitment #2 - ads clearly distinguishable from editorial content**: Across all of our products and surfaces and in all European Union Member States, advertisements are clearly labeled as such. This clarity is paramount to the trust of our users.
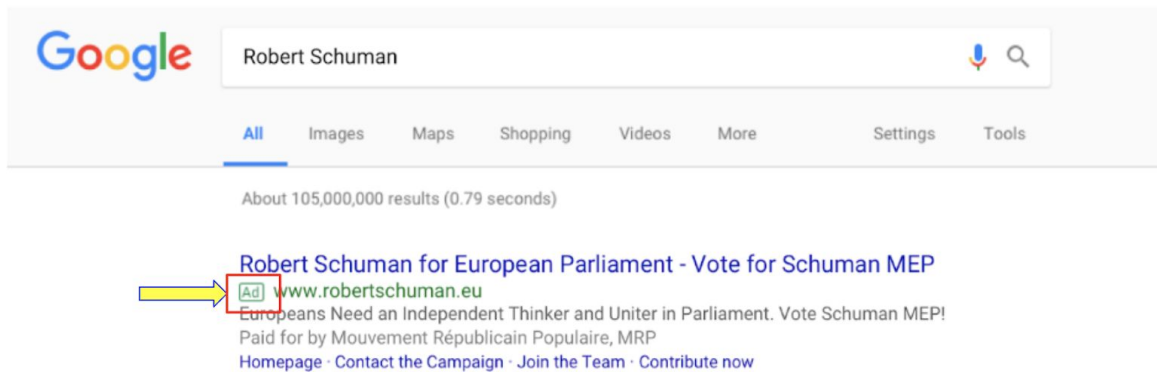
→ **Commitment #3 - public disclosure of political advertising:** As announced in November of 2018, we are hard at work rolling out products and programs to help people get important voting information ahead of the European Union Parliamentary elections. We will require that ads that mention a political party, candidate or current officeholder make it clear to voters who's paying for the advertising. We'll also introduce a new process to verify EU election advertisers to make sure they are who they say they are. And there's more to come: we'll introduce an EU-specific Election Ads Transparency Report and searchable ad library to provide more information about who is purchasing election ads, whom they're targeted to, and how much money is being spent, and make it available via download to the public. Our goal is to make this information as accessible and useful as possible to citizens, practitioners, and researchers.
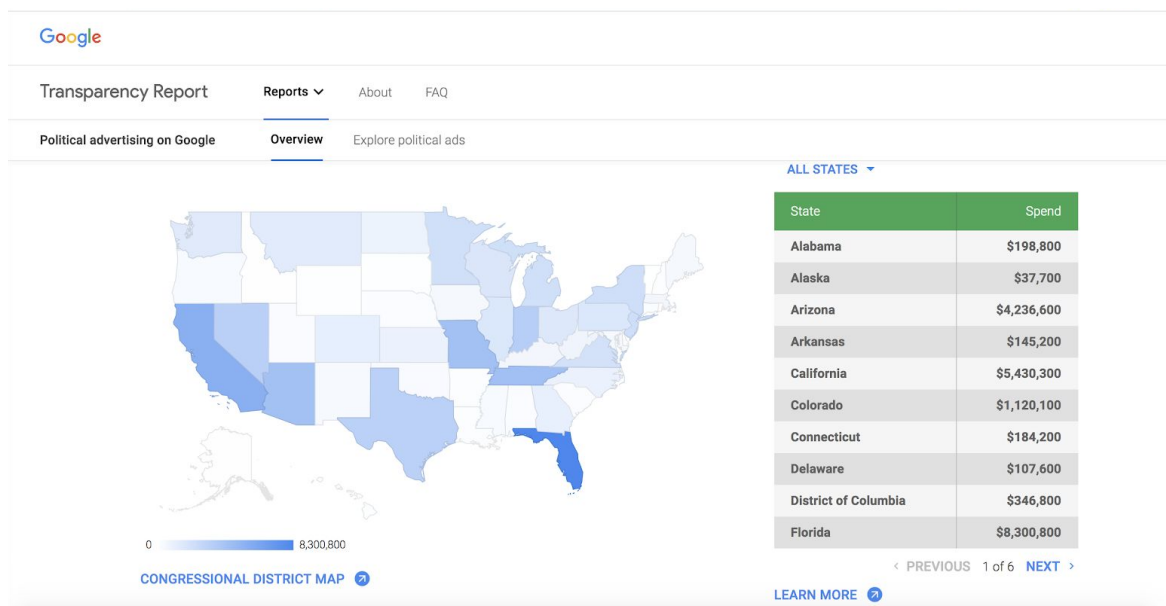
Example: Political advertising transparency report in the U.S (please note that the European Transparency might differ).

This work builds on our experience during the United States 2018 midterm elections, where Google processed for verification more than 2,200 advertisers whose ads featured a Federal candidate or current Federal officeholder. More than 20% of all the political ads for 2018 were submitted during the seven days leading to and including election day, and tens of thousands of advertisement creatives were submitted for Google's creative repository of political advertisements. Google's processes prevented many election ads from unverified advertisers from showing during the U.S. election. We will be bringing these processes to the EU for the election in 2019, along with many learnings from the United States election.

Thanks to the transparency database, journalists in the United States were able to more fully cover candidates' advertising strategies and educate voters on candidates' policy positions, outreach efforts and voter engagement strategies (see for instance here). Voters were able to be more aware of candidates' efforts to persuade voters, and therefore have a more comprehensive view of a candidate when deciding which candidate to support with their vote.

Additional to advertiser verification, we will be requiring advertiser disclosures for political advertisers in the EU for the 2019 election. As we enforce all of our policies, we will be using a combination of automated classifiers and manual review to ensure that our standards are met.

Below is an example of a mock Google search ad for a candidate with the disclosure in the text of the search ad:
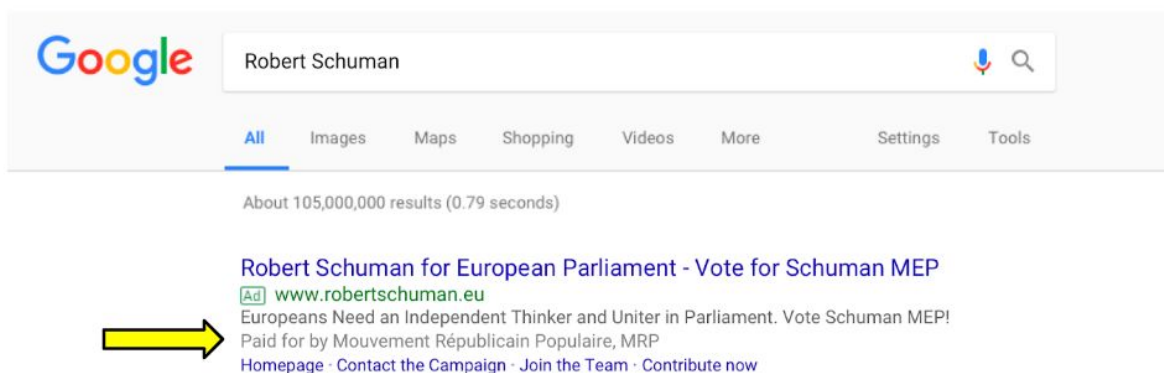
Below is an example of a mock YouTube ad for a candidate with the disclosure in the text of the video ad:
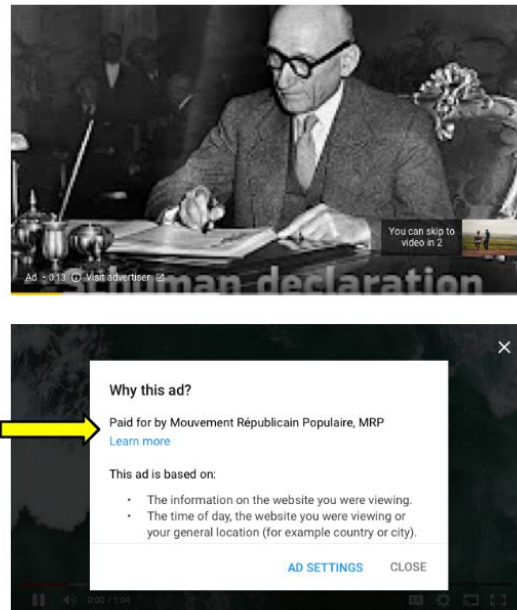
→ **Commitment #4 - public disclosure of issue-based advertising:** We are investigating solutions that would improve transparency of strictly issue-based political advertising (ie not specifically related to an EU election campaign). It remains a challenge amongst the signatories and others in the civil or public sector to find a workable definition of a "political issue," and implementation of such a definition in practice, that would address the challenges laid out by the Code.

What to look for in subsequent reports
We will soon roll out our election ads policy in all EU member states in advance of the May 2019 elections and expect to start publishing our transparency report as advertisers begin to run ads as we approach the elections.

---

3. INTEGRITY OF SERVICES

Signatories to the Code of Practice agreed to the following Commitments:
5. Relevant Signatories commit to put in place clear policies regarding identity and the misuse of automated bots on their services and to enforce these policies within the EU. Such measures could include some of the measures in the Annex 2 to this Code.

6. Relevant Signatories commit to put in place policies on what constitutes impermissible use of automated systems and to make this policy publicly available on the platform and accessible to EU users.

How we are complying with these Commitments by end of 2018:
→ **For both commitments #5 (policies on identity and misuse of automated bots) and #6 (impermissible uses of automated systems):** Our policies apply evenly across all types of actors

and accounts, regardless of whether they are automated or human. They prohibit the following behaviors:

- *Impersonation*: Across our monetized and consumer products (notably including YouTube), we do not allow accounts that attempt to mislead or deceive users by pretending to be someone they are not, or falsely implying an affiliation with a business or individual. We will take action when we find this kind of activity.

- *Misrepresentation in Google News and in our advertising products:* Google News requires that publications be accountable and transparent about their identity, to aid users in determining the credibility of articles and publishers. Publications which falsify, misrepresent, or omit basic information about who they are or where they are based may be removed from News products. Misrepresentation is similarly prohibited for advertisers and publishers using our advertising network, as outlined in section 1 (above).

- *Abusive account creation:* Our systems rely on a host of inputs about historical use and pattern recognition across various services in an effort to detect if an account creation or login is likely to be abusive and to detect and prevent other types of suspicious conduct. As examples, our systems operate to block "bad" account creation or to close groups of such accounts (our consumer Google accounts, upon creation, work across most Google services -- including YouTube). We prevent users from creating a large number of Google Accounts in a short time period. We also require verification, aimed at detecting if a bot is attempting to access or create an account, if we detect suspicious conduct. There is no panacea, however, for this challenge. We continue to work collaboratively with others to identify inauthentic accounts that are used for improper purposes, but our systems are not perfect, and the discovery and deactivation of inauthentic accounts is not always immediate.

- Engagement Abuse: We take any abuse of our systems, on any of our products and services, very seriously. This includes, for instance, attempts to artificially manipulate engagement such as video dislikes or view counts on YouTube, or attempts to game Search ranking algorithms by manufacturing inbound links to one's web property. We have strict policies, including our Webmaster Guidelines for Search and Community Guidelines for YouTube, that govern the rules of the road for what content and behavior is allowed on the platform. Artificial manipulation of engagement such as video dislikes and views violates our policies and is prohibited. Furthermore, for well over a decade, YouTube and Search have invested in, built, and deployed proprietary technology to address such efforts to abuse our systems. While no anti-spam system will ever be perfect, we have extensive safeguards in place to detect and neutralize the impact of these types of abuse on our systems.

- Influence operations: We undertake a broad range of approaches combat political influence operations, which we have regularly reported on over the course of the past two years. Over the course of 2018 only, we provided an update in August about our ongoing efforts to combat political influence campaigns from the Internet Research Agency (IRA) in Russia, as well as our identification of an influence campaign linked to the Iranian government. Our efforts included removing 42 YouTube channels and 1 blog on Blogger associated with the IRA, and removing 39 YouTube accounts and 6 blogs linked to the Islamic Republic of Iran Broadcasting. We provided another update on our efforts to combat political influence operations in November 2018 (same blogpost), noting that we had found limited additional activity linked to the IRA and Iranian operations. Specifically, we removed 1 YouTube channel

linked to IRA, as well as 34 YouTube channels, 6 G+ pages, and 1 blog linked to Iranian operations.

What to look for in subsequent reports
We will continue to report on the deployment and implementation of policies tackling impersonation, misrepresentation, and abusive account creation.

---

4. EMPOWERING CONSUMERS

Signatories to the Code of Practice agreed to the following Commitments:
7. Relevant Signatories commit to invest in products, technologies and programs such as those referred to in Annex 2 to help people make informed decisions when they encounter online news that may be false, including by supporting efforts to develop and implement effective indicators of trustworthiness in collaboration with the news ecosystem.

8. Relevant Signatories commit to invest in technological means to prioritize relevant, authentic and authoritative information where appropriate in search, feeds, or other automatically ranked distribution channels.

9. Relevant Signatories commit to invest in features and tools that make it easier for people to find diverse perspectives about topics of public interest.

10. Signatories commit to partner with civil society, governments, educational institutions, and other stakeholders to support efforts aimed at improving critical thinking and digital media literacy.

11. Signatories commit to encourage market uptake of tools that help consumers understand why they are seeing particular advertisements.

How we are complying with these Commitments by end of 2018:

→ **Commitment #7 - products, technologies, and programs to help people make informed decisions when they encounter online news that may be false**: Part of our approach to this goal lies in the very nature of Google Search, which by design presents users with a wide array of webpages and information. This gives users access to a plurality of perspectives, helping them get the full picture on news stories of interest to them. In addition, we strive to elevate context and information that help users make judgments about the quality of information they encounter online. We are investing in many efforts to that end, including:
- *Surfacing Fact-Checks on Google*: in 2016, we launched the Fact Check label in Google News and Search to make it easier for people to find articles that fact check public information, ranging from claims to public statements to statistics. Initially available in the US only, this feature was expanded globally in April 2017 and is used today by fact-checkers in France, Germany, the UK, Italy, Spain, Poland, Austria, Sweden, Croatia, Netherlands, Denmark, and more. To discover Fact-Checks on Google, users merely have to browse Google Search or News and to look for links that show a "fact-check" tag or snippet. This feature is open to all publishers who signal their use of fact-checking by using a dedicated html mark-up and comply with our policies on fact-checking. Over time, we have made it even easier for fact-checkers to help Google find and distribute fact-checking content across Google, as Alphabet's Think/Do tank Jigsaw and the Duke University Reporters' Lab created

a "Share the Facts" widget, which provides an easier alternative for publishers of fact-checks than adding HTML mark-ups.

- *Working with the Trust Project to help surface indicators of credibility*: Google is participating in and providing financial support to the Trust Project, which explores how journalism can signal its trustworthiness in an increasingly chaotic media landscape. The Trust project has developed eight indicators of trust publishers can use to better convey why their content should be seen as credible, with promising results for the publishers who have adopted them on an early trial basis. For example, after the Trinity Mirror in the UK implemented the Trust Project, consumer trust in the newspaper increased by 8 percent. Trust Project participants in Europe include Die Zeit, The Economist, La Repubblica, La Stampa, El Mundo, El Pais, Corriere Della Sera, Deutsche Presse-Agentur (DPA), BBC, FourFourTwo, and more.
- *Working with the Credibility Coalition and the World Wide Web Consortium on markers of information credibility online:* With funding from Google News Initiative, the Credibility Coalition set out more than a year ago to build a project that would develop, test, research, and generate data to support the creation and use of third party credibility signals. CredCo has since built an interdisciplinary community that has worked to define and validate qualitative and quantitative hypotheses about the most meaningful signals of content and source credibility.

→ Commitment #8 - technological means to prioritize relevant, authentic and authoritative information: Google Search, News, and YouTube's businesses rely upon continuously meeting our users' expectations that we provide them with the best results for their queries, and as such, we continuously invest in the testing and improving of our ranking algorithms -- rolling out thousands of updates every year (e.g. more than 2,400 updates to Google Search algorithms in 2017 alone).

Every time a user searches for something on Google, our algorithms work to understand the meaning of their query and to rank the pages in our index according to signals including their *relevance* to the user's expectation (does the webpage content cover the subject matter the user is asking about? Are the user's keywords present in this webpage?) and their authoritativeness (Google's estimate of the expertise, authority, and trustworthiness of a web page, based on factors like whether users and other sites on the web seems to trust this web page)[4]. YouTube similarly requires that the Breaking News and Top News shelves only include videos from news sources that satisfy the Google News standard. For subject matters related to news and civic issues, we realize that our users have high expectations when it comes to the trustworthiness of the results we present them. We give more importance to factors related to authoritativeness in response to such queries. This, as well as all other goals and principles of Google Search, is outlined in our Search Quality Raters Guidelines.

This approach, ensures that we prioritize authoritative information. In addition, we have implemented a number of other measures towards the same goal:

- *Additional ranking safeguards during breaking news events:* during breaking news or crisis situations, stemming the tide of misinformation can be challenging. Speculation can outrun facts as legitimate news outlets on the ground are still investigating. At the same time, malicious actors are publishing content on forums and social media with the intent to mislead and capture people's attention as they rush to find early information online. To reduce the visibility of this type of content during crisis or breaking news events, we are improving our systems across Google and YouTube in Europe to put even more emphasis on authoritative results over factors like freshness or relevancy for these breaking news situations.

---

[4] For more information on Search ranking, see: www.google.com/search/howsearchworks

- *Breaking News and Top News Shelves on YouTube*: On YouTube, we have worked to launch several product features that prominently surface news content from only authoritative sources. Two such cornerstone products have been the Top News shelf in YouTube search results and the Breaking News shelf on the YouTube homepage. The Top News shelf triggers in response to certain search queries that have news-seeking intent. Our systems rely on a variety of signals that we derive from Google News and from our own systems when a user might be seeking information on news-related topics. Given the user's intent is to find out more information in this domain where the authority of content and source is particularly important, we display a clearly delineated shelf in the product where we only surface content from authoritative, verified news channels. The Breaking News shelf triggers when there is a significant news event happening in a specific country. This shelf triggers automatically and is shown prominently on the YouTube homepage to all users in the country. Similar to the Top News shelf, only content from authoritative sources is eligible to be surfaced in the Breaking News shelf. In the EU today, these products are launched in the UK, Germany, France, Italy, Poland, Sweden, the Netherlands, Ireland, and Spain, with more countries to be covered over the course of 2019.

**Breaking News Shelf on YouTube Homepage**
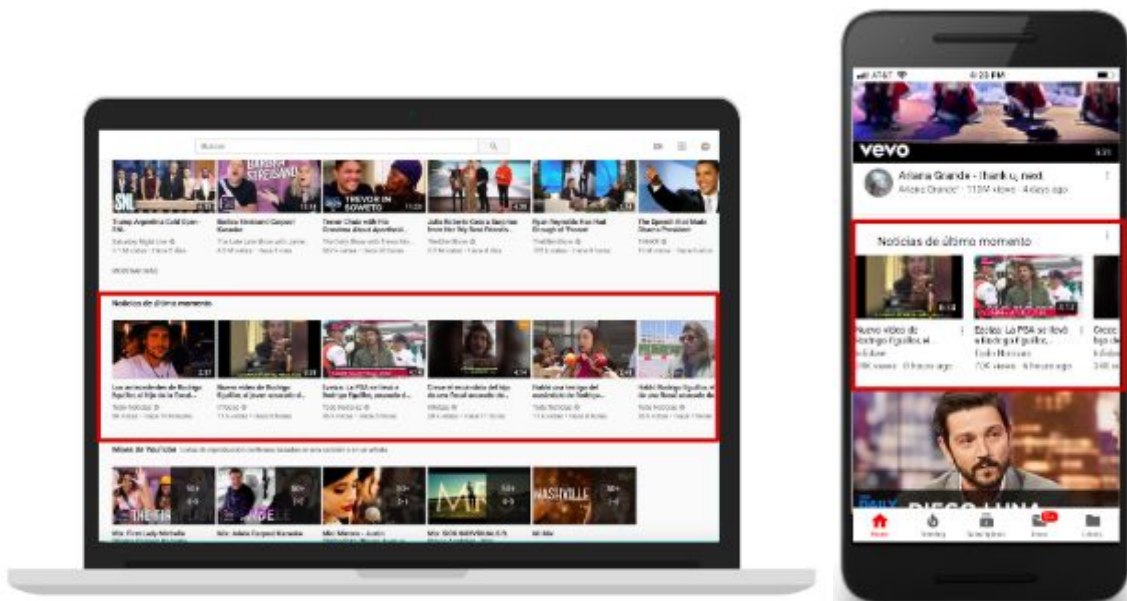
Top News Shelf on YouTube Search
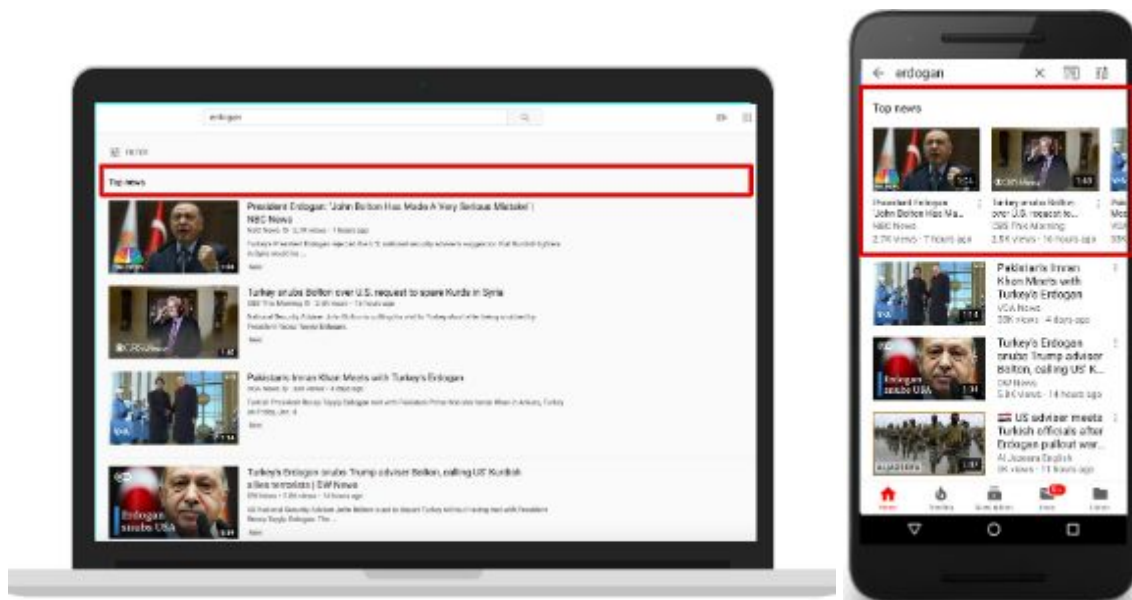
We are also working with candidates, political parties and public authorities to surface relevant and authoritative content during the election period. During 2018 we trained over 800 campaigners on how to manage their online presence using Google Search, including Google's Knowledge Panels, and YouTube. We also trained these campaigners on how to protect their campaigns through our offering of the Advanced Protection Program for email and Project Shield for websites. In November, we held trainings specifically for MEPs, candidates and their staffers directly in the European Parliament or in their political groups' annual congresses. We will continue and expand such outreach efforts to political parties, campaigners, NGOs, civil society and others ahead of the 2019 elections.

→ **Commitment #9 - features and tools that make it easier for people to find diverse perspectives about topics of public interest:** as mentioned above, the very nature of our products means that users searching for a topic see a plethora of results from various perspectives, whether they're looking on Google Search, News, or YouTube. That said, we acknowledge the importance of ensuring that users are not locked into a single set of perspectives, and have launched a number of additional efforts to that end:

- *Full Coverage in Google News*: to help users access context and diverse perspectives about the news stories they read, the *"Full Coverage"* feature in Google News lets users explore articles and videos from a variety of publishers related to an article or news story of their choice. The *"Full Coverage"* feature is not personalized, and accessible in one click or tap from most articles in Google News' "*For You*" and "*Headlines*" tabs. It is live in all EU28 Member States except for Spain and Denmark.
- *Breaking News and Top News Shelves on YouTube:* The news shelves outlined above always provide a set of news videos from a wide array of authoritative sources on a particular news topic. Providing multiple videos from a range of channels with varying perspectives provides users with easy access to engage with diverse news content on topics of public interest.
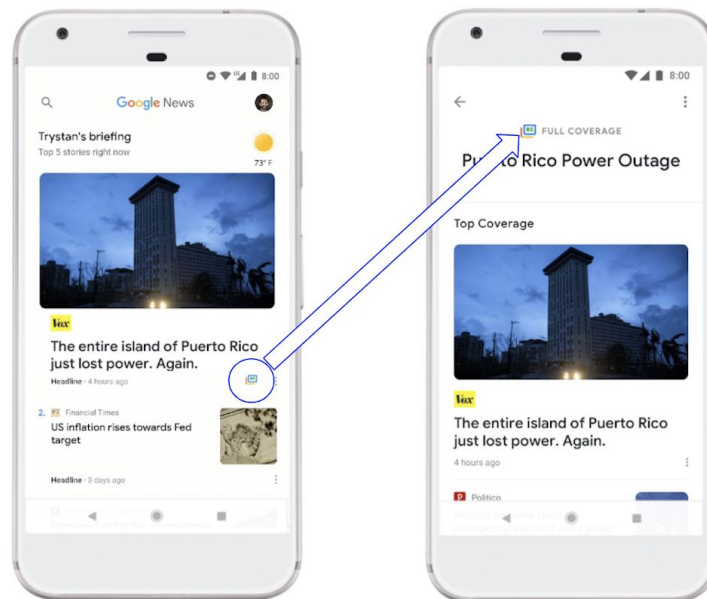
Full Coverage in Google News

→ **Commitment #10 - Signatories commit to partner with civil society, governments, educational institutions, and other stakeholders to support efforts aimed at improving critical thinking and digital media literacy.**

Media literacy continues to be one of the most important issues of our digital age: a recent study from the Stanford History Education Group found that 93 percent of college students couldn't flag a lobbyist's website as biased, and 82 percent of middle schoolers couldn't distinguish sponsored content from real news. Google is committed to helping tackle this challenge.

Our 'Be internet awesome[5]' campaign aims at empowering children to be safe and confident digital citizens is critical – but isn't something any one group can solve alone. We worked with the Family Online Safety Institute, ConnectSafely and iKeepSafe to build a solution that aims to engage with parents, educators and kids.g This programme was developed in the US, it has been launched in the UK and will be rolled out to other countries in Europe.

We also hope to work with media platforms and cultural influencers to help change the narrative and elevate the voices that are most credible in speaking out against hate and xenophobia. YouTube's Creators for Change program highlights online stars taking a stand against xenophobia and extremism. The 2018 cohort had 61 creators from over 20 countries (including France, Germany, and the UK) representing a combined audience of over 40 million fans.

We have also recently announced a $10m global Google.org commitment to media literacy projects. We have already supported media literacy projects in the U.K. and in Finland and we are going to support more in the months to come.[6]

---

[5] beinternetawesome.withgoogle.com
[6] In Finland we have supported The Mannerheim League for Child Welfare and Save the Children; in the U.K. we have supported The Student View to promote media literacy.

→ **Commitment #11- Signatories commit to encourage market uptake of tools that help consumers understand why they are seeing particular advertisements:**

We provide tools to our users to help them better understand why they are seeing an ad in Google's network. On Google Services like Search or YouTube, users can click on Why This Ad. On non-Google websites and apps that partner with Google to show ads, users can click on the Ad Choices icon. Users can also edit their preferences to control the kinds of ads they see, block certain ads, and give us feedback on ads that they think are inappropriate. We are also giving control to our users on their ads settings and preferences via Google Account (1.6 billion unique visits in 2016 and just under 2 billion in 2017).

How to access tools that help users understand why they are seeing an ad:

On Google services, like Google Search, Youtube, or Gmail: Click ⓘ , then "Why This Ad".

On Non-Google websites and apps that partner with Google to show ads: Click AdChoices ▷ .

We also help users understand how advertising works on Google by providing details and examples in our "How We Make Money With Advertising" website, available at https://howwemakemoney.withgoogle.com/.

What to look for in subsequent reports
We will continue to inform the European Commission on the progress of our efforts on fact-checking, trust and credibility signals, media literacy, and elevating authoritative information. We are developing partnerships with European fact-checking organizations ahead of the elections that we will share details on in due course.

---

5. EMPOWERING THE RESEARCH COMMUNITY

Signatories to the Code of Practice agreed to the following Commitments:

12. Relevant Signatories commit to support good faith independent efforts to track Disinformation and understand its impact, including the independent network of factcheckers facilitated by the European Commission upon its establishment. This will include sharing privacy protected datasets, undertaking joint research, or otherwise partnering with academics and civil society organizations if relevant and possible.

13. Relevant Signatories commit not to prohibit or discourage good faith research into Disinformation and political advertising on their platforms.

14. Relevant Signatories commit to encourage research into Disinformation and political advertising.

15. Relevant Signatories commit to convene an annual event to foster discussions within academia, the fact-checking community and members of the value chain.

How we are complying with these Commitments by end of 2018:

Commitment #12 - Supporting good faith independent efforts to track Disinformation and understand its impact. In addition to the work outlined as part of the reporting on commitment #7 to

collaborate with fact-checkers, we run a number of ongoing projects to collaborate with fact-checkers and researchers who explore the propagation of Disinformation in the European Union and beyond:

- *Collaboration with the International Fact-Checking Network*: we have partnered with Poynter's International Fact-Checking Network (IFCN), a nonpartisan organization whose Code of Principles for fact check organizations gathers signatories from multiple EU Member States. Our partnership with IFCN focuses on three key areas with a global point of view: helping train more fact-checkers around the world, translating the IFCN's Code of Principles in ten languages, and providing tools and training for free to the fact-checking community. We look forward to exploring how we can collaborate with the European Network of Fact-Checkers.
- *Making it easier for researchers to explore the corpus of fact-checks around the world*: with the DataCommons project, we have begun to work on a "fact-check explorer" which will ultimately let researchers and fact-checkers explore the body of fact-check content that our systems have observed around the world. The project is currently in a test phase, and we hope to have more to announce in 2019.
- *Funding research*: We support the work of researchers who explore the issues of disinformation and trust in journalism, by supporting research at organizations like First Draft, the Oxford University's Reuters Institute, Michigan University's Quello Center, and more. Furthermore, our own research teams work closely with academics around the world on emerging issues related to disinformation, such as the potential threats raised by synthetic media (also known as "deep fakes")
- *Engaging with researchers who explore the propagation and impact of disinformation*: we receive frequent inquiries from academic researchers who investigate these issues as they seek to better understand our products and policies or have questions with regards to data they've collected as part of their independent research efforts. We respond to these requests as frequently as the availability of our teams permit, and aim to inform the work of these researchers to the best of our ability. Where possible, we make it easier for researchers to access the information that they'd otherwise ask of us, by publicizing important information like the functioning of our Search ranking algorithms (see www.google.com/search/howsearchworks) or the Search Quality Rater Guidelines which outline in great details the goals of Search as well as the means by which we ask evaluators to assess the quality of our search results.
- Google News Lab, a team within the Google News Initiative whose mission is to collaborate with journalists and entrepreneurs to drive innovation in news, is going to host verification training workshops in the EU member states - we have recently organized one in Denmark and there are more being scheduled.

Commitment #13. Relevant Signatories commit not to prohibit or discourage good faith research into Disinformation and political advertising on their platforms. Google and YouTube do not prohibit or discourage such good faith research.

Commitment #14. Relevant Signatories commit to encourage research into Disinformation and political advertising. As mentioned as part of our reporting on commitment #12, we currently fund research into disinformation and political advertising, and we will explore additional opportunities to expand our efforts in 2019.

Commitment #15. Relevant Signatories commit to convene an annual event to foster discussions within academia, the fact-checking community and members of the value chain. Google and YouTube have organized events with all of these communities in 2018, notably including convenings led by the Google News Initiative to hear from these groups which products and policy

changes they believe would be most helpful coming from our services. We will continue such efforts in 2019.

What to look for in subsequent reports
We will continue to keep the Commission informed on the progress of ongoing projects to support the research and fact-checking communities, such as the Fact-Check Explorer, as well as of major events and product or policy changes that would benefit the European fact-checking and research communities.