

Subscription Document for Expert Forum Association

Contents

II. Scrutiny of Ad Placements	4
III. Political Advertising.....	Error! Bookmark not defined.
IV. Integrity of Services	6
V. Empowering Users	7
VI. Empowering the Research Community	9
VIII. Transparency Centre.....	12
IX. Permanent Task-force.....	12
X. Monitoring of the Code	14

Subscription Document

Name of the Signatory

[Expert Forum Association]

About the Signatory

[Provide a description of the Organisation and of the relevant products, activities and services it offers, which are covered by the listed commitments and measures.]

Expert Forum (EFOR) is a think tank based in Bucharest, set up by well-known experts in public policy and public governance reform. Expert Forum members have been involved in the most important evaluations of institutional reforms in the public administration and have analyzed the policy process in recent years in Romania and neighboring countries (particularly in the Western Balkans and Moldova), in collaboration with the European Commission, Council of Europe, World Bank and United Nations Development Programme.

EFOR is uniquely positioned as an election-monitoring NGO that works on political transparency and monitoring digital disinformation. Our motivation to join the Code of Conduct on Disinformation is connected to recent developments in Romania. Expert Forum is the only Romanian think tank that had an **integrated nationwide election observation effort, beyond the election day, focusing on: disinformation; monitoring of electoral legislation; party and campaign financing; and observation during the election day**. We led regional NGO's and provided a voter information platform, trainings for independent observers in the voting station, and a call-center for citizens.

. Votcorect.ro, is a comprehensive platform that provides voters with accurate electoral information, facilitates the reporting of irregularities, and supports independent election observers. This initiative builds on EFOR's extensive experience in election monitoring, dating back to 2014, and aims to engage civil society in protecting democratic processes.

Expert Forum is one of the main think tanks in Romania that is doing proactive monitoring of online trends and influence operations. EFOR's research was used in November 2024 by the National Audio-Visual Council to file a request to the EU Commission to investigate TikTok's role in allowing the dissemination of a coordinated network of accounts to manipulate voting behavior.

Expert Forum is part of the consultation forum of experts that advises ANCOM - Romania's Digital Service Coordinator that implements the Digital Services Act and took part in consultations with the European Commission, VLOPS (big platforms like Meta, TikTok).

II. Scrutiny of Ad Placements	
List of adopted commitments and measures¹ <i>[Remove those that do not apply]</i>	Qualitative Reporting Elements and/or Service Level Indicators²

¹ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

² Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

<p><u>Commitment 12</u></p> <p>Relevant Signatories commit to increase oversight of political and issue advertising and constructively assist, as appropriate, in the creation, implementation and improvement of political or issue advertising policies and practices.</p>	<p>Measure 12.1 Measure 12.2 Measure 12.3</p>	<p>QRE: Number of reports shared with regulatory authorities regarding political advertising violations.</p>
<p><u>Commitment 13</u></p> <p>Relevant Signatories agree to engage in ongoing monitoring and research to understand and respond to risks related to Disinformation in political or issue advertising.</p>	<p>Measure 13.1 Measure 13.2 Measure 13.3</p>	<p>QRE: Number of public statements, policy positions, and research papers published on political advertising transparency.</p>
<p>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable):</p> <p>The above commitments are crucial for our mission because:</p> <p>Election Integrity: The commitments on political advertising transparency ensure that EFOR can access necessary data to track and counter disinformation targeting elections in Romania.</p> <p>Election Monitoring Tools: EFOR plans to expand its digital tools, such as BaniPartidelor.ro, to integrate better tracking of political influence operations.</p>		

IV. Integrity of Services	
List of adopted commitments and measures³ <i>[Remove those that do not apply]</i>	Qualitative Reporting Elements and/or Service Level Indicators⁴

³ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

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V. Empowering Users		
List of adopted commitments and measures ⁵ <i>[Remove those that do not apply]</i>		Qualitative Reporting Elements and/or Service Level Indicators ⁶
<u>Commitment 17</u> In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, Relevant Signatories commit to continue and strengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups.	Measure 17.1 Measure 17.2 Measure 17.3	QRE: Number of workshops and training sessions conducted on civic education. SLI: Number of teachers, students, journalists, and civil society members trained through EFOR's civic education initiatives.
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable): Expert Forum has a dedicated civic education and critical thinking program within the <i>School for Democracy</i> platform, with a 10-year history and a network of 120 teachers from Romania and the Republic of Moldova. Over the next three years, we will continue working with civic education teachers, focusing on strengthening civic education in schools. Our work will also continue to engage both young people and teachers. For teachers, we aim to enhance their knowledge of democracy through workshops and specialized programs. We are currently designing a curriculum for teachers centered around democracy and democratic values.		

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VI. Empowering the Research Community		
List of adopted commitments and measures ⁷ <i>[Remove those that do not apply]</i>		Qualitative Reporting Elements and/or Service Level Indicators ⁸
<u>Commitment 29</u> Relevant Signatories commit to conduct research based on transparent methodology and ethical standards, as well as to share datasets, research findings and methodologies with relevant audiences.	Measure 29.1 Measure 29.2 Measure 29.3	QRE: Number of consultations or collaborations with regulatory bodies on disinformation and online political integrity. QRE: Number of public events and workshops conducted on disinformation research and policy. SLI: Number of research outputs (e.g., reports, studies, policy recommendations) produced as a result of these collaborations.
<p>Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable):</p> <p>Expert Forum is one of the main think tanks in Romania that is doing proactive monitoring of online trends and influence operations. EFOR's research was used in November 2024 by the National Audio-Visual Council to file a request to the EU Commission to investigate TikTok's role in allowing the dissemination of a coordinated network of accounts to manipulate voting behavior.</p> <p>Expert Forum is part of the consultation forum of experts that advises ANCOM - Romania's Digital Service Coordinator that implements the Digital Services Act and took part in consultations with the European Commission, VLOPS (big platforms like Meta, TikTok).</p> <p>Data Access for Research: The Code mandates that online platforms share relevant data with vetted researchers, including think tanks like EFOR. This is essential for analyzing foreign influence, coordinated inauthentic behavior, and the impact of disinformation on voter behavior. EFOR has sent an open letter to our Digital Service Coordinator and the European Commission regarding access to data.</p>		

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<https://expertforum.ro/en/dsa-we-need-radical-transparency-in-data-access-romania-democracy-is-at-risk/>

We also published a separate analysis on Romania.

<https://expertforum.ro/en/data-access-election-integrity-lessons-from-online-disruptions/>

- **Algorithmic Accountability:** Ensuring that digital platforms are transparent about how they amplify political content and disinformation aligns with EFOR's work in tracking harmful narratives and manipulation.
- **International Collaboration:** By participating in EU task forces, EFOR can contribute expertise and gain access to structured consultations with decision-makers, ensuring that Romania's specific risks are addressed in EU-wide policies.

Future Plans

- **Expanding Disinformation Monitoring:** EFOR will work towards enhancing online monitoring of election-related disinformation by advocating for stronger implementation of API access and transparent political ad repositories.
- **Stronger Policy Advocacy:** EFOR will push for stricter compliance by platforms with their transparency obligations under the Digital Services Act (DSA).
- **Research Collaboration:** The think tank will engage in pilot data-sharing projects with vetted researchers to investigate disinformation campaigns at the national and regional levels.

VIII. Transparency Centre		
List of adopted commitments and measures⁹ <i>[Remove those that do not apply]</i>		Qualitative Reporting Elements and/or Service Level Indicators¹⁰
<u>Commitment 35</u> Signatories commit to ensure that the Transparency Centre contains all the relevant information related to the implementation of the Code's Commitments and Measures and that this information is presented in an easy-to-understand manner, per service, and is easily searchable.	Measure 35.1 Measure 35.2 Measure 35.3 Measure 35.4 Measure 35.5 Measure 35.6	
<u>Commitment 36</u> Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner	Measure 36.1 Measure 36.2 Measure 36.3	
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable):		

IX. Permanent Task-force

⁹ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

¹⁰ Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

List of adopted commitments and measures ¹¹ <i>[Remove those that do not apply]</i>		Qualitative Reporting Elements and/or Service Level Indicators ¹²
<u>Commitment 37</u> Signatories commit to participate in the Permanent Task-force. The Task-force includes the Signatories of the Code and representatives from EDMO and ERGA. It is chaired by the European Commission and includes representatives of the European External Action Service (EEAS). The Task-force can also invite relevant experts as observers to support its work. Decisions of the Taskforce are made by consensus.	Measure 37.1 Measure 37.2 Measure 37.3 Measure 37.4 Measure 37.5 Measure 37.6	
Provide reasoning for the choice of commitments and measures, as well as future plans (if applicable):		

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¹² Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

X. Monitoring of the Code		
List of adopted commitments and measures ¹³ <i>[Remove those that do not apply]</i>		Qualitative Reporting Elements and/or Service Level Indicators ¹⁴
<u>Commitment 39</u> Signatories commit to provide to the European Commission, within 1 month after the end of the implementation period (6 months after this Code's signature) the baseline reports as set out in the Preamble.		
<u>Commitment 41</u> Signatories commit to work within the Task-force towards developing Structural Indicators and deliver a first set of them within 9 months from the signature of this Code; and to publish an initial measurement alongside their first full report. To achieve this goal, Signatories commit to support their implementation, including the testing and adapting of the initial set of Structural Indicators agreed in this Code. This, in order to assess the effectiveness of the Code in reducing the spread of online disinformation for each of the relevant Signatories, and for the entire online ecosystem in the EU and at Member State level. Signatories will collaborate with relevant actors in that regard, including ERGA and EDMO.	Measure 41.1 Measure 41.2 Measure 41.3	
<u>Commitment 43</u> Signatories commit to produce reports and provide data following the harmonised reporting templates and refined methodology for reporting and data disclosure as agreed in the Task-force.		

¹³ Text of the commitments/measures as per Code of Conduct, or adapted to be more relevant or proportionate.

¹⁴ Each commitment or measure is to be accompanied by either a Qualitative Reporting Element and/or a Service Level Indicator, or to be adapted to be more relevant or proportionate.

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

Full Name(s) and Signature(s) of the authorised representative(s):

Date and place:

Sorin Ioniță, President of Expert Forum

Bucharest, 25.02.2025

