

EU CODE OF PRACTICE ON DISINFORMATION 2022

## **Subscription Document for LinkedIn Ireland Unlimited Company**

**15 January 2025**

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## Subscription Document

### **Name of the Signatory**

LinkedIn Ireland Unlimited Company

NOTE: This subscription document governs the participation of LinkedIn Ireland Unlimited Company in the Code effective as of the signature date hereof. It supersedes and replaces in full all commitments made by or on behalf of LinkedIn in Microsoft's subscription document dated 14 June 2022.

### **About the Signatory**

LinkedIn Ireland Unlimited Company (LinkedIn Ireland)—the provider of LinkedIn's services in the European Union (EU)—has been designated by the European Commission as a Very Large Online Platform (VLOP).

LinkedIn is a real-identity, specific-purpose platform, designed for professionals. It is a networking tool that enables members to establish their professional identities online, connect with other professionals, and build relationships for the purpose of collaborating, learning, and staying informed about industry information and trends. As such, the design and function of the platform are central to its overall risk profile, and shape that risk profile in a few key ways:

- LinkedIn is a real-identity platform, where members must use their real or preferred professional names, and the content they post is visible, for example, to their colleagues, employers, potential future employers, and business partners. Given this audience, members by and large tend to limit their activity to professional areas of interest and expect the content they see to be professional in nature.
- LinkedIn operates under standards of professionalism, which are reflected both in content policies and enforcement, as well as in content prioritization and amplification. LinkedIn's policies bolster a safe, trusted, and professional platform, and LinkedIn strictly enforces them. LinkedIn strives to broadly distribute high-quality content that advances professional conversations on the platform.
- LinkedIn services are tailored toward professionals and businesses and LinkedIn's Professional Community Policies clearly detail what is expected of every member as they post, share and comment on the platform, including that disinformation is not permitted on LinkedIn.

LinkedIn is committed to keeping its platform and services safe, trusted, and professional and to providing transparency to its members, the public, and to regulators. LinkedIn's vision is to create economic opportunity for every member of the global workforce. Its mission is to connect the world's professionals to make them more productive and successful. Members come to LinkedIn to find a job, stay informed, connect with other professionals, and learn new skills. As a real-identity online networking service for professionals to connect and interact with other professionals, LinkedIn has a unique risk profile when compared with many social media platforms. With this in mind, LinkedIn invests heavily in numerous Trust and Safety domains to proactively enhance the safety, security, privacy, and quality of the LinkedIn user experience. Further, as confirmed by LinkedIn's Year One and Year Two Systemic Risk Assessments, the residual risks most relevant to misinformation and disinformation (i.e. those relating to Civic Discourse and Electoral Process, Public Health and Public Security) are categorised as "Low."

LinkedIn Ireland fully supports the objectives of the European Code of Practice on Disinformation (the "Code") and we are committed to actively working with Signatories and the European Commission in the context of this Code to defend against disinformation on the LinkedIn service. LinkedIn generally is not targeted by those seeking to spread disinformation than many other (platform) services falling within the scope of the Code.

To this end, LinkedIn Ireland is hereby signing on to all areas of the Code that are relevant, pertinent and practicable to its service as of the date of subscription. Moreover, LinkedIn Ireland will continually review its commitments and measures as practices and approaches evolve and in view of technological, societal, market and legislative developments, in line with the Code.

| <i>Service name</i> | <i>Description of the service</i>                                |
|---------------------|------------------------------------------------------------------|
| LinkedIn            | Real-identity professional network provided by LinkedIn Ireland. |

| II. Scrutiny of Ad Placements           |                    |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------|--------------------|------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>List of commitments and measures</u> |                    | <u>Subscribed</u><br><br><u>(including indication about which of the signatory's services are subscribed to)</u> | Additional comment including: <ul style="list-style-type: none"> <li>• <b><u>Reason for not subscribing (at the service level)</u></b>, including clarification regarding relevance, pertinence and practicability to a service (including by clearly indicating the relevant service)</li> </ul> [Provide these comments for each commitment/measure as relevant]                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <u>Commitment 1</u>                     | <u>Measure 1.1</u> | No                                                                                                               | LinkedIn is not subscribing to this Measure because it is not proportionate to the risk profile of LinkedIn with regard to disinformation, as evidenced by LinkedIn's annual risk assessments and otherwise, and it would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measure is not a necessary mitigation in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of |

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|  |  |  | <p>mitigations on point, and will continue to evaluate whether this Measure is appropriate within the context of its service.</p> <p>LinkedIn is also not subscribing to this Measure due to at least two concerns about auditability. First, the Measure contains words and phrases that are vague and therefore present audit challenges. For example, the phrases “integrity,” “meaningful,” and “verification” in the Measure are open to interpretation and should depend on an analysis of the totality of the circumstances. The control framework required by the audit, however, requires explicit limits without regard to such circumstances. For example, when interpreting “without undue delay” in the text of the DSA, LinkedIn had to assign a time limit for all cases even though “undue” delay is dependent upon circumstances. The same amount of delay can be “due” or “undue” depending on the circumstances (e.g., exigent circumstances, like a natural disaster, can excuse certain amounts of delay). In other words, the mandates of the audit framework remove the very flexibility that the Code creates for platforms with differing risk profiles. Second, LinkedIn’s auditor considers immaterial issues when conducting its analysis, which creates a perfection standard as it relates to DSA compliance. As further explained in Section D of LinkedIn’s Audit Implementation Report, all</p> |
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|  |                    |    | <p>stakeholders need further guidance from the European Commission to ensure that audits properly address risk. Currently, objectively insignificant issues involving minor infractions with no practical real-world harm result in negative findings, which then lead to auditor recommendations. Since all auditor recommendations must be addressed by the Management Body per DSA Article 41, such recommendations undercut the risk determinations in LinkedIn's Systemic Risk Assessment. While LinkedIn is committed to addressing disinformation, and will continue to abide by the spirit of the Measure, it cannot subscribe to the Measure because the audit process will undercut LinkedIn's ability to address actual risk.</p> |
|  | <u>Measure 1.2</u> | No | <p>LinkedIn is not subscribing to this Measure because it is not proportionate to the risk profile of LinkedIn with regard to disinformation, as evidenced by LinkedIn's annual risk assessments and otherwise, and it would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measure is not a necessary mitigation in addition to those currently in effect. LinkedIn will continue to assess</p>                                                                                                                                                                                                 |

|  |                    |                      |                                                                                                                                                                                                                                                                                                                                                                                                                        |
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|  |                    |                      | disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether this Measure is appropriate within the context of its service. |
|  | <u>Measure 1.3</u> | Yes                  |                                                                                                                                                                                                                                                                                                                                                                                                                        |
|  | <u>Measure 1.4</u> | Not applicable (N/A) | This Measure is not applicable to LinkedIn as it does not buy advertising on behalf of others, including advertisers and agencies.                                                                                                                                                                                                                                                                                     |
|  | <u>Measure 1.5</u> | N/A                  | This Measure is not applicable to LinkedIn, as LinkedIn does not offer a content monetisation or an ad revenue share program to members. Thus, no member content is monetised or demonetised, and there is no ability for a member publishing disinformation on LinkedIn to collect advertising revenue share.                                                                                                         |
|  | <u>Measure 1.6</u> | N/A                  | This Measure is not applicable to LinkedIn as three of the four associated QREs apply to types of entities which LinkedIn is not (e.g., a brand safety tool provider or a ratings service).                                                                                                                                                                                                                            |

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| <u>Commitment 2</u><br><br>Relevant Signatories participating in advertising commit to prevent the misuse of advertising systems to disseminate misinformation or disinformation in the form of advertising messages. | <u>Measure 2.1</u> | Yes |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                                                                                                                       | <u>Measure 2.2</u> | N/A | <p>This Measure is not applicable to LinkedIn because LinkedIn removes, rather than labels, disinformation from its service. Accordingly, LinkedIn implements disinformation-related risk mitigations that go beyond (i.e., further limit user exposure to identified disinformation) those contemplated by this Measure. LinkedIn will continue to evaluate the effectiveness of such content removal mitigations as part of its systemic risk assessment efforts under DSA Article 34.</p> <p>Even if this Measure were applicable to LinkedIn, it is not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn’s annual risk assessments and otherwise, and it would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34.</p> |
|                                                                                                                                                                                                                       | <u>Measure 2.3</u> | Yes |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                                                                                                                       | <u>Measure 2.4</u> | Yes |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <u>Commitment 3</u>                                                                                                                                                                                                   | <u>Measure 3.1</u> | No  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

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| Relevant Signatories involved in buying, selling and placing digital advertising commit to exchange best practices and strengthen cooperation with relevant players, expanding to organisations active in the online monetisation value chain, such as online e-payment services, e-commerce platforms and relevant crowd-funding/donation systems, with the aim to increase the effectiveness of scrutiny of ad placements on their own services.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <u>Measure 3.2</u> | No |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <u>Measure 3.3</u> | No |  |
| <p><b>Reasons for <i>not subscribing to Commitment 3</i> (if applicable):</b></p> <p>LinkedIn is not subscribing to the Measures in this Commitment because they are not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn’s annual risk assessments and otherwise, and would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Although LinkedIn conducts certain activity contemplated by this Commitment at a broader service level, LinkedIn’s risk profile regarding disinformation does not support implementing such measures as framed within this Commitment. Accordingly, the Measures in this Commitment are not necessary mitigations in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether the Measures in this Commitment are appropriate within the context of its service.</p> <p>LinkedIn is also not subscribing to the Measures in this Commitment due to at least two concerns about auditability. First, the Commitment contains words and phrases that are vague and therefore present audit challenges. For example, the phrases “best practices” and “increase the effectiveness of scrutiny” in the Commitment are open to interpretation and should depend on an analysis of the totality of the circumstances. The control framework required by the audit, however, requires explicit limits without regard to such circumstances. For example, when interpreting “without undue delay” in the text of the DSA, LinkedIn had to assign a time limit for all cases even though “undue” delay is dependent upon circumstances. The same amount of delay can be “due” or “undue” depending on the circumstances (e.g., exigent circumstances, like a natural disaster, can excuse certain amounts of delay). In other words, the mandates of the audit framework remove the very flexibility that the Code</p> |                    |    |  |

creates for platforms with differing risk profiles. Second, LinkedIn's auditor considers immaterial issues when conducting its analysis, which creates a perfection standard as it relates to DSA compliance. As further explained in Section D of LinkedIn's Audit Implementation Report, all stakeholders need further guidance from the European Commission to ensure that audits properly address risk. Currently, objectively insignificant issues involving minor infractions with no practical real-world harm result in negative findings, which then lead to auditor recommendations. Since all auditor recommendations must be addressed by the Management Body per DSA Article 41, such recommendations undercut the risk determinations in LinkedIn's Systemic Risk Assessment. While LinkedIn is committed to addressing disinformation, and will continue to abide by the spirit of the Measures in this Commitment, it cannot subscribe to the Measures in this Commitment because the audit process will undercut LinkedIn's ability to address actual risk.

| III. Political Advertising and Issue-based Advertising                                                                                                                                                                                                                                                                    |                    |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                     |
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| <u>List of adopted commitments and measures</u>                                                                                                                                                                                                                                                                           |                    | <u>Subscribed</u><br><br><u>(including indication about which of the signatory's services are subscribed to)</u> | Additional comment including:<br><br><ul style="list-style-type: none"> <li><u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance, pertinence and practicability to a service (including by clearly indicating the relevant service)</li> </ul><br>[Provide these comments for each commitment/measure as relevant] |
| <u>Commitment 4</u><br><br>Relevant Signatories commit to adopt a common definition of “political and issue advertising”.                                                                                                                                                                                                 | <u>Measure 4.1</u> | N/A                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                                                                                                                           | <u>Measure 4.2</u> | N/A                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Reasons for not subscribing to Commitment 4 (if applicable):</b><br><br>Commitment 4 is no longer relevant as Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising (which established this definition) has been adopted. |                    |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                     |

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| <p><u>Commitment 5</u></p> <p>Relevant Signatories commit to apply a consistent approach across political and issue advertising on their services and to clearly indicate in their advertising policies the extent to which such advertising is permitted or prohibited on their services</p> | <p><u>Measure 5.1</u></p> | <p>Yes</p> | <p>As of the signature date of this document, LinkedIn prohibits political advertising that may be in scope of this Commitment, including ads advocating for or against a particular candidate, party, or ballot proposition or otherwise intended to influence an election outcome; ads fundraising for or by political candidates, parties, political action committees or similar organizations, or ballot propositions; and ads exploiting a sensitive political issue even if the advertiser has no explicit political agenda.</p> |
| <p><u>Commitment 6</u></p> <p>Relevant Signatories commit to make political or issue ads clearly labelled and distinguishable as paid-for content in a way that allows users to understand that the content displayed contains political or issue advertising</p>                             | <p><u>Measure 6.1</u></p> | <p>N/A</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                                                                                                                                                                                               | <p><u>Measure 6.2</u></p> | <p>N/A</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                                                                                                                                                                                               | <p><u>Measure 6.3</u></p> | <p>N/A</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                                                                                                                                                                                               | <p><u>Measure 6.4</u></p> | <p>N/A</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|                                                                                                                                                                                                                                                                                               | <p><u>Measure 6.5</u></p> | <p>N/A</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p><b>Reasons for <i>not subscribing to Commitment 6</i> (if applicable):</b></p> <p>Commitment 6 is not applicable to LinkedIn as it does not allow political advertising (as set out in more detail under Measure 5.1).</p>                                                                 |                           |            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

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| <u>Commitment 7</u><br><br>Relevant Signatories commit to put proportionate and appropriate identity verification systems in place for sponsors and providers of advertising services acting on behalf of sponsors placing political or issue ads. Relevant signatories will make sure that labelling and user-facing transparency requirements are met before allowing placement of such ads. | <u>Measure 7.1</u> | N/A |  |
|                                                                                                                                                                                                                                                                                                                                                                                                | <u>Measure 7.2</u> | N/A |  |
|                                                                                                                                                                                                                                                                                                                                                                                                | <u>Measure 7.3</u> | Yes |  |
|                                                                                                                                                                                                                                                                                                                                                                                                | <u>Measure 7.4</u> | N/A |  |
| <b>Reasons for not subscribing to Commitment 7 (if applicable):</b><br><br>Commitment 7 is not applicable to LinkedIn as it does not allow political advertising (as set out in more detail under Measure 5.1), except for Measure 7.3 as it relates to reporting ads that may violate LinkedIn's policies.                                                                                    |                    |     |  |
| <u>Commitment 8</u><br><br>Relevant Signatories commit to provide transparency information to users about the political or issue ads they see on their service.                                                                                                                                                                                                                                | <u>Measure 8.1</u> | N/A |  |
|                                                                                                                                                                                                                                                                                                                                                                                                | <u>Measure 8.2</u> | N/A |  |
| <b>Reasons for not subscribing to Commitment 8 (if applicable):</b><br><br>Commitment 8 is not applicable to LinkedIn as it does not allow political advertising (as set out in more detail under Measure 5.1).                                                                                                                                                                                |                    |     |  |

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| <u>Commitment 9</u><br><br>Relevant Signatories commit to provide users with clear, comprehensible, comprehensive information about why they are seeing a political or issue ad.                                                                                                                                                                                                        | <u>Measure 9.1</u>  | N/A |  |
|                                                                                                                                                                                                                                                                                                                                                                                         | <u>Measure 9.2</u>  | N/A |  |
| <b>Reasons for <i>not subscribing to Commitment 9</i> (if applicable):</b><br><br>Commitment 9 is not applicable to LinkedIn as it does not allow political advertising (as set out in more detail under Measure 5.1).                                                                                                                                                                  |                     |     |  |
| <u>Commitment 10</u><br><br>Relevant Signatories commit to maintain repositories of political or issue advertising and ensure their currentness, completeness, usability and quality, such that they contain all political and issue advertising served, along with the necessary information to comply with their legal obligations and with transparency commitments under this Code. | <u>Measure 10.1</u> | N/A |  |
|                                                                                                                                                                                                                                                                                                                                                                                         | <u>Measure 10.2</u> | N/A |  |
| <b>Reasons for <i>not subscribing to Commitment 10</i> (if applicable):</b><br><br>Commitment 10 is not applicable to LinkedIn as it does not allow political advertising (as set out in more detail under Measure 5.1).                                                                                                                                                                |                     |     |  |

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| <u>Commitment 11</u><br><br>Relevant Signatories commit to provide application programming interfaces (APIs) or other interfaces enabling users and researchers to perform customised searches within their ad repositories of political or issue advertising and to include a set of minimum functionalities as well as a set of minimum search criteria for the application of APIs or other interfaces. | <u>Measure 11.1</u> | N/A |  |
|                                                                                                                                                                                                                                                                                                                                                                                                            | <u>Measure 11.2</u> | N/A |  |
|                                                                                                                                                                                                                                                                                                                                                                                                            | <u>Measure 11.3</u> | N/A |  |
|                                                                                                                                                                                                                                                                                                                                                                                                            | <u>Measure 11.4</u> | N/A |  |
| <b>Reasons for <i>not subscribing</i> to Commitment 11 (if applicable):</b><br><br>Commitment 11 is not applicable to LinkedIn as it does not allow political advertising (as set out in more detail under Measure 5.1).                                                                                                                                                                                   |                     |     |  |
| <u>Commitment 12</u><br><br>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.                                                                                                                                      | <u>Measure 12.1</u> | N/A |  |
|                                                                                                                                                                                                                                                                                                                                                                                                            | <u>Measure 12.2</u> | N/A |  |
|                                                                                                                                                                                                                                                                                                                                                                                                            | <u>Measure 12.3</u> | N/A |  |
| <b>Reasons for <i>not subscribing</i> to Commitment 12 (if applicable):</b><br><br>Commitment 12 is not applicable to LinkedIn because it is aimed specifically at civil society organisations.                                                                                                                                                                                                            |                     |     |  |

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| <u>Commitment 13</u><br><br>Relevant Signatories agree to engage in ongoing monitoring and research to understand and respond to risks related to Disinformation in political or issue advertising.                      | <u>Measure 13.1</u> | N/A |  |
|                                                                                                                                                                                                                          | <u>Measure 13.2</u> | N/A |  |
|                                                                                                                                                                                                                          | <u>Measure 13.3</u> | N/A |  |
| <b>Reasons for <i>not subscribing to Commitment 13</i> (if applicable):</b><br><br>Commitment 13 is not applicable to LinkedIn as it does not allow political advertising (as set out in more detail under Measure 5.1). |                     |     |  |

| IV. Integrity of Services                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                     |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                     |
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| <u>List of adopted commitments and measures</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                     | <u>Subscribed</u><br><br><u>(including indication about which of the signatory's services are subscribed to)</u> | Additional comment including:<br><br><ul style="list-style-type: none"> <li><u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance, pertinence and practicability to a service (including by clearly indicating the relevant service)</li> </ul><br>[Provide these comments for each commitment/measure as relevant] |
| <u>Commitment 14</u><br><br>In order to limit impermissible manipulative behaviours and practices across their services, Relevant Signatories commit to put in place or further bolster policies to address both misinformation and disinformation across their services, and to agree on a cross-service understanding of manipulative behaviours, actors and practices not permitted on their services.<br><br>Such behaviours and practises, which should periodically be reviewed in light with the latest evidence on the conducts and TTPs employed by malicious actors, such as the AMITT Disinformation | <u>Measure 14.1</u> | No                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <u>Measure 14.2</u> | No                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <u>Measure 14.3</u> | No                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                     |

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| <p>Tactics, Techniques and Procedures Framework, include:</p> <ul style="list-style-type: none"> <li>- The creation and use of fake accounts, account takeovers and bot-driven amplification,</li> <li>- Hack-and-leak operations,</li> <li>- Impersonation,</li> <li>- Malicious deep fakes,</li> <li>- The purchase of fake engagements,</li> <li>- Non-transparent paid messages or promotion by influencers,</li> <li>- The creation and use of accounts that participate in coordinated inauthentic behaviour,</li> <li>- User conduct aimed at artificially amplifying the reach or perceived public support for disinformation.</li> </ul>                                                                                                                                                                                           |  |  |  |
| <p><b>Reasons for <i>not subscribing</i> to Commitment 14 (if applicable):</b></p> <p>LinkedIn is not subscribing to the Measures in this Commitment because they are not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn’s annual risk assessments and otherwise, and would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Namely, this Commitment (including the TTPs) would require LinkedIn to compile specific metrics that do not align with how LinkedIn is used and its risk profile, and that would not mitigate disinformation risk on LinkedIn in a material way. Accordingly, the Measures in this Commitment are not necessary mitigations</p> |  |  |  |

in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether the Measures in this Commitment are appropriate within the context of its service.

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| <u>Commitment 15</u><br><br>Relevant Signatories that develop or operate AI systems and that disseminate AI-generated and manipulated content through their services (e.g. deepfakes) commit to take into consideration the transparency obligations and the list of manipulative practices prohibited under the proposal for Artificial Intelligence Act.                                                                                  | <u>Measure 15.1</u> | Yes |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                             | <u>Measure 15.2</u> | Yes |  |
| <u>Commitment 16</u><br><br>Relevant Signatories commit to operate channels of exchange between their relevant teams in order to proactively share information about cross-platform influence operations, foreign interference in information space and relevant incidents that emerge on their respective services, with the aim of preventing dissemination and resurgence on other services, in full compliance with privacy legislation | <u>Measure 16.1</u> | Yes |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                             | <u>Measure 16.2</u> | Yes |  |

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| and with due consideration for security and human rights risks. |  |  |  |
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| V. Empowering Users                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                     |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                     |
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| <u>List of adopted commitments and measures</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                     | <u>Subscribed</u><br><br><u>(including indication about which of the signatory's services are subscribed to)</u> | Additional comment including:<br><br><ul style="list-style-type: none"> <li><u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance, pertinence and practicability to a service (including by clearly indicating the relevant service)</li> </ul><br>[Provide these comments for each commitment/measure as relevant] |
| <u>Commitment 17</u><br><br>In light of the European Commission's initiatives in the area of media literacy, including the new Digital Education Action Plan, Relevant Signatories commit to continue and strengthen their efforts in the area of media literacy and critical thinking, also with the aim to include vulnerable groups                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <u>Measure 17.1</u> | No                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <u>Measure 17.2</u> | No                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <u>Measure 17.3</u> | No                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Reasons for <i>not subscribing</i> to Commitment 17 (if applicable):</b><br><br>LinkedIn is not subscribing to the Measures in this Commitment because they are not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments and otherwise, and would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measures in this Commitment are not necessary mitigations in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. |                     |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                     |

LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether the Measures in this Commitment are appropriate within the context of its service.

LinkedIn is also not subscribing to the Commitments in this Measure due to at least two concerns about auditability. First, the Commitment contains words and phrases that are vague and therefore present audit challenges. For example, the phrases “media literacy” and “critical thinking” in the Commitment are open to interpretation and should depend on an analysis of the totality of the circumstances. The control framework required by the audit, however, requires explicit limits without regard to such circumstances. For example, when interpreting “without undue delay” in the text of the DSA, LinkedIn had to assign a time limit for all cases even though “undue” delay is dependent upon circumstances. The same amount of delay can be “due” or “undue” depending on the circumstances (e.g., exigent circumstances, like a natural disaster, can excuse certain amounts of delay). In other words, the mandates of the audit framework remove the very flexibility that the Code creates for platforms with differing risk profiles. Second, LinkedIn’s auditor considers immaterial issues when conducting its analysis, which creates a perfection standard as it relates to DSA compliance. As further explained in Section D of LinkedIn’s Audit Implementation Report, all stakeholders need further guidance from the European Commission to ensure that audits properly address risk. Currently, objectively insignificant issues involving minor infractions with no practical real-world harm result in negative findings, which then lead to auditor recommendations. Since all auditor recommendations must be addressed by the Management Body per DSA Article 41, such recommendations undercut the risk determinations in LinkedIn’s Systemic Risk Assessment. While LinkedIn is committed to addressing disinformation, and will continue to abide by the spirit of the Measures in this Commitment, it cannot subscribe to the Measures in this Commitment because the audit process will undercut LinkedIn’s ability to address actual risk.

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| <p><u>Commitment 18</u></p> <p>Relevant Signatories commit to minimise the risks of viral propagation of misinformation or disinformation by adopting safe design practices as they develop their systems, policies, and features</p> | <p><u>Measure 18.1</u></p> | <p>N/A</p> | <p>This Measure is not applicable to LinkedIn because LinkedIn removes disinformation from its service. In other words, LinkedIn implements disinformation-related risk mitigations that go beyond (i.e., further limit user exposure to identified disinformation) those contemplated by this Commitment. Accordingly, it would not be appropriate or reasonable within the context of DSA Articles 34 and 35 for LinkedIn to take the proscriptive steps described in this</p> |
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|  |                     |     | <p>Measure, which are designed to reduce the prominence of (rather than outright remove) disinformation.</p> <p>Even if this Measure were applicable to LinkedIn, it is not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments and otherwise, and it would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34.</p>                                                                                             |
|  | <u>Measure 18.2</u> | Yes |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|  | <u>Measure 18.3</u> | No  | <p>LinkedIn is not subscribing to this Measure because it is not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments and otherwise, and it would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measure is not a necessary mitigation in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective</p> |

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|  |  |  | <p>mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether this Measure is appropriate within the context of its service.</p> <p>LinkedIn is also not subscribing to this Measure due to at least two concerns about auditability. First, the Measure contains words and phrases that are vague and therefore present audit challenges. For example, the phrase “safe design practices” in the Measure is open to interpretation and should depend on an analysis of the totality of the circumstances. The control framework required by the audit, however, requires explicit limits without regard to such circumstances. For example, when interpreting “without undue delay” in the text of the DSA, LinkedIn had to assign a time limit for all cases even though “undue” delay is dependent upon circumstances. The same amount of delay can be “due” or “undue” depending on the circumstances (e.g., exigent circumstances, like a natural disaster, can excuse certain amounts of delay). In other words, the mandates of the audit framework remove the very flexibility that the Code</p> |
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|  |  |  | <p>creates for platforms with differing risk profiles. Second, LinkedIn's auditor considers immaterial issues when conducting its analysis, which creates a perfection standard as it relates to DSA compliance. As further explained in Section D of LinkedIn's Audit Implementation Report, all stakeholders need further guidance from the European Commission to ensure that audits properly address risk. Currently, objectively insignificant issues involving minor infractions with no practical real-world harm result in negative findings, which then lead to auditor recommendations. Since all auditor recommendations must be addressed by the Management Body per DSA Article 41, such recommendations undercut the risk determinations in LinkedIn's Systemic Risk Assessment. While LinkedIn is committed to addressing disinformation, and will continue to abide by the spirit of the Measure, it cannot subscribe to the Measure because the audit process will undercut LinkedIn's ability to address actual risk.</p> |
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| <u>Commitment 19</u><br><br>Relevant Signatories using recommender systems commit to make them transparent to the recipients regarding the main criteria and parameters used for prioritising or deprioritising information, and provide options to users about recommender systems, and make available information on those options | <u>Measure 19.1</u> | Yes |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|                                                                                                                                                                                                                                                                                                                                      | <u>Measure 19.2</u> | Yes |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <u>Commitment 20</u><br><br>Relevant Signatories commit to empower users with tools to assess the provenance and edit history or authenticity or accuracy of digital content                                                                                                                                                         | <u>Measure 20.1</u> | No  | LinkedIn is not subscribing to this Measure because it is not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments and otherwise, and it would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Rather than allowing LinkedIn to incorporate into its service technology solutions developed by others more appropriately positioned to do so (like C2PA content credentials), the Measure would require LinkedIn to "develop" such solutions. Accordingly, the Measure is not a necessary mitigation in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                     |     | LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether this Measure is appropriate within the context of its service. |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <u>Measure 20.2</u> | Yes |                                                                                                                                                                                                                                   |
| <u>Commitment 21</u><br><br>Relevant Signatories commit to strengthen their efforts to better equip users to identify Disinformation. In particular, in order to enable users to navigate services in an informed way, Relevant Signatories commit to facilitate, across all Member States languages in which their services are provided, user access to tools for assessing the factual accuracy of sources through fact-checks from fact-checking organisations that have flagged potential Disinformation, as well as warning labels from other authoritative sources | <u>Measure 21.1</u> | N/A |                                                                                                                                                                                                                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <u>Measure 21.2</u> | N/A |                                                                                                                                                                                                                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <u>Measure 21.3</u> | N/A |                                                                                                                                                                                                                                   |
| <b>Reason for <i>not subscribing</i> to Commitment 21 (if applicable):</b><br><br>Commitment 21 is not applicable to LinkedIn because LinkedIn removes rather than labels disinformation from its service. Accordingly, LinkedIn implements disinformation-related risk mitigations that go beyond (i.e., further limit user exposure to identified disinformation) those proposed in                                                                                                                                                                                     |                     |     |                                                                                                                                                                                                                                   |

this Commitment. LinkedIn will continue to evaluate the effectiveness of such content removal mitigations as part of its systemic risk assessment efforts under DSA Article 34.

Even if the Measures in this Commitment were applicable to LinkedIn, they are not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn’s annual risk assessments and otherwise, and they would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measures in this Commitment are not necessary mitigations in addition to those currently in effect.

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| <u>Commitment 22</u><br><br>Relevant Signatories commit to provide users with tools to help them make more informed decisions when they encounter online information that may be false or misleading, and to facilitate user access to tools and information to assess the trustworthiness of information sources, such as indicators of trustworthiness for informed online navigation, particularly relating to societal issues or debates of general interest | <u>Measure 22.1</u> | N/A |                                                                                                                              |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <u>Measure 22.2</u> | N/A |                                                                                                                              |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <u>Measure 22.3</u> | N/A |                                                                                                                              |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <u>Measure 22.4</u> | N/A | This measure is aimed specifically at “providers of trustworthiness indicators” and is therefore not applicable to LinkedIn. |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <u>Measure 22.5</u> | N/A | This measure is aimed specifically at “providers of trustworthiness indicators” and is therefore not applicable to LinkedIn. |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <u>Measure 22.6</u> | N/A | This measure is aimed specifically at “providers of trustworthiness indicators” and is therefore not applicable to LinkedIn. |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <u>Measure 22.7</u> | N/A |  |
| <p><b>Reason for <i>not subscribing</i> to Commitment 22 (if applicable):</b></p> <p>Measures 22.4, 22.5 and 22.6 are not applicable to LinkedIn for the reasons specified above. This Commitment is otherwise not applicable to LinkedIn because LinkedIn removes rather than labels disinformation from its service. Accordingly, LinkedIn implements disinformation-related risk mitigations that go beyond (i.e., further limit user exposure to identified disinformation) those proposed in this Commitment. LinkedIn will continue to evaluate the effectiveness of such content removal mitigations as part of its systemic risk assessment efforts under DSA Article 34.</p> <p>Even if the Measures in this Commitment were applicable to LinkedIn, they are not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn’s annual risk assessments and otherwise, and they would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measures in this Commitment are not necessary mitigations in addition to those currently in effect.</p> |                     |     |  |
| <u>Commitment 23</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <u>Measure 23.1</u> | Yes |  |
| Relevant Signatories commit to provide users with the functionality to flag harmful false and/or misleading information that violates Signatories policies or terms of service                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <u>Measure 23.2</u> | Yes |  |
| <u>Commitment 24</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <u>Measure 24.1</u> | Yes |  |
| Relevant Signatories commit to inform users whose content or accounts has been subject to enforcement actions (content/accounts labelled, demoted or otherwise enforced on) taken on the basis of violation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                     |     |  |

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| of policies relevant to this section (as outlined in Measure 18.2), and provide them with the possibility to appeal against the enforcement action at issue and to handle complaints in a timely, diligent, transparent, and objective manner and to reverse the action without undue delay where the complaint is deemed to be founded                                                                                                                               |                     |     |  |
| <u>Commitment 25</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <u>Measure 25.1</u> | N/A |  |
| In order to help users of private messaging services to identify possible disinformation disseminated through such services, Relevant Signatories that provide messaging applications commit to continue to build and implement features or initiatives that empower users to think critically about information they receive and help them to determine whether it is accurate, without any weakening of encryption and with due regard to the protection of privacy | <u>Measure 25.2</u> | N/A |  |
| <b>Reason for <i>not subscribing</i> to Commitment 25 (if applicable):</b><br><br>Commitment 25 is not relevant to LinkedIn.                                                                                                                                                                                                                                                                                                                                          |                     |     |  |

| VI. Empowering the Research Community                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                     |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                            |
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| <u>List of adopted commitments and measures</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                     | <u>Subscribed</u><br><br><u>(including indication about which of the signatory's services are subscribed to)</u> | Additional comment including:<br><br><ul style="list-style-type: none"> <li><b><u>Reason for not subscribing (at the service level)</u></b>, including clarification regarding relevance, pertinence and practicability to a service (including by clearly indicating the relevant service)</li> </ul><br>[Provide these comments for each commitment/measure as relevant] |
| <u>Commitment 26</u><br><br>Relevant Signatories commit to provide access, wherever safe and practicable, to continuous, real-time or near real-time, searchable stable access to non-personal data and anonymised, aggregated, or manifestly-made public data for research purposes on Disinformation through automated means such as APIs or other open and accessible technical solutions allowing the analysis of said data                                                                                                | <u>Measure 26.1</u> | No                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <u>Measure 26.2</u> | No                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <u>Measure 26.3</u> | No                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Reasons for not subscribing to Commitment 26 (if applicable):</b><br><br>LinkedIn is not subscribing to the Measures in this Commitment because they are not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments and otherwise, and would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measures in |                     |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                            |

this Commitment are not necessary mitigations in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether the Measures in this Commitment are appropriate within the context of its service, including in light of DSA Article 40(12).

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| <u>Commitment 27</u><br><br>Relevant Signatories commit to provide vetted researchers with access to data necessary to undertake research on Disinformation by developing, funding, and cooperating with an independent, third-party body that can vet researchers and research proposals | <u>Measure 27.1</u> | No |  |
|                                                                                                                                                                                                                                                                                           | <u>Measure 27.2</u> | No |  |
|                                                                                                                                                                                                                                                                                           | <u>Measure 27.3</u> | No |  |
|                                                                                                                                                                                                                                                                                           | <u>Measure 27.4</u> | No |  |

**Reason for *not subscribing* to Commitment 27 (if applicable):**

LinkedIn is not subscribing to the Measures in this Commitment because they are not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn’s annual risk assessments and otherwise, and would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measures in this Commitment are not necessary mitigations in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether the Measures in this Commitment are appropriate within the context of its service.

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| <u>Commitment 28</u><br><br>Relevant Signatories commit to support good faith research into Disinformation that involve their services | <u>Measure 28.1</u> | Yes |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                                                                        | <u>Measure 28.2</u> | Yes |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                                                                        | <u>Measure 28.3</u> | Yes |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                                                                        | <u>Measure 28.4</u> | No  | LinkedIn is not subscribing to this Measure because it is not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments and otherwise, and it would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measure is not a necessary mitigation in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether this |

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|                                                                                                                                                                                                                               |                     |     | Measure is appropriate within the context of its service. |
| <u>Commitment 29</u><br><br>Relevant Signatories commit to conduct research based on transparent methodology and ethical standards, as well as to share datasets, research findings and methodologies with relevant audiences | <u>Measure 29.1</u> | N/A |                                                           |
|                                                                                                                                                                                                                               | <u>Measure 29.2</u> | N/A |                                                           |
|                                                                                                                                                                                                                               | <u>Measure 29.3</u> | N/A |                                                           |
| <b>Reason for <i>not subscribing</i> to Commitment 29 (if applicable):</b><br><br>Commitment 29 is aimed specifically at the research community and is therefore not applicable to LinkedIn.                                  |                     |     |                                                           |

| VII. Empowering the Fact-checking Community                                                                                                                                                                                                                                                      |                     |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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| <u>List of adopted commitments and measures</u>                                                                                                                                                                                                                                                  |                     | <u>Subscribed</u><br><br><u>(including indication about which of the signatory's services are subscribed to)</u> | Additional comment including: <ul style="list-style-type: none"> <li>• <b><u>Reason for not subscribing (at the service level)</u></b>, including clarification regarding relevance, pertinence and practicability to a service (including by clearly indicating the relevant service)</li> </ul> [Provide these comments for each commitment/measure as relevant]                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <u>Commitment 30</u><br><br>Relevant Signatories commit to establish a framework for transparent, structured, open, financially sustainable, and non-discriminatory cooperation between them and the EU fact-checking community regarding resources and support made available to fact-checkers. | <u>Measure 30.1</u> | No                                                                                                               | LinkedIn is not subscribing to this Measure because it is not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments and otherwise, and it would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measure is not a necessary mitigation in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of |

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|  |                     |    | mitigations on point, and will continue to evaluate whether the Measure is appropriate within the context of its service.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|  | <u>Measure 30.2</u> | No | LinkedIn is not subscribing to this Measure because it is not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments and otherwise, and it would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measure is not a necessary mitigation in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether the Measure is appropriate within the context of its service. |
|  | <u>Measure 30.3</u> | No | LinkedIn is not subscribing to this Measure because it is not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

|  |                     |    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|  |                     |    | and otherwise, and it would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measure is not a necessary mitigation in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether the Measure is appropriate within the context of its service. |
|  | <u>Measure 30.4</u> | No | LinkedIn is not subscribing to this Measure because it is not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments and otherwise, and it would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measure is not a necessary mitigation in addition to those currently in effect. LinkedIn will continue to assess disinformation-related risks on its services and                                                                                                                                                                         |

|                                                                                                                                                                                                                                                |                     |     |                                                                                                                                                                                                                                                                                                                                                                      |
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|                                                                                                                                                                                                                                                |                     |     | implement effective mitigation measures tailored to the specific systemic risks identified by it in accordance with DSA Article 34. LinkedIn is committed to removing disinformation from its platform, has already implemented a range of mitigations on point, and will continue to evaluate whether the Measure is appropriate within the context of its service. |
| <u>Commitment 31</u><br><br>Relevant Signatories commit to integrate, showcase, or otherwise consistently use fact-checkers' work in their platforms' services, processes, and contents; with full coverage of all Member States and languages | <u>Measure 31.1</u> | N/A |                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                                                                                                                                                | <u>Measure 31.2</u> | N/A |                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                                                                                                                                                | <u>Measure 31.3</u> | N/A |                                                                                                                                                                                                                                                                                                                                                                      |
|                                                                                                                                                                                                                                                | <u>Measure 31.4</u> | N/A |                                                                                                                                                                                                                                                                                                                                                                      |

**Reason for *not subscribing* to Commitment 31 (if applicable):**

This Commitment is not applicable to LinkedIn because LinkedIn removes, rather than labels, disinformation from its service. Accordingly, LinkedIn implements disinformation-related risk mitigations that go beyond (i.e., further limit user exposure to identified disinformation) than those contemplated by this Commitment. LinkedIn will continue to evaluate the effectiveness of such content removal mitigations as part of its systemic risk assessment efforts under DSA Article 34.

Even if the Measures in this Commitment were applicable to LinkedIn, they are not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments and otherwise, and they would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measures in this Commitment are not necessary mitigations in addition to those currently in effect.

**Commitment 32**

Relevant Signatories commit to provide fact-checkers with prompt, and whenever possible automated, access to information that is pertinent to help them to maximise the quality and impact of fact-checking, as defined in a framework to be designed in coordination with EDMO and an elected body representative of the independent European fact-checking organisations.

**Measure 32.1**

N/A

**Measure 32.2**

N/A

**Measure 32.3**

N/A

**Reason for *not subscribing* to Commitment 32 (if applicable):**

This Commitment is not applicable to LinkedIn because LinkedIn removes, rather than labels, disinformation from its service. Accordingly, LinkedIn implements disinformation-related risk mitigations that go beyond (i.e., further limit user exposure to identified disinformation) those contemplated by this Commitment. LinkedIn will continue to evaluate the effectiveness of such content removal mitigations as part of its systemic risk assessment efforts under DSA Article 34.

Even if the Measures in this Commitment were applicable to LinkedIn, they are not proportionate to the risk profile of LinkedIn with regard to disinformation as evidenced by LinkedIn's annual risk assessments and otherwise, and they would require LinkedIn to implement measures that are not reasonably tailored to mitigate the specific systemic risks identified by LinkedIn in accordance with DSA Article 34. Accordingly, the Measures in this Commitment are not necessary mitigations in addition to those currently in effect.

Commitment 33

Relevant Signatories (i.e. fact-checking organisations) commit to operate on the basis of strict ethical and transparency rules, and to protect their independence.

Measure 33.1

N/A

**Reason for *not subscribing* to Commitment 33 (if applicable):**

Commitment 33 is aimed specifically at fact-checking organisations and therefore not applicable to LinkedIn.

| VIII. Transparency Centre                                                                                                                                                                                                |                     |                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>List of adopted commitments and measures</u>                                                                                                                                                                          |                     | <u>Subscribed</u><br><br>(including indication about which of the signatory's services are subscribed to) | Additional comment including:<br><br><ul style="list-style-type: none"> <li><u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance, pertinence and practicability to a service (including by clearly indicating the relevant service)</li> </ul><br>[Provide these comments for each commitment/measure as relevant] |
| <u>Commitment 34</u><br><br>To ensure transparency and accountability around the implementation of this Code, Relevant Signatories commit to set up and maintain a publicly available common Transparency Centre website | <u>Measure 34.1</u> | Yes                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                          | <u>Measure 34.2</u> | Yes                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                          | <u>Measure 34.3</u> | Yes                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                          | <u>Measure 34.4</u> | Yes                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                          | <u>Measure 34.5</u> | Yes                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                     |
| <u>Commitment 35</u>                                                                                                                                                                                                     | <u>Measure 35.1</u> | Yes                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                     |
|                                                                                                                                                                                                                          | <u>Measure 35.2</u> | Yes                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                     |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |                     |     |                                                                                                                   |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-----|-------------------------------------------------------------------------------------------------------------------|
| Signatories commit to ensure that the Transparency Centre contains all the relevant information related to the implementation of the Code's Commitments and Measures and that this information is presented in an easy-to-understand manner, per service, and is easily searchable.                                                                                                                                                                                                                                                                                 | <u>Measure 35.3</u> | Yes |                                                                                                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <u>Measure 35.4</u> | Yes |                                                                                                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <u>Measure 35.5</u> | No  | LinkedIn is not subscribing to this Measure as compliance with its requirements is not within LinkedIn's control. |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <u>Measure 35.6</u> | Yes |                                                                                                                   |
| <u>Commitment 36</u><br><br>Signatories commit to updating the relevant information contained in the Transparency Centre in a timely and complete manner                                                                                                                                                                                                                                                                                                                                                                                                            | <u>Measure 36.1</u> | N/A |                                                                                                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <u>Measure 36.2</u> | No  |                                                                                                                   |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | <u>Measure 36.3</u> | No  |                                                                                                                   |
| <b>Reason for <i>not subscribing</i> to Commitment 36 (if applicable):</b><br><br>LinkedIn is not subscribing to this Commitment because LinkedIn already updates users of terms changes per DSA Article 14 and, to the extent relevant, refers to such updates in its reports on the Code. Further, this Commitment is not proportionate to the risk profile of LinkedIn with regard to disinformation and as evidenced by LinkedIn's annual risk assessments and otherwise, and is therefore not a necessary mitigation in addition to those currently in effect. |                     |     |                                                                                                                   |

| IX. Task-force                                                                                                                                                                                                                                                                                                                                                                                                                                   |                     |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>List of adopted commitments and measures</u>                                                                                                                                                                                                                                                                                                                                                                                                  |                     | <u>Subscribed</u><br><br><u>(including indication about which of the signatory's services are subscribed to)</u> | Additional comment including:<br><br><ul style="list-style-type: none"> <li><b><u>Reason for not subscribing (at the service level)</u></b>, including clarification regarding relevance, pertinence and practicability to a service (including by clearly indicating the relevant service)</li> </ul><br>[Provide these comments for each commitment/measure as relevant] |
| <u>Commitment 37</u><br><br>Signatories commit to participate in the Permanent Task-force. The Task-force includes the Signatories of the Code and representatives from EDMO and ERGA. It is chaired by the European Commission and includes representatives of the European External Action Service (EEAS). The Task-force can also invite relevant experts as observers to support its work. Decisions of the Taskforce are made by consensus. | <u>Measure 37.1</u> | Yes                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <u>Measure 37.2</u> | Yes                                                                                                              | NOTE: LinkedIn will commit to perform the obligations outlined in this Measure to the extent they pertain to the other Measures to which LinkedIn has subscribed under this Subscription Document and in a manner and level that is proportional to LinkedIn's risk profile with respect to disinformation.                                                                |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <u>Measure 37.3</u> | Yes                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <u>Measure 37.4</u> | Yes                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                            |

|  |                     |     |  |
|--|---------------------|-----|--|
|  | <u>Measure 37.5</u> | Yes |  |
|  | <u>Measure 37.6</u> | Yes |  |

| X. Monitoring Framework                                                                                                                               |                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <u>List of adopted commitments and measures</u>                                                                                                       | <u>Subscribed</u><br><br><u>(including indication about which of the signatory's services are subscribed to)</u> | Additional comment including:<br><br><ul style="list-style-type: none"> <li>• <u>Reason for not subscribing (at the service level)</u>, including clarification regarding relevance, pertinence and practicability to a service (including by clearly indicating the relevant service)</li> </ul><br>[Provide these comments for each commitment/measure as relevant] |
| <u>Commitment 38</u><br><br>The Signatories commit to dedicate adequate financial and human resources and put in place appropriate internal processes | Yes                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                       |

|                                                                                                                                                                                                                                                                                                                                                                 |                     |     |                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-----|-----------------------------------------------------------------------------------------------------|
| to ensure the implementation of their commitments under the Code.                                                                                                                                                                                                                                                                                               |                     |     |                                                                                                     |
| <u>Commitment 39</u><br><br>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.                                                                                                                         | N/A                 |     |                                                                                                     |
| <b>Reasons for <i>not subscribing to Commitment 39</i> (if applicable):</b><br><br>This Commitment is no longer relevant as it relates to the baseline report.                                                                                                                                                                                                  |                     |     |                                                                                                     |
| <u>Commitment 40</u><br><br>Signatories commit to provide regular reporting on Service Level Indicators (SLIs) and Qualitative Reporting Elements (QREs). The reports and data provided should allow for a thorough assessment of the extent of the implementation of the Code’s Commitments and Measures by each Signatory, service and at Member State level. | <u>Measure 40.1</u> | Yes |                                                                                                     |
|                                                                                                                                                                                                                                                                                                                                                                 | <u>Measure 40.2</u> | N/A | This Measure applies to non-VLOP signatories and is therefore not applicable to LinkedIn as a VLOP. |
|                                                                                                                                                                                                                                                                                                                                                                 | <u>Measure 40.3</u> | Yes |                                                                                                     |
|                                                                                                                                                                                                                                                                                                                                                                 | <u>Measure 40.4</u> | Yes |                                                                                                     |
|                                                                                                                                                                                                                                                                                                                                                                 | <u>Measure 40.5</u> | Yes |                                                                                                     |
|                                                                                                                                                                                                                                                                                                                                                                 | <u>Measure 40.6</u> | Yes |                                                                                                     |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                     |     |  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|-----|--|
| <u>Commitment 41</u><br><br>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 | <u>Measure 41.1</u> | N/A |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <u>Measure 41.2</u> | No  |  |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <u>Measure 41.3</u> | No  |  |
| <b>Reason for <i>not subscribing</i> to Commitment 41 (if applicable):</b><br><br>This Commitment is no longer relevant as it relates to activity designed to set up and establish the Structural Indicators, which has already occurred. To the extent the Commitment contains ongoing obligations, LinkedIn is not subscribing because it is not proportionate to the risk profile of LinkedIn with regard to disinformation and as evidenced by LinkedIn's annual risk assessments and otherwise, and is therefore not a necessary mitigation in addition to those currently in effect.                                                                                                                                                                                    |                     |     |  |
| <u>Commitment 42</u><br><br>Relevant Signatories commit to provide, in special situations like elections or crisis, upon request of the European Commission, proportionate and appropriate information and data, including ad-hoc specific reports and specific chapters within the regular monitoring, in accordance with the rapid response system established by the Task-force                                                                                                                                                                                                                                                                                                                                                                                            | Yes                 |     |  |

|                                                                                                                                                                                                                              |            |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| <p><u>Commitment 43</u></p> <p>Signatories commit to produce reports and provide data following the harmonised reporting templates and refined methodology for reporting and data disclosure as agreed in the Task-force</p> | <p>Yes</p> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|

*Signature*

*Date*

15 January 2025