

CoC Disinformation Application

Guidelines to apply:

- To this end, signatories that are not Very Large Online Platforms have the option to identify in the subscription document measures proportionate and appropriate to their services that they will implement to fulfil the Commitments subscribed to, and/or a plan to achieve over time full implementation of the measures set out in the Code for the Commitments concerned. In such cases, Signatories concerned shall identify the Qualitative Reporting Elements (QRE) and Service Level Indicators (SLI) they will provide regarding these Measures.
- The Signatories recognise the need to cooperate with the European Commission in assessing the reporting on the functioning of the Code, including by making appropriate information available upon reasonable request and by responding to the European Commission's questions and consultations
- Additional signatories may sign the Code at any time. To this end, candidate signatories must present their activities to the Task-force, along with the Commitments and Measures that they intend to sign up under the Code, in line with the principles set out in this Preamble
- Signatories will implement the Commitments and the Measures to which they have signed up within six months after signature of the Code. **Within seven months of signature, the Signatories will provide the European Commission with baseline reports detailing how they have implemented their Commitments under the Code and provide the Qualitative Reporting Elements (QREs) and Service Level Indicators (SLIs), as they stand one month after the implementation -** recognising that the baseline report will be the very first report provided by the Signatories' and as such may require improvements, and that Signatories' reports may become more detailed over time. The first reporting should also include a comparison between the measures in place under the previous Code to the measures taken to implement the new Code.
- To facilitate their participation in the Code, Signatories that provide services that do not qualify as Very Large Online Platforms according to the Digital Services Act are encouraged to subscribe to Commitments that are relevant to their services and to implement them through measures that are proportionate in light of the size and nature of their services and the resources applicable to them. These signatories can use the simplified subscription document and the relevant supporting document.
- *Each commitment / measure to be accompanied by either a Qualitative Reporting Element and/or quantitative Service Level Indicator as per Code of Practice or adapted to be more relevant or proportionate*

contact: CNECT-COPTASK-FORCE@ec.europa.eu

Subscription Document for opsci.ai (research organisation)

Name of the Signatory

opsci.ai

(Legal name: OPINIONSCIENCE)

About the Signatory

Opsci.ai develops advanced AI-powered data processing methodologies for opinion analysis, risk assessment, and innovation benefiting the common good. We:

- Decipher opinion to inform stakeholders in debates
- Analyse information risks to better protect ourselves
- Support the development of AI projects for good

Therefore, **commitments and measures selected around three areas relate to three main areas:**

- Fighting disinformation
- Supporting public debate ‘sanitizers’
- Contributing to a whole-of-society approach

Solutions or activities provided to counter disinformation:

- Opsci.ai has coordinated the second European Narrative Observatory (project PROMPT).

In this context, opsci.ai has led a consortium in producing research on disinformation narratives, as well as media literacy activities (MOOC) and tools to support journalists, activists, activists in identifying and dissecting disinformation.

More information at: www.disinfo-prompt.eu.

- Opsci.ai will lead a consortium to deliver the third European Narrative Observatory starting April 2026 (project SPINE).
- Opsci.ai has also published a number of studies with leading think tanks on disinformation and narratology (often about climate related issues), some of them with important press coverage.

V. Empowering Users

<u>List of adopted commitments and measures</u> ^[1]		<u>Qualitative reporting elements and service level indicators</u> ^[2]
Commitment 17	Measure 17.1: Relevant Signatories will design and implement or continue to maintain tools to improve media literacy and critical thinking, for instance by empowering users with context on the content visible on services or with guidance on how to evaluate online content.	<p>QRE 17.1.1: Relevant Signatories will outline the tools they develop or maintain that are relevant to this commitment and report on their deployment in each Member State.</p> <p>SLI 17.1.1: Relevant Signatories will report, at Member State level, on metrics pertinent to assessing the effects of the tools described in the qualitative reporting element for Measure 17.1, which will include: the total count of impressions of the tool; and information on the interactions/engagement with the tool.</p>

	<p>Measure 17.2: Relevant Signatories will develop, promote and/or support or continue to run activities to improve media literacy and critical thinking such as campaigns to raise awareness about Disinformation, as well as the TTPs that are being used by malicious actors, among the general public across the European Union, also considering the involvement of vulnerable communities.</p>	<p>QRE 17.2.1: Relevant Signatories will describe the activities they launch or support and the Member States they target and reach. Relevant signatories will further report on actions taken to promote the campaigns to their user base per Member States targeted.</p> <p>SLI 17.2.1: Relevant Signatories report on number of media literacy and awareness raising activities organised and or participated in and will share quantitative information pertinent to show the effects of the campaigns they build or support at the Member State level (for instance: list of Member States where those activities took place; reach of campaigns; engagement these activities have generated; number of interactions with online assets; number of participants).</p>
	<p>Measure 17.3: For both of the above Measures, and in order to build on the expertise of media literacy experts in the design, implementation, and impact measurement of tools, relevant Signatories will partner or consult with media literacy experts in the EU, including for instance the Commission’s Media Literacy Expert Group, ERGA’s Media Literacy Action Group, EDMO, its countryspecific branches, or relevant Member State universities or organisations that have relevant expertise.</p>	<p>QRE 17.3.1: Relevant Signatories will describe how they involved and partnered with media literacy experts for the purposes of all measures in this commitment.</p>

Reasoning for the choice of commitments and measures, as well as future plans

With the 2nd European Narrative Observatory, opsci.ai and the PROMPT consortium are making available an arsenal of disinformation dissection features to analysts, activists and journalists. These tools are consolidated with the latest AI technology and will remain available for the disinformation ecosystem.

VI. Empowering the Research Community

List of adopted commitments and measures ^[1]

Qualitative reporting elements and service level indicators ^[2]

Commitment 29:
Relevant Signatories commit to conduct research based on transparent methodology and ethical standards, as well as to share datasets, research findings and methodologies with relevant audiences

Measure 29.1: Use transparent methodologies and ethical standards to conduct research activities that track and analyse influence operations, and the spread of disinformation. They will share datasets, research findings and methodologies with members of the Task-force including EDMO, ERGA, Relevant Signatories will use transparent methodologies and ethical standards to conduct research

QRE 29.1.3: Relevant Signatories will provide detailed information on methodology development to all stakeholders informed about research results. They will also regularly inform all members of the Task-force, including ERGA, EDMO and other Signatories about research activities they conduct, and, wherever possible, the related methodologies used. They will finally share, wherever possible, such research outcomes and related methodologies with the broader public.

SLI 29.1.1: Relevant Signatories will report on the reach of stakeholders or citizens informed about the outcome of their research projects.

Reasoning for the choice of commitments and measures, as well as future plans

With the 2nd European Narrative Observatory, [opsci.ai](#) and the PROMPT consortium have made available research on disinformation narratives, coordinated inauthentic behaviour and dynamic network analysis across 3 main topics: War in Ukraine, LGBTQ+ issues and European elections. In the 3rd Narrative Observatory, [opsci.ai](#) and consortium partners will make additional research available on a wide breadth of topics.

VII. Empowering the Fact-Checking Community

List of adopted commitments and measures ^[1]

Qualitative reporting elements and service level indicators ^[2]

Commitment 31

Measure 31.4 : Relevant Signatories will explore technological solutions to facilitate the efficient use of this common repository across platforms and languages. They will discuss these solutions with the Permanent Task-force in view of identifying relevant follow up actions.

_ QRE 31.4.1: Relevant Signatories will report on the technical solutions they explore and insofar as possible and in light of discussions with the Task-force on solutions they implemented to facilitate the efficient use of a common repository across platforms.*

Reasoning for the choice of commitments and measures, as well as future plans

[Opsci.ai](#) has developed a prototype “MetaFake” feature that helps match disinformation items to existing debunks. This is to facilitate users’ access to existing fact-checking databases. This helps save fact-checkers’ time, by identifying useful debunks for their ongoing investigation; and makes fact-checkers’ work more visible in the digital space.

VIII. Transparency Centre

List of adopted commitments and measures ^[1]

Qualitative reporting elements
and service level indicators ^[2]

Commitment 34

Measure 34.3: Relevant Signatories will contribute to the Transparency Centre's information to the extent that the Code is applicable to their services.

n/a

IX. Permanent Task Force

List of adopted commitments and measures ^[1]

Qualitative reporting elements
and service level indicators ^[2]

Commitment 37

Measure 37.1: Signatories will participate in the Task-force and contribute to its work. Signatories, in particular smaller or emerging services will contribute to the work of the Task-force proportionately to their resources, size and risk profile. Smaller or emerging services can also agree to pool their resources together and represent each other in the Task-force. The Task-force will meet in plenary sessions as necessary, and at least every 6 months, and, where relevant, in subgroups dedicated to specific issues or workstreams.

n/a

Measure 37.2: Signatories agree to work on the Task Force

n/a

X. Monitoring of the Code

<u>List of adopted commitments and measures</u> ^[1]		<u>Qualitative reporting elements and service level indicators</u> ^[2]
Commitment 40	Measure 40.2. Other Signatories will report yearly on the implementation of the commitments and measures taken under the present Code, including on the relevant QREs and SLIs, at service and Member State level.	n/a
	Measure 40.3. Signatories will regularly update the Transparency Centre with relevant QREs and SLIs, at least in line with their reporting period under this Code.	n/a
	Measure 40.6. Signatories will cooperate with the European Commission, respond to its reasonable requests and provide the European Commission with reasonable information, data and further input necessary to assess the implementation of the Code, allowing for the Code's efficient and thorough monitoring, including at Member State level.	n/a
Commitment 42: Relevant Signatories commit to provide, in special situations like	n/a	n/a

<p>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</p>		
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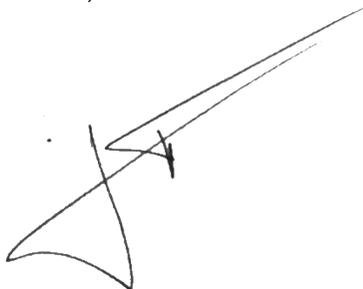
As an organisation blending academic research and practitioner experience, opsci.ai upholds a pluridisciplinary and whole-of-society approach to disinformation that increases efficiency and builds transparency. Our ambition to support the Code of Conduct on Disinformation, including through the EU-funded projects PROMPT & SPINE, is to document disinformation prevalence & emergence facilitate the exchange of information, methodologies, evidence, to characterize the prevalence, contents and methods of disinformation, to provide tools for fact-checkers, activists and decision-makers; and more broadly to operationalise a whole-of-society approach into interoperable tools and content. Where relevant and possible, opsci.ai will share the research developed in the context of the European Narrative Observatory it leads.

The commitments to which we subscribe contribute to that objective. We commit to participating in discussions with Signatories on research and monitoring of disinformation, on identifying novel disinformation risks, and engaging with Signatories to ensure enforcement, and formulate solutions.



Signature

Justin PONCET, CEO

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a series of loops and a long horizontal stroke extending to the right.

Date and place

Paris, on 18 December 2025

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

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

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