

<annual\_report\_2022>

# Colophon

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## 1. Introduction

2022 - with the COVID-19 pandemic almost at an end, it promised to be a bright year: the face masks could be taken off, society reopened. And then, at the end of February, everything was suddenly turned upside down. Russia's invasion of Ukraine made it painfully clear that independent, reliable information and a well-functioning democracy are inextricably linked; that it is vital that journalists and civil society organizations can do their work in safety; and that it is necessary that we all continue to work on this continuously. In short: the geopolitical developments in Europe in 2022 made us realize all the more that there is work to be done if we want to keep our society open and democratic and the information ecosystem that is needed for this strong and free.

For Limelight Foundation, there was also an important milestone in 2022: We welcomed a second funder on board. Thanks to generous funding from the Hartwig Foundation, our budget has grown considerably – from €3 million to €4.5 million. We are extremely grateful and

delighted that we were able to contribute to the work of no less than 18 organizations. All of which are committed to one of the building blocks that are crucial for a solid information ecosystem: independent investigative journalism, digital security, or democratic rights in a digital context.

You can read more about all this in our annual report, in which we provide an overview of all the donations we made in 2022. We also zoom in on some of the parties we supported that symbolize the anchor points in our strategy:

- Gerard Ryle, director of the International Consortium of Investigative Journalists, explains how more than 280 journalists from more than 100 countries extract stories from large amounts of leaked data;
- Follow the Money talks about Bureau Brussel,
  the new editorial team that together with
  other journalistic organizations in Europe
   closely monitors and critically examines
  the decision-making in Brussels;
- Dessi Lange-Damianova and Hisham Almiraat of Bellingcat discuss the need for information

- security and the challenges that the organization has to face in this area;
- Civil society organizations European Digital Rights (EDRi) and Bits of Freedom tell us what has been achieved this year in the creation of the Digital Services Act and Digital Markets Act, two important pieces of legislation that should curb the power of big tech companies.

Furthermore, we also highlight the 'emergency grants' that we granted to Free Press Unlimited and Reporters without Borders. The purpose of these donations was to keep the work of those journalists who had fled Ukraine, and the coverage of the situation in the country, going. Because although we as Limelight Foundation focus on the long term and prefer multi-annual support, the past 12 months also showed us how important it is to act quickly if a situation requires it.

In 2023, we will continue on this path. We are focusing resources on strengthening independent and in-depth journalism, we are helping

journalistic and civil society organizations to tighten their digital security, and we are supporting parties that are committed to protecting fundamental democratic rights in the digital age. Always with Europe as our geographical focus. And that is something that is much needed, because with fewer funders focusing on the free flow of information on European territory and with press freedom under pressure here, we see it as our duty to continue to support journalistic and civil society organizations in Europe. Focusing on the long term, but with an eye for current developments and in close cooperation with the organizations we support. 2023: bring it on!

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# 2. Limelight Foundation: Why, what, how



# Why

Citizens need independent information to make informed decisions.

Unfortunately, the production and distribution of reliable quality information is fundamentally challenged on multiple fronts. Press freedom is in decline, public trust in media is under pressure, journalism's business model is broken, and digitization can clash with core democratic values.

Limelight Foundation aims to counter these trends. We support a strong and free information ecosystem to make independent information available and accessible to all.



# What

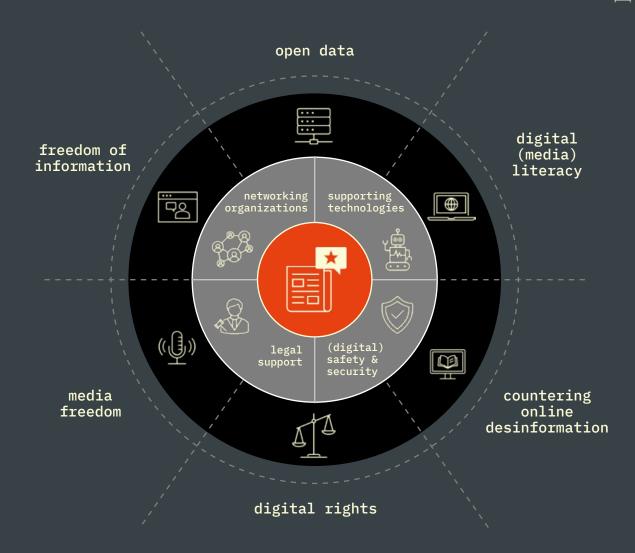
Limelight Foundation supports journalism and civil society organizations committed to a strong and free information ecosystem.





# The figure on the right shows the three areas that Limelight Foundation invests in:

- the production of independent quality information;
- 2. the infrastructure for journalists
   to do their work;
- 3. the necessary preconditions in the enabling environment for quality information to flourish.

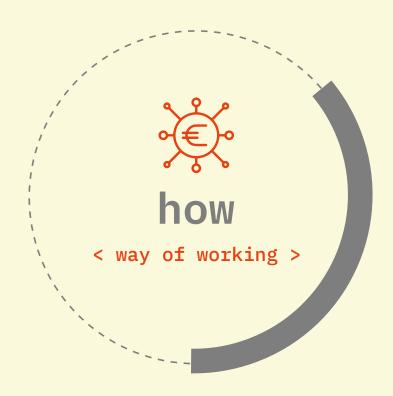


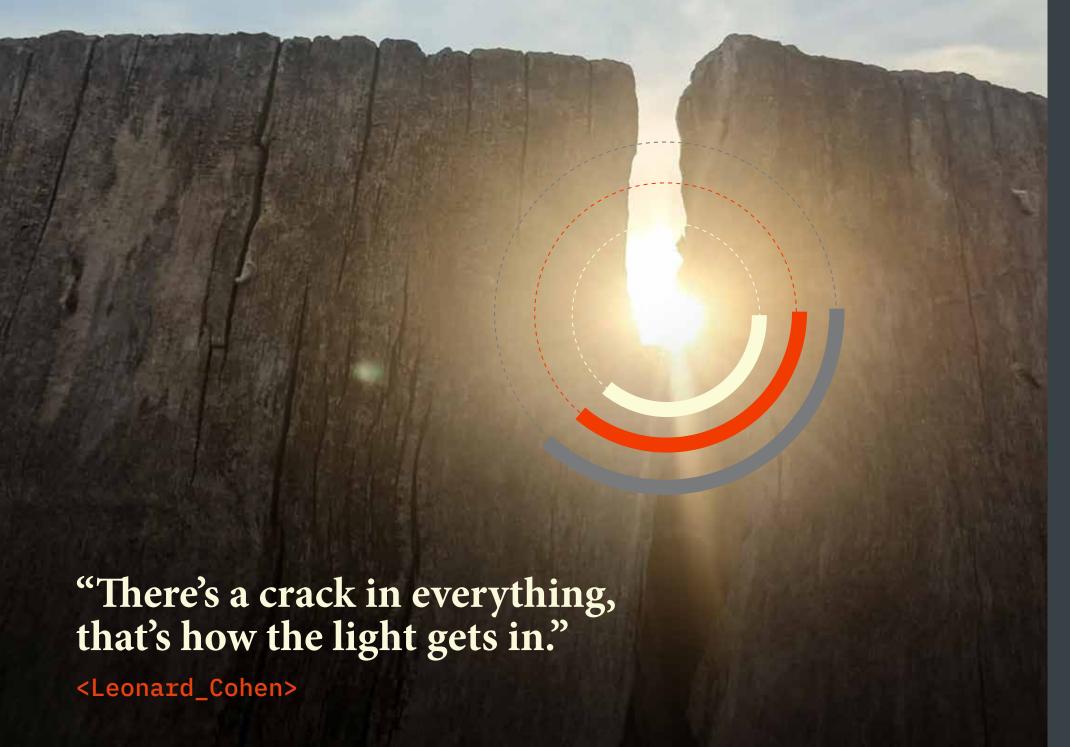
# How

- Limelight Foundation is active in the Netherlands and Europe.
- In 2022, we had a budget of € 4,5 mio.
- We support organizations that are independent of vested (political, commercial, private) interests.
- We provide donations and non-monetary assistance.
- We work together with other foundations when joining forces can result in more impact.

#### **Funding**

Limelight Foundation receives its funding from John Caspers and the Hartwig Foundation.





# 3. Who we support

<0verview of donations in 2022>

In 2022, we gave grants to 18 organizations. These donations are presented, in alphabetical order, in this chapter.



#### Access Now

Media organizations, journalists and civil society groups are increasingly confronted with digital threats and attacks, a challenge that Limelight Foundation is trying to prevent. Fortunately, there is the Access Now Digital Security Helpline, which offers free emergency technical support, 24/7. In addition to advice and assistance against attacks, the Helpline's IT security experts also provide support once the damage has been done, in order to limit the consequences as much as possible. Access Now wants its Helpline to provide the best service possible by expanding the team and training the team members. By helping them to do this, we promote the digital security and protection of media organizations, journalists and civil society groups.





# Arena for Journalism in Europe

Arena for Journalism in Europe stimulates crossborder investigative journalism in Europe. In order to collaborate safely on overarching themes such as housing, the environment and algorithms, the teams of investigative journalists need an online working setting. With Limelight Foundation's donation, Arena's IT experts can build and maintain a privacy-friendly Nextcloud work environment. The support for Arena for Journalism in Europe was expanded in December 2022 and this network will now receive core support from Limelight Foundation. This includes, among other things, support for the annual Dataharvest conference for 500+ European investigative journalists.



#### Bellingcat

Well-known for its open source investigations, the journalists and volunteers behind Bellingcat have uncovered many key stories over the past seven years. Ranging from the downing of the MH17, revelations around the poisoning of Skripal and Navalny, and investigations of weapon systems used in the Syrian civil war. This year, we gave Bellingcat a grant for updating the website to better collect and authenticate digital evidence. In this way, the material can later be used as evidence in court or for other accountability outcomes.

For more information on the work of Bellingcat, see the article on page 26.



# ICIJ ensures that every media organization fishes its own scoops out of the data mountain

The digital age presents unprecedented opportunities for journalism, such as the ability to sift through giant data sets in search of stories. The International Consortium of Investigative Journalists (ICIJ) single-handedly devised a way to generate quality journalism from leaked data sets – a mission that Limelight Foundation supports wholeheartedly. That is why we are contributing to ICIJ's new base in the EU.

With the Panama Papers, Pandora Papers and Offshore Leaks, among others, ICIJ now has an impressive track record. As a result of the ICIJ's reports on the world's rich and powerful finding their way to tax havens, whether legal or not, four government leaders were forced to resign, and worldwide legislation was amended. Not bad for a non-profit organization that only has 38 employees and is always in need of money. By expanding into the European Union, ICIJ's Irish director Gerard Ryle hopes to tap into more resources. Funding sources, such as government grants, but also journalistic sources, for new, relevant stories that the world should hear.

# How does Limelight Foundation's donation help you fulfill your mission?

'The donation has enabled us to hire a Chief

Operating Officer (COO), who will figure out what we need to get us to Europe. She considers all the things I don't really want to deal with. When you receive a donation, you want to spend every dollar on journalism. But, ultimately, that's a mistake, because there is still so much work that you then have to undertake yourself. You forget that not only do you need a great journalistic story, but you also need to tell the world. We are particularly bad at telling ICIJ's story.'

#### Creating front-page news together

And ICIJ's story is worth telling. Originally, the consortium was a network organization of journalists, part of the Center for Public Integrity in Washington D.C. When Ryle became director 11 years ago, he changed ICIJ's model. He started working with media organizations from all over the

world. In exchange for their resources, they were given access to the data leaked to ICIJ. Often these were huge data sets, such as the Pandora Papers, which contained millions of documents.

Ideally, three media organizations per country participate per project: a newspaper, a TV channel and a radio station. All participating reporters come together in an online newsroom, where they can communicate safely. The data sets are shared on another platform. What the journalists discover in the data, they share in the newsroom.

#### What are the rules?

'If you come across something important, for example the name of your prime minister, you immediately report it and contextualize it. Often this kind of thing leads to other journalists also looking for their prime minister or president. This is how you find patterns. These ultimately lead to the story we publish. The other rule is that everyone publishes at the same time; we know from the start what date we are working towards.'

#### What is the advantage of this model?

'It offers a solution to a problem that is often faced in nonprofit journalism: that it is scarcely read. I no longer have to worry about attention being paid to our stories, because the moment media partners put their resources, time and people into



it, I know for sure it will end up on the front page.'

The disadvantage of this approach is that it places ICIJ in a vulnerable position. In the early days, Ryle had to work hard to get major titles such as The Washington Post to want to work with him. But that has changed. 'There is a real respect for ICIJ now. Being an exclusive ICIJ collaboration partner in your country is something to brag about. It would be nice if our media partners could send their readers to us as potential donors in return. That's the model I want to aim for. If you have to beg all the time just to scrape together some money, you don't have time to grow. My first challenge was to professionalize us; now I want to institutionalize us.'

#### Expanding to all continents

Now that ICIJ is doing well, Ryle wants to expand. The ideal scenario would be for ICIJ to have offices on all continents, except for Antarctica. But the first step is opening an office in the EU in the first half of 2023.

## Why in Europe and not, for example, in Asia or Africa?

'Because our media partners in Europe are strong. As we become more professional, we are relying more and more heavily on the larger media partners. Take the Uber files as an example. In that project, The Guardian took on the creation of graphics, plus several other services, which trickled down to our smaller partners. By working with major European partners, we are supporting our media partners in Africa and Asia and elsewhere.'

'The moment media partners put their resources, time and people into a story, I know for sure it will end up on the front page.'

# Why is a physical office even necessary? Don't you work online?

'Indeed, we developed the Pandora Papers almost entirely online, because of COVID-19. But before the pandemic, we always met physically with everyone at the same time, to determine the potential storylines in two days. Online, it's much harder to organize a safe conversation with 125 reporters.

Another, more practical, reason is that you need a physical address in Europe to receive grants from the European Union. What's more, we hope that our presence in Europe will serve as a source for new

projects. Having a senior deputy managing editor in Europe gives us more time to consult with reporters and media partners about potential new story ideas.'

#### Will it also be easier to leak?

'I think so. As it happens, I'm sending someone from Washington to Europe tomorrow to follow up on a lead. It would be much easier if one of us were in Berlin or The Hague. At the moment, I have very few people in the organization that I can send on such a task.'

#### Soros in the Panama Papers

## Why are you considering Berlin or The Hague as your location?

'Both cities make it very easy for international organizations to operate from there. They help you with all the practical things that you don't want to worry about. And we want to be centrally located in Europe, close to Brussels. At the same time, we're not quite there yet. We need legal advice, because we have to make it clear that we will continue to publish from the United States. If you factcheck the story and if you make sure that you're not showing malice towards the person you're writing about, it is very difficult to sue in the United States. We must not find ourselves in the position where, with the move to the EU, we are suddenly being taken to court from all sides.'

# What if the name of one of your donors pops up in a data set? What do you do then?

'Publish. I'd hate to, but I'd do it. It has happened to us in the past. I once got a breathless question from Fox News: "We've found out that George Soros appears in the Panama Papers. What's your reaction to that?" So I asked where they had found that out. The answer was: on The Offshore Leaks website. I said, "Well, that's our website."

## .coda stay on the story

#### Coda Story

In the daily cacophony of current events, it is sometimes difficult to keep track of the big underlying stories. Coda Story's mission is to 'stay on the story'. In order to continually inform the world about overarching themes, from authoritarian tech to the war on science, the team experiments with narrative forms, such as documentaries, podcasts, long reads and animations. Over the next few years, Coda Story wants to grow, generate more of their own revenue and reach a larger and more diverse audience. For example, they plan to appoint a video editor and to record more narrative podcasts. Limelight Foundation's support will help Coda Story generate more impact with innovative quality journalism.

# deBALIE

#### De Balie: Live Journalism

How do you ensure that journalism on major themes attracts a wide audience? By involving the people concerned. Every six months, the research editors of De Balie debate center delve into a new Amsterdamrelated topic, such as juvenile delinquency or equal opportunities. The people concerned participate in the research, which results in a theater performance. Can they come up with a solution on the spot? Limelight Foundation wants quality journalism to reach as many people as possible. That is why we are supporting Live Journalism, which has the potential to increase confidence in journalism among those groups who don't pay attention to the evening news. With the help of our donation, Live Journalism will be extended to other Dutch municipalities.







# Dutch Institute for Vulnerability Disclosure

The Dutch Institute for Vulnerability Disclosure (DIVD) calls itself 'the Red Cross of the internet': neutral, unsolicited and unpaid employees come to the rescue and help organizations with online vulnerabilities. In this manner, they try to make the entire internet safer — an important task that fits well with the importance that Limelight Foundation attaches to digital security. With our contribution, DIVD can develop in the coming years from a young volunteer organization to a professionally led one.



#### European Digital Rights

European Digital Rights (EDRi) lobbies on behalf of 47+ European organizations for better legislation in the field of human rights and democratic freedoms in the digital world. And they do so with success: EDRi has been involved in the creation of the Digital Services Act (DSA), Digital Markets Act (DMA) and the AI Act in Europe. For the coming years, EDRi has several legal proposals planned for which a wide audience must be mobilized. This requires the expansion of the team. And as EDRi is committed to a strong and free information ecosystem, Limelight Foundation is happy to contribute to this.

For more information on the work of EDRi, see the article on page 20.





# Bureau Brussel reveals what is happening behind closed doors in the EU

European citizens know very little about how major decisions are made in the European Union. This gives lobbyists free rein and offers politicians the opportunity to blame 'Brussels' for all kinds of headwinds. Until recently, there were barely any investigative journalists active in Brussels. That is why Limelight Foundation is supporting the expansion of Bureau Brussel, an initiative of Follow the Money to structurally monitor decision-making in the EU.

In Holland House in Brussels, a narrow building not far from the European Parliament, orange flags hang above the bar. The space lends itself perfectly for the communal watching of the Dutch national championship matches, or for singing along with Hazes. But for two days in November 2022, it was almost exclusively dedicated to the EU Recovery Plan. About 20 journalists gathered there to talk about targets and milestones, beneficiaries and final recipients. The journalists present were Dutch, Finnish, Polish, French, Hungarian, Slovak, German, Spanish, Italian, Belgian, Czech, Romanian and Irish, and are part of the group behind the #RecoveryFiles. Together they are researching where the COVID-19 Recovery Plan will end up, the more than 700 billion euros that the European Commission is providing for the Member States' sustainable, social, and digital goals. The Recovery Files is an initiative of Bureau Brussel, the European branch of Follow the

Money (FTM), a Dutch collective for investigative journalists.

'The EU Recovery Plan is intended to help Europe out of the economic problems caused by the pandemic, but that is not effective if, for example, the money disappears to American companies,' says Peter Teffer, investigative journalist at FTM and project leader of the Recovery Files. 'Since Silicon Valley dominates the digital market, that's a real risk. It's matters like these that we are looking into.'

#### No public register

Finding something like that out isn't as simple as it sounds. When the EU Recovery Plan was set up, the Member States stipulated that data on the recipients of the money should only be available to the European Commission, the European Court of Auditors and the

European Anti-Fraud Office, OLAF. Therefore, there is no publicly accessible register. The information available varies considerably from one Member State to another.

In order to claim money from the Recovery Plan, each EU country has had to submit a plan with detailed targets and milestones. At the meeting, a Finnish journalist conjured up an extensive table, which he had requested from the Finnish Treasury. The table shows which organizations fall under each Finnish milestone and target. At the time of the gathering, the journalist still needed to find out which owners are behind the company names, but apart from that, he was ready to release analyses on the data.

'Finland is a huge exception,' said FTM editor-in-chief Arne van der Wal, not long after the meeting. 'It's very rare that countries release specific company names. The EU Recovery Plan is the largest support fund ever, and its financing is still unclear. It is therefore relevant for European citizens to know how all that money will be distributed, also because it will potentially lead to unfair competition. The Finnish table shows, for example, that a Finnish knife and scissor company is receiving 2.8 million euros from the pot. Why doesn't a Belgian knife and scissor company get that money?'

#### The European Cause in practice

It may have been relatively easy for the Finnish journalist, but that certainly wasn't the case for Hungarian journalist Gabriella Horn as the Hungarian government doesn't even want to make their submitted



plans public. 'As a journalist, you don't get any response from the government, so I have to rely on leaks and tips,' says Gabriella, who is grateful to be part of this group. 'Nobody in Hungary knows much about the EU Recovery Plan. I probably wouldn't have dared to dive into it on my own. Bureau Brussel is the driving force behind the entire project. They are the organizers. This allows me to concentrate on my journalistic work.'

Bureau Brussel themselves say that they do the heavy lifting. 'We have a small team in Brussels, good data journalists in the Netherlands and a technical infrastructure where we make the data accessible to other journalists,' says Arne. 'This way they can create their own stories, which often fuel new research.'

With Hungary being the only country that has not received approval for its plans from the European Commission for a long time, interest in the Recovery Plan has grown considerably. And Gabriella is benefiting from her lead. 'I was already so deep into the matter that I could interpret every piece of news from Brussels. As a result, I was the first to cover this subject for the

first to cover this subject for the Hungarian media.'

And via Bureau Brussel, Gabriella gets perspectives from different countries. 'It opens your eyes when you read what, for example, the Italians have done. I will continue

to follow their stories. And where I used to sometimes have trouble with articles for which I needed local information, I now know from whom I can request it. In this sense, the project helps the European cause. I think that's pretty magic.'

#### Expansion and professionalization

Ultimately, this is all thanks to Lise Witteman. The former parliamentary journalist made the switch to Brussels as a freelancer in 2018 and discovered to her surprise that there were hardly any investigative journalists working there. At the same time, she noticed that the Dutch House of Representatives was not properly informed about the agenda of Rutte's cabinets in Brussels. She wrote a book about what she found there and went to FTM with the proposal to set up an EU desk, modelled on Lighthouse Reports (which also

receives core support from the Limelight Foundation).

'Lighthouse Reports initiates investigations, for
example, into the arms trade in the Balkans, and looks
for journalists with a certain expertise,' says Lise.

'Those journalists publish pieces about the research in
the media for which they work. That works well, because
you're not competitive. FTM is not competing for the
same readership as Le Monde.'

'We expose the fact
that your own national
minister has played a
dubious role.'

At FTM, they were immediately enthusiastic
about the idea. Although Bureau Brussel
was supposed to start small, they quickly
noticed that the EU is a real goldmine for
investigative journalists. The collaboration
network expanded rapidly and Lise had her
hands full managing all partners.

Limelight Foundation's support, therefore, comes at just the right time. 'Thanks to the Limelight Foundation, we can expand and further professionalize Bureau Brussel,' says Arne. With the help of the donation, Bureau Brussel has now been expanded with two journalists and a research assistant. Investment has also been made in the data infrastructure.

For data journalist Ada Homolová of FTM, European datasets are like a candy jar. For Bureau Brussel, she investigated, among other things, how European agricultural subsidies are distributed and who the largest recipients are. 'It was a dataset of almost a million transactions,' she says. 'The Dutch government must make this data public every year. The fact that things are different with the Recovery Files makes this project considerably more complicated.'

#### Interaction and cross-pollination

The Recovery Files have been in the works for over a year now. And Bureau Brussel sees that the physical meetings do wonders for the collaboration. 'We communicate via a Slack channel and virtual meetings, but only at a time like the one when everyone gathered at House Holland in November do you get interaction and cross-pollination,' says Peter. 'The willingness to go that extra mile for the other journalists is also increasing. You know what you're doing it for.'

During the first meeting, in November 2021, the journalists compared the Member States' plans. For example, they discovered that the automotive industry is a major recipient of the Recovery Plan fund in several countries, despite the green principles. Large consultancy firms also gain a lot of money from the Recovery Plan, according to the research.

When enough information from all countries has been collected, Peter or Lise writes a piece which all the international journalists use as a base for their own story. Not everyone contributes equally to every story, but that is part of the working method. The most important thing is that the story is spread as much as possible.

#### A better name for Brussels

Because there are major titles participating in the project, such as Le Monde and Die Welt, the spreading of the stories works well. The interest of many parliamentarians has also been aroused. However, bringing stories about the EU to the general public

remains a challenge. 'People are quick to think that they don't actually need to read about it to know that everything is in jeopardy there,' Lise says. 'While there are also things that are going very well.'

But surely a project like the Recovery Files will mainly contribute to the idea that everything is going wrong in Brussels? 'I don't believe that as a journalist it's your job to do the PR for the European Commission,' Lise says. 'But by describing how it works there, we probably give Brussels a better name in practice. Often the European Commission's proposals are pretty good and so are the adjustments of the European Parliament. It is the Member States that are obstructing agreements. Because there is no transparency whatsoever about the European Council, where the Member States meet, the general public does not see this negative influence. We expose the fact that your own national minister has played a dubious role.'

#### Top 100 recipients

Postscript: A few weeks after the Bureau Brussel meeting, the rules for the EU Recovery Plan were renegotiated. The Member States agreed to the European Parliament's demand to at least publish the names of the Top 100 recipients who received the most money from the Recovery Plan fund in their countries.

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#### BUREAU BRUSSEL

# Follow the Money: Bureau Brussel

When in doubt, 'follow the money'. This quote from the 1976 docudrama All the President's Men is put into practice daily by the journalistic research collective of the same name. Originally working within the Netherlands, Follow the Money now also focuses on policymakers in the EU, who make major decisions without many investigative journalists closely following them. Because Limelight Foundation also believes that the role of the EU is often underexposed, we are supporting the creation and strengthening of Follow the Money's Brussels team. Bureau Brussel will initiate and coordinate Europe-wide, data-driven research projects.

Read more about Bureau Brussel on page 20.



# Free Press Unlimited: Media Lifeline Ukraine

From the onset of Russia's invasion of Ukraine,
Free Press Unlimited has been busy bringing
journalists to safety with its Media Lifeline
Ukraine. Refugee journalists are taken care of in
Media Outlet Support Hubs in Poland, where they
receive temporary housing, equipment and support,
among other things. Limelight Foundation supports
the hubs so that these journalists can, regardless
of the difficult circumstances, continue to provide
independent information to the public in their
home countries.

For more information on the work of Free Press Unlimited in Ukraine, see page 38.





# International Consortium of Investigative Journalists

The Panama Papers, Paradise Papers, Pandora Papers and Uber Files: these names are greatly recognized. Far more so than that of the International Consortium of Investigative Journalists (ICIJ), the American research journalism organization that has already revealed so many financial and economic secrets. With its own editorial staff of 38 FTEs, a worldwide network of 280 renowned investigative journalists and 100 media partners, ICIJ is a highly experienced and successful organization that needs to scale up. With its donation to help ICIJ establish an EU base, Limelight Foundation is enabling the brave data journalists to make the organization more sustainable and increase the impact of their work.

Read more about ICIJ in the article on page 14.



#### International Press Institute

Journalists around the world are hindered, injured and sometimes even murdered in their work. The war in Ukraine alone cost the lives of at least 12 journalists in 2022. The mission of the International Press Institute (IPI) is to defend media freedom and the free flow of news wherever in the world they are threatened. And where necessary, IPI provides emergency assistance. With the help of Limelight Foundation's donation to IPI, journalists from The Kyiv Independent were provided with safety equipment, such as helmets, vests and pressure bandages, so that they could carry on with their work protected under very difficult conditions.





# In-house digital safety officer keeps Bellingcat's many enemies at bay

Numerous journalistic and civil society organizations face powerful adversaries who are not afraid to attack them digitally or physically. Challenges in the field of information security follow each other in rapid succession, but many organizations do not have the knowledge or resources to address them effectively. A problem that research collective Bellingcat also faced. Until Limelight Foundation provided it with the funds to hire an in-house digital safety officer.

Since its launch in 2014, Bellingcat has gathered an impressive amount of information on wrongdoing. From the true circumstances of the MH17 disaster to the names of the Russian military engineers involved in the missile strikes on Ukraine: with the help of open-source intelligence (OSINT), the researchers are able to gather facts time and time again. Not only does this earn them a great deal of praise, but they also gain dangerous enemies. Bellingcat's Executive Director Christo Grozev says he is high on Vladimir Putin's hit list. Other government leaders are also not always that happy with the online researchers' investigative work. As a result, the researchers are very aware of their digital and physical security from the get-go. For a long time, Bellingcat relied on that individual sense of

responsibility, but as the organization has grown, it has become necessary to enshrine safety at an organizational level.

'We have been aware of the problem for a long time, but when you are busy transitioning from a group of volunteers into a structured organization, everything has priority,' says Dessi Lange-Damianova, Chief Operating Officer (COO) at Bellingcat. 'We are really glad, therefore, that Limelight Foundation insisted we should hire an in-house digital safety officer and provided the necessary resources to make that happen.'

#### Technological safety and human behavior

Dessi soon discovered that she was not only looking

for someone with expertise in the field of technological safety, but also with knowledge of human behavior. She found these in Hisham, who has been working at Bellingcat since March 2022. His approach there is focused, on the one hand, on implementing security policy and, on the other hand, on making sure underlying technology isn't interfering too much with the staff's daily job.

'People should be able to do their work without worrying too much about safety, because it's always present in the background.' That includes things such as a standard VPN that anyone can use, password management, and remote monitoring. When it comes to the field of behavior, Hisham organizes webinars, talks, exercises and tests, with the ultimate goal of making cybersecurity second nature. 'For a digital safety officer, it's great to work at an organization where people are, by definition, already cautious with a view to the mission. For example, I never have to spend more than a minute convincing Bellingcat employees why they should be using two-factor authentication. They already know why.'

#### Danger from within

During a recent retreat, Bellingcat employees were asked, among other things, to come up with creative ways in which digital threats could present themselves. What, then, are the organization's crown jewels that must be protected at all costs? 'We came





'We came to the conclusion that our reputation is our most precious asset.' to the conclusion that our reputation is our most precious asset,' says Hisham. 'Our credibility makes people trust us, read our articles and share our conclusions. So we have to make sure that our reputation is protected as much as possible.'

That realization led to the worrying conclusion that Bellingcat is vulnerable. The organization can still invest so much in advanced technologies, such as encryption, but in the end, it only takes one person in the organization who does something wrong, whether consciously or not, to tarnish its reputation.

'That was a real eye-opener. For me too,' says Hisham. 'We are dealing with very advanced, highly motivated and well-funded opponents. Adversaries go to great lengths to stop us from telling our stories. If I were in their shoes, I would attack our credibility so that people wouldn't trust us anymore.'

#### Security agent as workshop participant

The risk that the danger comes from within is not purely theoretical. In the past five years, Bellingcat has had to deal with two situations in which there were significant deviations from the safety protocols. In one case, it was confirmed that a workshop participant was in fact a security agent from a rogue state. In the other instance, it seems

highly likely that an intruder had gained access to the organization for various reasons. 'People go to great lengths to get into Bellingcat, whether it's to steal information or just to be able to say they work for the organization,' Dessi says. 'It's a painful experience, but we try to be open about our mistakes and learn from them.'

#### Better screening of applicants

That is why a major program will be implemented to screen applicants and check the current workforce. Not out of distrust, but because everyone will be able to sleep better once the program has been completed. We trust our employees, and we want to make sure that we are not vulnerable to the risk of infiltration, especially by a state actor, says Hisham. Our recent experience made us aware that an infiltration is a plausible risk. Our staff agrees. We are trying to figure out the best way to mitigate the risk of an insider threat in full respect of our ethos as an organization that values openness and collaboration, and without encroaching on our people's privacy and rights.

'Adversaries go to great lengths to stop us from telling our stories.'

#### Other security risks

The danger of intruders discrediting the organization is not the only security risk. For example, Bellingcat is, by nature, a very mobile organization: if necessary, it is possible for employees to work wherever it suits them, including in bars and hotels. Which is great, but not that convenient when it comes to digital security. They have now got to the point where every laptop or phone that employees receive is equipped with security measures. And then there are also the old-fashioned safety measures that need to be taken, such as equipping their new building with sturdy locks.

The kind of very sophisticated cyberattacks that you read about in the news are fortunately less common at the Bellingcat headquarters. 'We don't see that many sophisticated cyberattacks,' says Hisham. 'Most adversaries prefer to use phishing emails and scams. Our adversaries check social media and then try to create a credible scenario, for example that Dessi asks me to log in somewhere as a matter of urgency. I think we are hard to catch out in that respect. I would be really surprised if they succeeded. But we stay vigilant.'



#### Investico

How could a Multidisciplinary Intervention Team against subversive crime have cost almost 160 million euros without catching a single crook? Why did former European Commissioner Neelie Kroes fall over herself to help Uber? Investico is an independent non-profit journalism platform that likes to get to the bottom of things. How are decisions made? Who benefits? The donation from Limelight Foundation will enable Investico to expand its editorial staff in the coming years. Thus, we are investing in in-depth quality journalism.



#### journalismfund.eu

With its donation to the non-profit organization journalismfund.eu, Limelight Foundation is helping promote cross-border investigative journalism in Europe and contributing to numerous smaller investigative journalism projects by cross-border teams across the continent. A total of 100 projects will receive a working grant in 2022 and 2023.





#### Media Defence

Legal aid may not be the first thing you think of when it comes to protecting a strong and free information ecosystem. Nevertheless, it is an important component. Where would quality journalism be without the help of lawyers who check items and who can provide support if the media is sued anyway? The British non-profit organization Media Defence provides legal support to journalists, citizen journalists and independent media. Their cases are increasingly about 'protection in the digital sphere', for example with hacking, online harassment or the blocking of websites. Limelight Foundation gave a donation specifically aimed at Media Defence's work in Europe, where they are increasingly active due to the decline in press freedom. The donation enables direct legal support and strategic litigation.



# Organized Crime and Corruption Reporting Project

Goodbye Marlboro Man, hello Silver Elephant. Accounting for nearly half of global cigarette production, the China National Tobacco Corporation uses the same strategies to get the world addicted as 'Big Tobacco' did in the past. Few knew about this until Organized Crime and Corruption Reporting Project (OCCRP) delved into China Tobacco. Digging into complex networks is typical of OCCRP. Now that the environment for press freedom in Bosnia-Herzegovina is deteriorating, OCCRP is moving its headquarters from Sarajevo to Amsterdam. Limelight Foundation is supporting this relocation financially and is also contributing to the strengthening of the tech department, as the need for digital security and digital tools from the 52 member centers increases.



# EDRi wants to rein in the power Big Tech companies currently hold

Legislation concerning the online world has long lagged behind reality, resulting in large American and Chinese tech companies calling the shots. They determine which content is curated, amplified and how people can communicate about it with each other, issues that have a major impact on journalism and the functioning of democracy worldwide. Which is why we are supporting European Digital Rights (EDRi), a collective of 47+ NGOs as well as experts, advocates and academics working to defend and advance digital rights.

According to the President of the European Commission, Ursula von der Leyen, 'Digital is the make-or-break issue': it concerns all sectors, it is geopolitical, and it is a determining factor for the future that Europe wants to build. The European Union is increasingly presenting itself as the guardian of 'European public values', such as equality, inclusiveness and transparency. In 2024, two major European laws will come into force that are intended to limit the power of the Big Tech companies: The Digital Services Act (DSA) imposes rules on online platforms, for example in the field of illegal content; the Digital Markets Act (DMA) ensures that the tech companies cannot abuse their market power. What is laid down in the DSA and DMA is the result of a long and unequal battle.

#### Fake lobby organizations

One of the players in that battle is EDRi, which advocates in Brussels on behalf of 47+ European NGOs for better legislation in the field of human rights and democratic freedom in the digital world. EDRi represents a mix of technologists, lawyers, activists and academics. They often find themselves working as part of civil society on the opposite side of corporate lobbyists, who not only have much more money and power, but who also do not always play by the book.

'In the run-up to the DSA adoption, some Big Tech companies were accused of deceiving European law makers by hiding behind front organizations, supposedly operating on behalf of European SMEs,' explains Claire Fernandez, EDRi's Executive

Director. 'These organizations argued that the current online advertising model is useful for promoting the services of small businesses. In reality, small businesses often feel trapped in a system in which they are forced to advertise on Facebook or Google, while the biggest advertising revenues are for the tech companies themselves.'

#### Proactively influencing the agenda

EDRi works a lot more transparently. The members try to influence the results of the European legislative process positively by tabling amendments to European legislation, writing open letters, mobilizing the public at key moments and providing advice on how the advertising technology industry works. 'We are trying to proactively influence the agenda,' says Claire. 'If we know that the European Commission will make a proposal, such as the DSA, we consult EDRi members and partners, and write position papers in which we express our vision on the subject. Around the time the proposal comes out, we usually organize consultations, write opinion pieces, and so on. We then follow the whole process of legislating and try to influence the European Parliament and the Member States. Once the law has been adopted, we try to ensure adequate and effective enforcement in the various countries.'

One of EDRi's founders is Bits of Freedom, a Dutch foundation that is committed to digital civil rights



and can use EDRi's help in this. 'The EU is incredibly big and complicated to fathom, which makes working together very important,' says Lotje Beek from Bits of Freedom. 'EDRi understands the Brussels mill and is also physically present there. This enables them to advise us on when we should intervene in the legislative process.'

#### A moving lobby train

The European Union's legislative process works as follows: the European Commission submits proposals for new laws. The European Parliament (800 parliamentarians) and the Council of Europe (27 European ministers) start working on the proposal, with plenty of lobbying from all stakeholders. In the so-called 'trilogues', the three parties then try to reach a compromise behind closed doors.

Lawyer Lotje Beek jumped on a 'moving lobby train' around the DSA and the DMA in September 2021 when she started at Bits of Freedom as a policy adviser. EDRi's position papers were ready and the writing of

no less than 3,000 amendments was in full swing. 'Every member of EDRi chose their priorities, which we usually shared with some other members,' says Lotje. 'Bits of Freedom, for example, focused on banning ad tracking. Every week we held a meeting, led by EDRi, to share updates and collaborate.'

The Presidency of the European Union rotates every six months. It was very important for France to get the DSA and the DMA through during their Presidency, says Lotje. As a result, some parts went much faster than usual. 'The trilogue, in which the three legislative authorities seek a compromise with each other, is, in particular, not at all transparent. In one very long one-day meeting, they made all kinds of decisions on things that we had been working on for a year. That was quite stressful.'

'The platforms profit from amplifying polarizing content. We managed to get that on the DSA negotiation agenda.'

#### Best possible outcome

Under the present political circumstances, the current version of the laws is the best possible outome that EDRi could achieve, Claire believes.

Although a total ban on surveillance-based advertising did not go through, it is forbidden to advertise on the basis of profiling using sensitive data. Minors may no longer see targeted online advertisements at all. Claire is happy that EDRi has managed to somehow limit the use of 'dark patterns', manipulations in the design of a website that make you unintentionally give away data. Online platforms should also become more transparent about recommender systems and offer at least one option that is not based on profiling. Within the DMA, EDRi



and their supporters managed to ensure that companies are no longer allowed to give their own products preferential treatment on their platforms. The ban on collecting data across services, for example from WhatsApp and Facebook, has also satisfied EDRi.

#### Freedom of expression remains intact

According to Claire, these achievements have been possible because EDRi shifted the narrative from content moderation to the revenue models of very large online platforms. 'When it comes to freedom of expression, an obligation for online platforms to monitor all content would be problematic. It can have a negative impact on journalists, human rights activists and marginalized groups, particularly when an authoritarian state can force the platforms to remove content. Instead, you need to look at why some content is pushed and amplified. These platforms profit from amplifying this kind of polarizing content. That's what we managed to get on the agenda in the DSA.'

For Bits of Freedom, breaking the market power of Big Tech companies is the main goal. That is why Lotje is particularly fond of the DMA. 'We are delighted that the proposal for interoperability of messaging services has been adopted,' she says. 'This means that you can receive messages from Signal via WhatsApp and vice versa. That will really make a big difference to market power.'

#### More regulation on digital matters

EDRi's work in Brussels is not yet done. Many European regulations are closely linked to the DSA, such as legislation on political advertisements, the European Media Freedom Act and the European Commission's proposal to prevent the dissemination of child sexual abuse images. The DSA alone creates at least six or seven different areas that must be monitored by the members of EDRi, Claire says. Bits of Freedom is working on a public campaign to raise awareness about the DSA. With the support of EDRi, the campaign will probably be translated and rolled out in Europe.

The biggest challenge for EDRi is not to spread itself too thin and to maintain enough impact. That is why they often work together in coalitions with other NGOs, in areas such as health, migration, climate and racial justice. The fact that Limelight Foundation is supporting EDRi in their core activities gives the organization financial stability and resilience, Claire says. 'Limelight knows how to build an ecosystem. This donation helps us to establish a strategy and support the entire organization.'



#### Reporters without Borders

Every human being has the right to free and reliable information. That is why Reporters without Borders is committed to the freedom, diversity and independence of journalism and of those who embody these ideals. In concrete terms, they did this in 2022 by setting up a press centre in Lviv, Ukraine, where journalists can go for bulletproof vests, as well as for financial and psychological help. Limelight Foundation considers it important that journalists can continue to do their work protected even in very difficult circumstances and therefore made a donation to the press center.

For more information on the work of Reporters without Borders in Ukraine, see page 38.

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## Stichting1877

#### Stichting 1877

The weekly De Groene Amsterdammer magazine was founded in 1877, a time when the pace was significantly slower than it is today. Whereas in the past it was not uncommon for a journalist to spend months getting their teeth into a story, in 2022 it has become a lot more difficult due to point-scoring and stripped-down editorial teams. That is why Stichting 1877 (the 1877 Foundation) is committed to in-depth investigative journalism, for which editors and individual journalists cannot otherwise make time. The foundation shares its focus on in-depth journalism with Limelight Foundation, which is happy to support Stichting 1877.

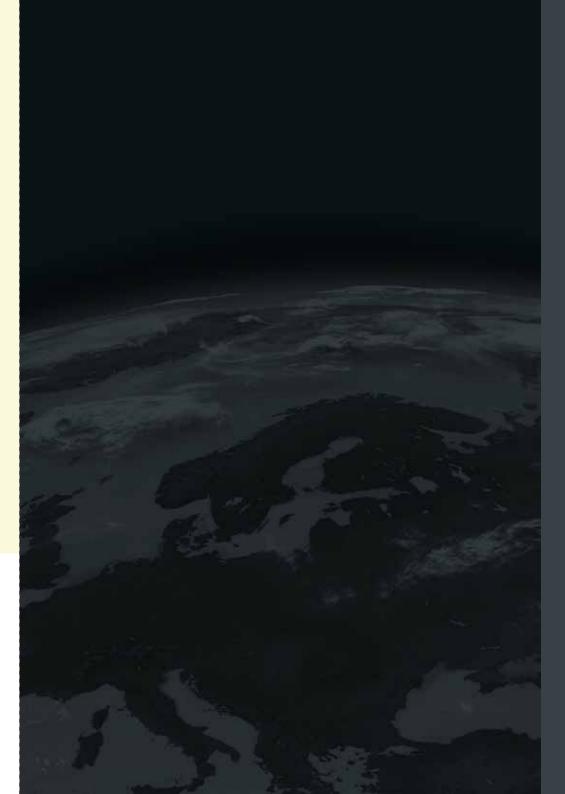


#### EUROPEAN ARTIFICIAL INTELLIGENCE FUND

### The European AI Fund

Imagine a world where 'AI serves the interests of individuals and society, and where the policies and funding that regulate AI champion equity, fairness, and diversity, as well as democracy and human rights.' Hard to imagine? That is exactly why the European AI Fund was created. This partnership of funds is working from Brussels to influence the direction in which AI is developing in Europe. Limelight Foundation provides the European AI Fund with flexible donations to enable them to exert influence on the AI Act at the right moments. The support also focuses on (journalistic) research into the impact of AI on society.





# The importance of swift-acting funds in times of need

In crisis situations, there is no time for sluggish bureaucracy. Russia's invasion of Ukraine in February 2022 called for swift action to protect its news coverage and the lives of journalists. Limelight Foundation helped organize emergency aid, and is supporting various projects that ensure that reliable information for and about Ukraine remains.

It's February 24, 2022. After weeks of increasing threat, the invasion of Ukraine still comes as a surprise that rocks the entire world. It appears that Russia has set its sights on targeting the whole of Ukraine, not just the Donbass region. Free Press Unlimited and Reporters Without Borders, two international organizations dedicated to protecting press freedom, jump right into survival mode.

'We had a kind of hotline with our Prague office, which works with our Ukrainian partners a lot,' says Ruth Kronenburg, Free Press Unlimited's Director.
'We knew we had to organize something quickly, so we freed up all the manpower to set up Media Lifeline Ukraine.'

Media Lifeline Ukraine is a coalition to protect journalists and maintain the availability of reliable information in Ukraine. The collaborating partners organized a successful fundraiser within a matter of days. The proceeds of which were used to bring Ukrainian and Russian journalists to safety, to bring bulletproof vests and helmets across the border, and to protect the digital security of journalists in the region. Getting the money together turned out to be easier than purchasing and distributing the safety equipment, because the demand for vests and helmets was high and the delivery time was long. Free Press Unlimited and Reporters Without Borders were in close consultation with the Institute for Mass Information (IMI) in Ukraine. 'At IMI, they received more requests than they could cope with, ' says Thibaut Bruttin, Assistant Director General of Reporters Without Borders. 'Moreover, they were dealing with their own personal misery, with family members who had to join the army and families who had to flee the war zones. That is why we decided to take action on the spot. It took us a week to determine the most effective way in which we could help, namely by centralizing, and then ten days to realize it.'

#### Movement underway

Together with Free Press Unlimited, Reporters Without Borders set up a press center at breakneck speed. The location: Lviv, an 80-minute drive from the Polish border. Thibaut was surprised by the generosity of the funds offered. 'Normally, applying for a grant or donation is a tough and bureaucratic process,' he explains. 'But this time, it was possible to arrange all the paperwork afterwards. If you have to buy 100,000 euros worth of safety equipment on Monday, it's nice to know that the money needed will come the next day. This is extremely important in a crisis.' Many of the organizations that wanted to contribute were alerted to Reporters Without Borders' initiative by Limelight. 'Limelight Foundation was the initiator that started a movement,' says Thibaut. In addition to Free Press Unlimited and Reporters Without Borders, Limelight Foundation is also supporting International Press Institute, which provides journalists from The Kyiv Independent with safety equipment such as helmets and pressure bandages.



#### Training and psychological support

On March 11, the first shipment of bulletproof vests arrived at the press center in Lviv. They came from the Swedish media group Bonnier. As the equipment is intended for the Scandinavian market, all the vests were snow-white, not exactly the most ideal color for a Ukrainian spring. But white or not, at least some of the approximately 1,000 foreign journalists in Ukraine and the thousands of Ukrainian journalists present were now protected. In the weeks that followed, more consignments of vests and helmets arrived, coming from the market, and then first-aid kits, power banks and other equipment too.

On May 18, the second press center opened its doors in Kyiv. A total of 93 journalists and 30 Ukrainian media organizations received financial support from Reporters Without Borders, for example to be able to use a taxi to escape an unsafe situation. Two hundred journalists received training in physical safety and first-aid skills. The centers also offer psychological support. 'During war, many journalists don a macho attitude,' says Thibaut. 'We were warned that it would be difficult to persuade them to visit a psychologist. But more than 30 psychological sessions have now been organized. The need is certainly there.' The safety handbook that is available in the press centers is also in great demand. According to Thibaut, it is partly thanks to

these precautions that 'only' eight journalists have been killed and seventeen injured in the violence of war.

#### Matching needs

Free Press Unlimited set up their own emergency aid system. They helped over 800 journalists, delivered 150 ballistic vests and helmets and relocated many journalists to safer grounds. In order to get effective structural aid under way, they had to wait for the initial dust to settle. Many Ukrainian journalists (all women, because the men are fighting at the front) settled with their children in surrounding countries. Which is why Free Press Unlimited approached Limelight Foundation and proposed the setting up of media hubs. They already have experience with two small media hubs in Poland for Belarusian journalists that had fled their country, which were set up in partnership with an NGO called Belarus in Focus.

'We help both the media that are still there and the refugees in their livelihood' 'We wanted to expand these hubs with Ukrainian journalists,' says Ruth. 'The hubs have someone who knows how Polish legislation works, how to register children at school…the kind of daily things that make you able to go back to work yourself.'

First, it had to be clear whether Ukrainian journalists intended to stay abroad for at least six months. If, around September time, it turned out that this was indeed the case, the media hubs could start up. In an open space, well-equipped workplaces were set up for Ukrainians and Belarusians. Free Press Unlimited provides mentorship, both for Ukrainian and other refugee journalists. Many of the media professionals come from TV journalism and need further training to serve the remaining media in Ukraine, mainly newspapers and online media.

'We try to match the needs of our Ukrainian media partners inside the country with the hubs abroad,' Ruth says. 'They are facing a shortage of personnel because many men are fighting at the front. We are now at the point where we have given fellowships to five female journalists in Poland and are linking them with several independent media outlets in Ukraine. An additional advantage is that the journalists in Poland can report on compatriots abroad as well as on the war. In this way, we help both the media that are still there and the refugees in their livelihood.'

#### Enormous resilience

Now that the journalists present are almost all equipped with security equipment, Reporters Without Borders' focus has shifted to investigating the murders of journalists in the war, which they are doing in collaboration with Ukrainian media. They also aim to combat the Russian propaganda machine, by exposing disinformation.

What Thibaut has learned from the experiences of the past year is that, above all, very close attention must be paid to what the beneficiaries in need require. Ruth agrees. They both praise the Ukrainians' resilience. 'It is so impressive how our Ukrainian colleagues get back to work five minutes after a bombardment,' Thibaut says. 'A great example of public resilience is that the postal system is still working. We had the bulletproof vests delivered by post.'

'The journalists are traumatized, but they're trying to make the best of it,' Ruth says. 'There is a constant shadow hanging over them, because at any moment they could get bad news about their fathers, partners and brothers in the army. It's great that they can at least continue to carry out their job and get paid for it thanks to Limelight Foundation.'



## 4. Who we are

<our people>

#### <board>



John Caspers

Internet entrepreneur
Co-founder of i.a. Adyen;
Founder of Limelight Foundation



Merel Borger - Director

Founding & former Director
of Limelight Foundation
Previous roles: Program
Manager at Adessium Foundation;
Journalist at NOS and NPO
PhD in journalism studies



Joseph Peeraer

Founder of multi-utility company Budget Current role: Founding partner of deep-tech VC Positron Ventures



Hannah de Jong

Lawyer specialized in privacy & compliance Head of Group Legal at Inter IKEA

#### <organization>



Floor Milar - Program manager

Background in law, editing & publishing. Previous roles at De Correspondent and the Dutch Association of Journalists



Willem Lenders - Program Manager

Background in cultural analysis, marketing & communication. Previous roles at Democracy & Media Foundation, DeGoedeZaak and De Balie



Andrea Simonca - Office Manager

Master of Public Administration Previous role at hardwear.io

#### <advisory\_board>

#### Algirdas Lipstas

- media development consultant

#### Maike Olii

- independent advisor & creative consultant

#### Claes de Vreese

- professor of artificial intelligence and society at University of Amsterdam

#### Wouter van der Pauw

- founder & creative at Signal.Stream

#### Mieke van Heesewijk

- deputy director at SIDN Fonds

# 5. Financial summary 2022

<Balance sheet at 31-12-2022>

ASSETS			LIABILITIES		
	(in €)			(in €)	
Current assets			Reserves		
Cash & cash		5.128.812	Other reserves	243.508	
equivalents					
			Long-term liabilities		
			Accrued liabilities	1.368.000	
					1.368.000
			Short-term liabilities		
			Accounts payable	1.304	
			Accrued liabilities	2.016.000	
			received donations for 2023	1.500.000	
					3.517.304
Total assets		5.128.812	Total liabilities		5.128.812

Limelight Foundation maintains reserves at a level necessary for the continuity of its activities.

The reserves equal three months' organizational cost at the time of approval of the annual accounts.

### <Income and Expenditure Statement for 2022>

	2022	
	(in €)	
Income		
Donations received	4.500.000	
Total income	4.500.000	
Expenses		
Donations allocated	3.948.500	
Staff costs	257.632	
Operating costs	103.842	
interest costs	14.845	
Total expenses	4.324.819	
Net result	175.181	

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# Supporting a strong and free information ecosystem in the digital age

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