

MODULUS AI, INC.

MOD 1401:2026

Modulus Verification Standard

Verification of organizational facts and of the representation of organizations by artificial intelligence systems

General principles and requirements for verification bodies

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Contents

Document control.....	2
Contents	3
Foreword	6
Introduction.....	7
1 Scope	9
2 Normative references	9
3 Terms and definitions	11
4 Principles	14
5 General requirements.....	16
5.1 Legal entity.....	16
5.2 Responsibility for verified facts, findings and records	16
5.3 Management of impartiality.....	16
5.4 Liability and financing	17
5.5 Legal review	17
6 Structural requirements.....	19
6.1 Organizational structure and top management	19
6.2 Operational control.....	19
6.3 Impartiality review.....	19
7 Resource requirements.....	20
7.1 General	20
7.2 Personnel and roles	20
7.3 Competence criteria	20
7.4 Competence management	21
7.5 Use of software and AI systems by personnel	21
7.6 Outsourcing	22
8 Program requirements.....	23
8.1 General	23
8.2 Systems in scope.....	23
8.3 Fact types in scope.....	23
8.4 Evidence requirements	23
8.5 Testing protocol	24
8.6 Finding categories	24
8.7 Record and publication	24
8.8 Periods, intervals and counts	24
8.9 Program change control	24
9 Process requirements	25
9.1 General	25
9.2 Pre-engagement	25
9.3 Engagement.....	25
9.4 Planning	26

9.5 Fact verification	26
9.6 Investigation of AI representations.....	27
9.7 Findings.....	27
9.8 Subject approval and election of disclosure	28
9.9 Independent review.....	28
9.10 Decision and issue of the verification statement and record	29
9.11 Delivery and publication	29
9.12 Corrective action and verification of effect	29
9.13 Re-verification.....	30
9.14 Facts discovered after issue	30
9.15 Notices of error.....	31
9.16 Appeals	31
9.17 Complaints.....	31
9.18 Corrections.....	31
9.19 Suspension, withdrawal and termination.....	32
9.20 Records and evidence preservation.....	32
10 Information requirements	33
10.1 Publicly available information.....	33
10.2 Machine-readable publication.....	33
10.3 Reference to verification and use of the mark	33
10.4 Confidentiality.....	34
10.5 Information to the subject.....	34
10.6 Document control of this standard.....	34
11 Management system requirements	35
11.1 General	35
11.2 Documentation	35
11.3 Control of documents and records	35
11.4 Management review.....	35
11.5 Internal audit	35
11.6 Nonconformities and corrective actions.....	35
11.7 Risks and opportunities	36
Annex A (normative): Evidence tiers and acceptance criteria by fact type	37
A.1 Evidence tiers	37
A.2 Acceptance criteria.....	37
A.3 Documented search.....	38
A.4 Evidence disclosure levels	38
A.5 Jurisdictional alternatives.....	39
A.6 Fact types and required evidence.....	39
Annex B (normative): Testing protocol for AI representations	41
B.1 General	41
B.2 Question families	41
B.3 Condition sets.....	41
B.4 Environment and account hygiene	42
B.5 Capture requirements	42
B.6 Detection of major releases.....	43
B.7 Reproducibility package.....	43

B.8 Validation of collection software.....	43
B.9 Minimum observations.....	43
B.10 Controls	43
Annex C (normative): Finding categories and decision rules	44
C.1 Categories	44
C.2 Misattribution analysis	45
C.3 Decision rules.....	45
C.4 Precedence	45
C.5 Form of a finding.....	45
C.6 Interpretation of findings	46
Annex D (normative): Record content and structured data	47
D.1 Structure of a record	47
D.2 Record page content	47
D.3 Entry metadata.....	47
D.4 Structured data	47
D.5 Extension vocabulary.....	48
D.6 Rating mapping.....	48
D.7 Well-known index.....	49
D.8 Example	49
Annex E (normative): Periods, intervals and retention	50
Annex F (normative): Verification statement.....	52
Annex G (normative): Use of the Modulus Verified mark	54
Annex H (informative): Correspondence with ISO/IEC 17029:2019	55
Bibliography	57

If page numbers are not shown, right-click the table of contents and choose Update Field.

Foreword

MOD 1401:2026 is published by Modulus AI, Inc., Scottsdale, Arizona, United States. This is edition 2026, version 1.0, the first publication of the standard, published on 2026-10-26 and effective from that date. The document of record is the version carrying DOI 10.5281/zenodo.23654808. The text at modulus.ai/standard reproduces it; where they differ, the document of record governs.

Basis. The structure and principles of this standard follow ISO/IEC 17029:2019, Conformity assessment, General principles and requirements for validation and verification bodies, adapted to the verification of organizational facts and of the representation of organizations by artificial intelligence systems. Annex H states the correspondence clause by clause. MOD 1401 is an independent standard; it is not a claim of conformity with ISO/IEC 17029, and no accreditation is held or claimed under that or any other standard.

The verification body. Modulus AI, Inc. is the first verification body operating under this standard. The requirements are written for any verification body that adopts the standard. In the requirements, "the verification body" means the body applying this standard, and "Modulus" means the publisher. The Program in Clause 8 is the Modulus AI Representation Verification Program.

Conventions. "Shall" states a requirement. "Should" states a recommendation. "May" states a permission. "Can" states a possibility or capability. Notes are informative. Each annex is marked normative or informative in its title. Where a period, interval, count or threshold is stated in the body of the standard, the value in Annex E governs.

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Comments and notices. Comments on the standard may be submitted through modulus.ai/contact. A notice that an entry in a record may be wrong is submitted in accordance with 9.15.

Introduction

0.1 The problem this standard addresses

Artificial intelligence systems answer questions about organizations by assembling material from many sources and treating the organization's own statements as claims rather than facts. When such a system lacks confident knowledge, it supplements what it has with inferences and with older or loosely related material, and it is commonly trained to balance favorable material with unfavorable material. The result can be an answer that is false, unsupported, misleading, or attributed to the wrong organization, delivered privately to a prospective customer, partner, investor, candidate or journalist who has no reason to check it. An organization cannot correct this by publishing more about itself, because its own statements are the category of input these systems discount, and it cannot verify itself, for the same reason that it cannot audit itself.

0.2 What this standard provides

This standard sets requirements for a verification body that establishes facts about organizations from evidence, including audited financial statements and filed records; investigates how AI systems represent those organizations; makes findings about the claims those systems produce; issues the verified facts and findings to the organization as a record that people and AI systems can read and check; publishes the record at the address and to the extent the organization elects; re-verifies it as systems and sources change; and withdraws it when the engagement ends. It defines what counts as evidence, how AI answers are tested and preserved, the categories a finding can take and the evidence each requires, what the organization may and may not do, and how the record is published, maintained and withdrawn.

0.3 Human-led verification

Every verified fact and every finding under this standard is made by a named, competent person who has examined the underlying evidence, and is reviewed by a second person who was not involved in making it. Software, including AI systems, may be used to collect observations, search records, transcribe, translate and draft, and such use is recorded. No fact is verified and no finding is made by software.

0.4 Checkability

The standard is written so that no reader needs to take the verification body's word for an entry. The method is public. The testing protocol is specified so that anyone can reproduce an observation. Every verified fact and every finding states the evidence it rests on and the tier of that evidence, and links to the evidence wherever the organization has permitted disclosure. Every entry is made and reviewed by named, competent people. An entry is published as verified or not at all: the organization decides whether an entry is published and where, and the verification body alone decides what a published entry says. The verification body does not verify itself.

0.5 Relationship to other standards and practice

The principles and structure follow ISO/IEC 17029:2019. The engagement model follows the established practice of certification bodies: a certificate is issued only on evidence, belongs to the client, is shown where the client chooses, and is withdrawn when the engagement ends. The evidence requirements draw on audit and conformity-assessment practice. The structured data requirements use the

schema.org vocabulary, including ClaimReview and Organization, serialized as JSON-LD, so that entries are legible to search and AI systems without special arrangement.

0.6 What a record states

A record states the facts that were verified and the evidence each rests on, the findings made on claims produced by AI systems and the evidence each rests on, and the corrective actions taken and their verified effect. It is confined to factual claims; opinions, forecasts and judgments of quality are outside it. It contains the entries the organization has elected to publish and is not a comprehensive assessment of the organization; nothing is to be inferred from the absence of any matter. Every entry in it can be checked by the reader against the evidence it cites.

1 Scope

- 1.1** This standard specifies principles and requirements for a verification body that:
- a) verifies facts about an organization from evidence (fact verification);
 - b) investigates how AI systems represent that organization, its products, and its people in their organizational roles (representation investigation);
 - c) makes findings about claims produced by AI systems concerning the organization (findings);
 - d) issues verified facts and findings to the subject as a record readable by people and by AI systems, and publishes it as and where the subject elects (the record);
 - e) carries out or directs corrective action where a finding warrants it and verifies the effect (corrective action);
 - f) re-verifies the record as AI systems, model versions and sources change (re-verification); and
 - g) evaluates notices of error, decides appeals and complaints, corrects or withdraws entries found to be wrong, and withdraws records when engagements end (accountability).
- 1.2** This standard applies to factual claims. It does not apply to opinions, forecasts, recommendations, or judgments of quality, and a finding under this standard is not a judgment of quality.
- 1.3** This standard applies to representations produced by AI systems in scope as defined for each record under 8.2, including conversational assistants, AI-augmented search, and systems that embed such models, whether or not the underlying model is named by the system.
- 1.4** This standard applies to organizations of any size, legal form or jurisdiction. Where evidence of a given tier is not available in a jurisdiction, Annex A states the acceptable alternative or excludes the fact from the record.
- 1.5** This standard can be applied by any verification body. The Program in Clause 8 is operated by Modulus AI, Inc.; another body adopting this standard shall operate a program meeting Clause 8.
- 1.6** This standard does not establish requirements for the organizations verified beyond the obligations stated in 9.3 and 10.3, and compliance with those obligations is a condition of the engagement, not a certification of the organization.

2 Normative references

The following documents are referred to in this standard in such a way that some or all of their content constitutes requirements of this standard. For dated references, only the edition cited applies. For undated references, the latest edition applies.

- Annexes A to G of this standard (normative).
- W3C, JSON-LD 1.1: A JSON-based Serialization for Linked Data, W3C Recommendation, 16 July 2020.

- Schema.org vocabulary, types Organization, ClaimReview, Claim, Rating and CreativeWork, as published at schema.org.
- ISO 8601-1:2019, Date and time, Representations for information interchange, Part 1: Basic rules, for all dates and timestamps in records and observations.

NOTE ISO/IEC 17029:2019 and ISO/IEC 17000:2020 are the basis of the structure, principles and vocabulary of this standard and are listed in the Bibliography. They are not normative references.

3 Terms and definitions

For the purposes of this standard, the following terms and definitions apply. Terms from ISO/IEC 17000:2020 are used with their meaning there unless defined here.

- 3.1 AI system** Software that produces natural-language answers using a machine-learned language model, including conversational assistants, AI-augmented search, and products or services that embed such a model, whether or not the model is named to the user.
- 3.2 system in scope** An AI system named in a record as tested under the Program for that record.
- 3.3 major release** A new model version, a change of default model, or a change in retrieval or grounding behavior of a system in scope, announced by its provider or detected under B.6.
- 3.4 provider** The organization that develops or operates an AI system in scope.
- 3.5 organization** A legal entity or other recognized body, together with its products, services and people in their organizational roles.
- 3.6 subject** The organization to which a record relates.
- 3.7 client** The party that engages the verification body for an engagement. The client is the subject unless 9.2.3 applies.
- 3.8 requester** A party other than the subject that requests verification of the subject under 9.2.3.
- 3.9 representation** What an AI system states or implies about an organization in an answer, including what it omits.
- 3.10 claim** A statement about the subject capable of being true or false, whether made by the subject, by an AI system, or by a third-party source.
- 3.11 record disclosure level** The extent to which a record is published, elected by the subject under 9.8: private, addressed or public, as defined in 9.11.2.
- 3.12 verified fact** A claim about the subject that the verification body has established from evidence meeting the tier required by Annex A and has issued as verified.
- 3.13 evidence** Documents, records, observations or testimony on which a verified fact or finding rests.
- 3.14 evidence tier** The classification of evidence in Annex A: tier 1, audited; tier 2, filed; tier 3, primary; tier 4, asserted.
- 3.15 source-obtained evidence** Evidence obtained by the verification body directly from the issuing authority, auditor, register or publisher, rather than from the subject.
- 3.16 documented search** A search of specified registers and sources to establish the absence of a matter, recorded with the sources searched, the terms used, the dates, and the results.
- 3.17 observation** A response of an AI system to a specified question under a specified condition set, captured and preserved as it appeared, with the metadata required by Annex B.
- 3.18 condition set** The combination of question wording, persona, location, date, system version and browsing state under which an observation is made.
- 3.19 finding** The verification body's conclusion about a claim in one or more observations, expressed in a category defined in Annex C.

- 3.20 finding category** One of: false, unsupported, misleading, misattributed, omitted, resolved, recurred, as defined in Annex C.
- 3.21 confirmed adverse claim** A claim unfavorable to the subject that the evidence supports, reported to the subject under C.1.6 and not published.
- 3.22 record** The set of verified facts and findings issued for one subject, with the metadata required by Annex D, delivered to the subject and published at a stable address as and where the subject elects.
- 3.23 verification statement** The statement signed by the lead verifier that issues or re-issues a record, in the form of Annex F.
- 3.24 verifier** A person who meets the competence criteria in 7.3 and carries out fact verification or representation investigation.
- 3.25 lead verifier** The verifier responsible for an engagement and the signatory of its verification statement.
- 3.26 independent reviewer** A verifier who was not involved in the work under review and who performs the review required by 9.9.
- 3.27 evidence custodian** The person responsible for the preservation of evidence and observations under 9.20.
- 3.28 engagement** The agreed scope of work for a subject under 9.3, including its systems in scope, fact types and periods.
- 3.29 Program** The rules in Clause 8 and Annexes A to G under which records are produced. The Program operated by Modulus AI, Inc. is the Modulus AI Representation Verification Program.
- 3.30 corrective action** Action carried out or directed by the verification body, with the subject's approval, to correct a source, to supply verified information to a system or its provider, or to obtain a change from a provider.
- 3.31 re-verification** Repetition of the relevant parts of fact verification and representation investigation to confirm, update or withdraw a record.
- 3.32 notice of error** Information from any person that an entry may be wrong, evaluated under 9.15.
- 3.33 appeal** A request by the subject for reconsideration of a finding, a verified fact, or a decision affecting the subject, under 9.16.
- 3.34 complaint** An expression of dissatisfaction with the conduct of the verification body that is not a notice of error or an appeal, under 9.17.
- 3.35 correction** A change to, or withdrawal of, a verified fact or finding that the verification body has determined to be wrong, under 9.18.
- 3.36 withdrawal** The removal of a record from publication and of the mark from authorization, under 9.19.
- 3.37 evidence disclosure level** The level at which evidence is disclosed in a record: public, described or restricted, as defined in A.4.
- 3.38 reproducibility package** The information, defined in B.7, sufficient for a third party to repeat an observation under the same condition set.

- 3.39** **mark** The Modulus Verified mark, whose use is governed by Annex G.
- 3.40** **impartiality** Presence of objectivity. Objectivity means that conflicts of interest do not exist or are resolved so as not to adversely influence the activities of the verification body.
- 3.41** **conflict of interest** A relationship, interest or activity of the verification body or its personnel that could compromise, or could reasonably appear to compromise, impartiality.
- 3.42** **top management** The person or group that directs and controls the verification body at the highest level.
- 3.43** **human-led** Carried out, decided and signed by a named person who has personally examined the evidence, with any use of software recorded and confined to the uses permitted in 7.5.

4 Principles

4.1 General

The principles in this clause are the basis for the requirements in Clauses 5 to 11. They are not requirements in themselves, but where a situation arises that the requirements do not address, the verification body shall act in accordance with these principles and record its reasoning.

4.2 Impartiality

Verified facts and findings are made on the evidence alone. The verification body, its personnel and its decisions are free of commercial, financial or other pressures that could compromise impartiality, and the body identifies, eliminates or minimizes conflicts of interest on a continuing basis. A finding is never influenced by who is paying for it, by the prospect of future work, or by the subject's reaction to it.

4.3 Competence

Every person who verifies a fact, investigates a representation, makes a finding, reviews a finding or signs a verification statement is demonstrably competent to do so, and the verification body maintains and evaluates that competence.

4.4 Human-led verification

A verified fact or finding is the judgment of a named person who has examined the evidence. Software, including AI systems, assists that judgment and never replaces it. The person is accountable for the judgment and can explain it.

4.5 Evidence-based approach

A claim is verified or a finding is made only on evidence of the kind and tier required by this standard, obtained where possible from its source rather than from the subject, and preserved so that it can be examined again. The absence of a matter is established only by a documented search.

4.6 Consistent operation

The same claim, with the same evidence, under the same conditions, leads to the same verified fact or finding whoever carries out the work. Consistency is achieved through the Program, the decision rules in Annex C, independent review, and the records required by 9.20.

4.7 Openness of method

The method is published, so that any person, including an AI system or its provider, can know how an entry was made and reproduce the observations behind it. Each published entry carries its evidence, so that it can be checked without relying on the verification body's word. Whether a record is published, and where, is the subject's decision; what a published entry says is the verification body's alone.

4.8 Confidentiality

Information obtained in the course of an engagement is held in confidence except as the subject elects to publish it, as the subject otherwise permits, or as the law requires. Nothing is published without the subject's election.

4.9 Responsibility and accountability

The verification body is responsible for every verified fact and finding it issues, for the evidence on which each rests, and for correcting each when it is found to be wrong. Responsibility is not transferred to the subject by the subject's participation, and is not transferred to any contractor.

4.10 Responsiveness

Notices that an entry may be wrong are evaluated promptly whoever sends them, the subject's appeals and any complaints are decided by persons not involved in the matter within published periods, and an entry found to be wrong is corrected or withdrawn.

4.11 Risk-based approach

The depth of verification, the number of observations, the breadth of a documented search and the level of review are proportionate to the consequence of error for the subject, for any third party named, and for those who rely on the record.

4.12 Separation of roles

The verification body does not verify itself, does not provide marketing, advertising, search optimization, content or public relations services to any organization it verifies, and describes its own status accurately.

5 General requirements

5.1 Legal entity

- 5.1.1** The verification body shall be a legal entity, or a defined part of a legal entity, such that it can be held legally responsible for its verification activities.
- 5.1.2** The verification body shall publish its legal name, jurisdiction of formation, registered address and the identity of its top management.
- NOTE** Modulus AI, Inc. is a corporation with its principal place of business in Scottsdale, Arizona, United States, and an affiliate of Modulus Financial Engineering, Inc. and Modulus Global, Inc.

5.2 Responsibility for verified facts, findings and records

- 5.2.1** The verification body shall have sole responsibility for every verified fact, finding and record it issues or publishes, for the verification statement that issues it, and for the evidence on which it rests.
- 5.2.2** The verification body shall retain authority over all decisions relating to verification, including the acceptance or rejection of evidence, the assignment of a finding category, the content of every entry, and the decision to correct or withdraw an entry. Whether a record is published, and at which disclosure level, is elected by the subject under 9.8 and 9.11.
- 5.2.3** Participation by the subject under 9.8, by a requester under 9.2.3, or by any contractor shall not transfer or dilute this responsibility.
- 5.2.4** Every verified fact and finding shall be traceable to the named lead verifier who made it, the named independent reviewer who reviewed it, the evidence on which it rests, and the version of this standard under which it was made.

5.3 Management of impartiality

- 5.3.1** Top management shall commit in writing to impartiality in all verification activities, and shall publish that commitment.
- 5.3.2** The verification body shall identify, analyze and document, on a continuing basis and at least annually, the risks to its impartiality arising from its activities, its relationships, the relationships of its personnel, its ownership, its sources of revenue, and its affiliates. Where a risk is identified, the body shall demonstrate how it eliminates or minimizes it. The analysis shall be available to the impartiality review in 6.3.
- 5.3.3** The verification body shall not provide, and shall not through an affiliate or a related person provide, marketing, advertising, search engine or AI search optimization, content creation, public relations, reputation management, or review solicitation services to any organization it verifies, or to an affiliate of that organization, during the engagement and for twelve months after the record is withdrawn.
- 5.3.4** Fees for verification shall be agreed before work begins and shall be determined by scope, not by outcome. The verification body shall not accept any fee, bonus, commission, equity, or other consideration that depends on the content of a verified fact or finding, on the subject's satisfaction with it, or on any change in an AI system's answers.

- 5.3.5** The verification body shall not verify itself, its affiliates, its owners, or any organization in which the body, its top management or its personnel hold a financial interest, and shall not verify an organization that is a provider of a system in scope for that record.
- 5.3.6** Personnel shall declare, before assignment to an engagement and whenever circumstances change, any relationship, financial interest, prior employment, or other circumstance that could compromise or appear to compromise their impartiality with respect to the subject, a requester, a named third party, or a provider. A person who has been employed by, consulted for, or held a financial interest in the subject within the preceding two years shall not be assigned to that subject's engagement.
- 5.3.7** The verification body shall not permit any person or organization outside the body to exert commercial, financial or other pressure on a verified fact or finding, and shall record and report to the impartiality review any attempt to do so.
- 5.3.8** Where the verification body, its affiliates, or its personnel hold patents, licenses, commercial agreements, or financial interests involving a provider of a system in scope, those relationships shall be disclosed on every record in which that system is in scope.
- 5.3.9** The subject's ability to decline publication of an entry, or to end the engagement, shall not affect the content of any entry issued, and the verification body shall not alter an entry at the subject's request on any ground other than evidence.

5.4 Liability and financing

- 5.4.1** The verification body shall evaluate the risks arising from its verification activities and shall have adequate arrangements, such as insurance or reserves, to cover liabilities arising from its operations in the territories in which it operates.
- 5.4.2** The verification body shall have the financial stability and resources required to operate the Program, including the preservation of evidence and observations for the periods in Annex E, independently of the continuation of any single engagement.
- 5.4.3** Engagement agreements shall limit the verification body's liability to the subject to the fees paid by the subject in the twelve months preceding the event giving rise to the claim, shall exclude liability to any person other than the subject to the fullest extent the law permits, and shall state that a record is issued for the subject's use, that no other person may rely on it as against the verification body, and that it is not an audit opinion, a certification of the subject or legal advice. Every published record shall carry the notice required by D.2.1 to the same effect.

5.5 Legal review

- 5.5.1** Before publication, every entry that names an organization or person other than the subject in connection with an unfavorable matter, and every entry the lead verifier or the Program manager refers, shall be reviewed by a person with legal competence who is not the lead verifier, to confirm that the statement is supported by the evidence and is expressed as a statement of fact supported by that evidence.
- 5.5.2** Legal review shall not alter an entry on grounds other than the sufficiency of evidence and the accuracy of expression. Where legal review and the lead verifier disagree, the matter shall be referred to top management and the decision and its reasons recorded.

- 5.5.3** A finding of misattributed that identifies the organization to which a claim properly relates shall state that organization only where the identification rests on tier 2 evidence or a documented search, and shall be reviewed under 5.5.1.

6 Structural requirements

6.1 Organizational structure and top management

- 6.1.1** The verification body shall document its organizational structure, showing the duties, responsibilities and authorities of top management, of the roles named in 7.2, and of any committee or review mechanism, and the relationship between the body and any affiliate that provides services to it.
- 6.1.2** Top management shall have overall authority and responsibility for the development and maintenance of this standard as applied by the body, the Program, the impartiality of the body, the competence of personnel, the decision to issue, correct or withdraw a record, and the handling of notices of error, appeals and complaints.
- 6.1.3** Top management shall designate one person as responsible for the Program (the Program manager) and one person as evidence custodian. Where the body is small, one person may hold more than one role, but the lead verifier and the independent reviewer of the same engagement shall never be the same person, and the person deciding an appeal shall not have been involved in the matter appealed.

6.2 Operational control

- 6.2.1** The verification body shall have documented procedures for every activity in Clause 9, shall apply them consistently at every location from which it operates, and shall retain control over the content of every record wherever the work is performed.
- 6.2.2** Where any activity is performed by a contractor under 7.6, the verification body shall retain control of the activity, review its output, and remain responsible for it.

6.3 Impartiality review

- 6.3.1** Top management shall review impartiality at least annually, separately from the management of engagements. The review shall consider the impartiality risk analysis in 5.3.2, the declarations in 5.3.6, any reported pressure under 5.3.7, the fee arrangements in 5.3.4, and the handling of notices of error, appeals and complaints, and shall record its conclusions and the actions taken.
- 6.3.2** Where the review concludes that a risk to impartiality has not been adequately addressed, top management shall act on the conclusion and record the action.

7 Resource requirements

7.1 General

- 7.1.1** The verification body shall have the personnel, evidence-preservation facilities, access to registers and sources, and access to the AI systems in scope that are necessary to operate the Program for every engagement it accepts.
- 7.1.2** The verification body shall not accept an engagement for which it lacks a competent lead verifier, a competent independent reviewer, lawful access to the systems in scope, or the ability to obtain tier 1 or tier 2 evidence in the subject's jurisdiction, unless the engagement is limited to fact types for which the available evidence is adequate under Annex A.

7.2 Personnel and roles

- 7.2.1** The verification body shall define and document the following roles and assign them to named persons for every engagement:
- lead verifier, responsible for the engagement and signatory of the verification statement;
 - verifier, who carries out fact verification and representation investigation under the lead verifier;
 - independent reviewer, who performs the review in 9.9;
 - evidence custodian, responsible for preservation under 9.20;
 - legal reviewer, who performs the review in 5.5; and
 - Program manager, responsible for the Program under Clause 8.
- 7.2.2** Every person in these roles shall be bound by a written agreement to act impartially, to keep information confidential, and to declare conflicts of interest under 5.3.6, whether an employee or a contractor.
- 7.2.3** The verification body shall maintain, for each person, a record of qualifications, training, experience, competence evaluations, authorizations by role and fact type, and declarations of interest.

7.3 Competence criteria

- 7.3.1** A verifier shall demonstrate, before authorization and by evaluation under 7.4, competence in each of the following:
- a) the evidence requirements of Annex A, including the ability to read audited financial statements, identify the auditor's report and opinion type, trace a figure to the statements, and recognize consolidated and standalone presentations;
 - b) the identification, retrieval and interpretation of filed records in the jurisdictions in which the verifier is authorized, including corporate registers, court records and regulator registers, and the conduct of a documented search;
 - c) the testing protocol of Annex B, including the construction of condition sets, the capture and preservation of observations, and the detection of personalization and caching effects;

- d) the behavior of AI systems in scope, including retrieval-grounded and parametric answering, the influence of source material and model version on answers, and the distinction between a source-driven, a model-driven and a gap-driven representation;
- e) the finding categories and decision rules of Annex C;
- f) the recognition of name collision and misattribution between organizations; and
- g) the drafting of verified facts and findings in the form required by Annex D.

7.3.2 A lead verifier shall additionally demonstrate at least two years of relevant investigative, research, audit, compliance, legal or journalistic experience, and completion of at least three engagements under supervision.

7.3.3 An independent reviewer shall meet the criteria for a lead verifier.

7.3.4 A legal reviewer shall hold a legal qualification in a jurisdiction relevant to the publication of the record, or shall act under the supervision of a person who does.

7.3.5 Verifiers shall be authorized by jurisdiction for tier 2 evidence and by fact type for Annex A, and shall not verify outside their authorization.

7.3.6 Transitional provision

Until the verification body has completed five engagements under this standard, the Program manager may authorize a lead verifier and an independent reviewer on the basis of the experience required by 7.3.2 without completion of supervised engagements. Each such authorization shall be recorded with its basis. This provision expires on the completion of the fifth engagement.

7.4 Competence management

7.4.1 The verification body shall document a process for the initial evaluation, authorization, monitoring and re-evaluation of the competence of every person in a role under 7.2.

7.4.2 Initial evaluation shall include examination of evidence of qualification and experience, a written or practical test against 7.3.1, and supervised performance on live engagements.

7.4.3 Monitoring shall include review of each verifier's work by the independent reviewer on every engagement, and periodic review by the Program manager of a sample of each verifier's verified facts and findings, including every entry that was corrected or withdrawn.

7.4.4 Re-evaluation shall occur at least every two years, on each change of this standard that affects the verifier's role, and after any correction or withdrawal attributable to the verifier.

7.4.5 Personnel shall receive training on each major release of a system in scope that changes the behavior relevant to Annex B, and on each new jurisdiction for which they are authorized.

7.5 Use of software and AI systems by personnel

7.5.1 Personnel may use software, including AI systems, to collect observations under Annex B, to search registers and sources, to transcribe, translate and summarize documents, to detect candidate claims in observations, and to draft text for human revision.

7.5.2 No software shall verify a fact, assign a finding category, accept or reject evidence, decide whether a documented search is complete, decide to issue, correct or withdraw an entry, or sign a verification statement. Each of these shall be done by the named person responsible.

- 7.5.3** A verifier shall personally examine the underlying evidence for every verified fact and finding, and shall not rely on a summary, translation or extraction produced by software without examining the source it was produced from.
- 7.5.4** Where software has been used in the preparation of a verified fact or finding, the record of the engagement shall identify the software, its version where available, and the use made of it. Where an AI system has been used to assist with a record in which that same system is in scope, the record shall disclose this.
- 7.5.5** Software used to collect observations shall be validated under B.8 before use and after each change, and the validation shall be recorded.

7.6 Outsourcing

- 7.6.1** The verification body may contract with external persons or bodies for the retrieval of filed records, certified translation, legal review, and the collection of observations under Annex B, provided that the body has a written agreement with the contractor covering impartiality, confidentiality and conflicts of interest, evaluates and records the contractor's competence, and reviews the contractor's output before relying on it.
- 7.6.2** The verification body shall not outsource the verification of a fact, the assignment of a finding category, the independent review, the decision to correct or withdraw an entry, or the signature of a verification statement.
- 7.6.3** The verification body shall inform the subject of any contractor that will have access to the subject's confidential information, and shall obtain the subject's consent where the engagement agreement requires it.

8 Program requirements

8.1 General

- 8.1.1** The verification body shall operate a documented program that defines the systems in scope, the fact types in scope, the evidence requirements, the testing protocol, the finding categories, the record format, the periods and intervals, and the use of the mark. The Program operated by Modulus AI, Inc. under this standard is the Modulus AI Representation Verification Program, and its rules are Clauses 8 and 9 together with Annexes A to G.
- 8.1.2** The Program shall be published in full. No rule of the Program shall be confidential.
- 8.1.3** The Program manager shall be responsible for the maintenance of the Program, for change control under 8.9, and for the consistency of its application across engagements.

8.2 Systems in scope

- 8.2.1** Each engagement shall name the systems in scope for its record. The default set of systems is published by the verification body and reviewed at least quarterly. At the date of this edition the default set is: ChatGPT, Claude, Gemini, Perplexity, Copilot, Grok, Meta AI, DeepSeek, Qwen Chat, Kimi, and Duck.ai, together with AI-augmented search features of general web search engines.
- 8.2.2** A system may be added to an engagement's scope at the subject's request or on the verification body's recommendation. A system shall be removed from scope only where lawful access is no longer available or the system is discontinued, and the record shall state the date of removal.
- 8.2.3** Where a system in scope embeds a model operated by another provider, the record shall state both the system and, where determinable, the underlying model and version.

8.3 Fact types in scope

- 8.3.1** The fact types that may be verified, and the evidence each requires, are listed in Annex A. Fact types not listed in Annex A shall not be included in a record.
- 8.3.2** The following are out of scope and shall not be the subject of a verified fact or finding: opinions and reviews as such; forecasts; claims of quality, superiority or suitability; the content of confidential settlements except for the fact and date of resolution where that fact is itself on a public register; and claims about natural persons other than in their organizational roles.

8.4 Evidence requirements

- 8.4.1** Evidence shall be classified and accepted according to Annex A. A verified fact shall state its evidence tier. A claim supported only by tier 4 evidence shall not be included in a record.
- 8.4.2** Evidence shall be obtained from its source wherever the source makes it available. Where evidence is received from the subject, the verification body shall confirm it against the source where possible and shall record where this was not possible and why.
- 8.4.3** The absence of a matter, including the absence of litigation, regulatory action, insolvency proceedings, sanctions, or license revocation, shall be established only by a documented search meeting A.3.

8.5 Testing protocol

- 8.5.1 Observations of AI systems shall be made, captured and preserved in accordance with Annex B. An observation that does not meet Annex B shall not be relied on for a finding.
- 8.5.2 The questions used shall be derived from the decisions that a buyer, partner, investor, lender, candidate, regulator or journalist would make about the subject, and shall include at least the question families in B.2.
- 8.5.3 Every finding shall be supported by the minimum number of observations and condition sets stated in Annex E for its category.

8.6 Finding categories

- 8.6.1 Every finding shall be assigned exactly one category from Annex C by applying the decision rules in C.3. Where two categories could apply, the rule of precedence in C.4 shall be applied and the reasoning recorded.
- 8.6.2 A confirmed adverse claim shall be reported to the subject under C.1.6 and shall not be published.

8.7 Record and publication

- 8.7.1 Every record shall be issued to the subject in the form required by Annex D, in human-readable form and as structured data, and shall be published only at the disclosure level the subject elects under 9.8 and 9.11. A published record shall remain at its stable address through all re-verifications and corrections until it is withdrawn.
- 8.7.2 Every verified fact and finding shall carry the metadata required by D.3, including its evidence, evidence tier, evidence disclosure level, method version, the version of this standard, the date of issue and the next re-verification date.

8.8 Periods, intervals and counts

- 8.8.1 The periods, intervals, counts and thresholds that govern the Program are stated in Annex E. Where a value in the body of this standard and a value in Annex E differ, Annex E governs.

8.9 Program change control

- 8.9.1 A change to the Program, including a change to any annex, shall be documented with its reasons, approved by top management, assigned a version number and effective date under 10.6, and published before it takes effect.
- 8.9.2 A finding or verified fact shall state the version of the Program under which it was made. A change to the Program shall not alter a published finding; where a change would lead to a different finding on the same evidence, the finding shall be re-made at the next re-verification under the new version and both versions shall remain visible in the record's history.
- 8.9.3 A change to the default systems in scope under 8.2.1 is a Program change under this clause.

9 Process requirements

9.1 General

- 9.1.1** The verification body shall carry out every engagement in the sequence of this clause and shall document each step. No step shall be omitted. Steps 9.5 and 9.6 may run in parallel.
- 9.1.2** The lead verifier shall be assigned before 9.2.4 and shall be responsible for the engagement from that point until the record is withdrawn or responsibility is formally transferred to another lead verifier and recorded.

9.2 Pre-engagement

- 9.2.1** Before accepting an engagement, the verification body shall obtain sufficient information to determine the subject's legal identity and jurisdiction, the fact types and systems to be in scope, the languages and markets concerned, the availability of tier 1 and tier 2 evidence, any known matters likely to be confirmed under C.1.6, and any relationship between the subject and the verification body, its affiliates or its personnel.
- 9.2.2** The verification body shall perform a conflict-of-interest check against 5.3 for the body and for every person proposed for the engagement, and shall record the result.
- 9.2.3** An engagement may be requested by the subject, or by a requester with a legitimate interest in the subject, such as a prospective investor, acquirer, lender or counterparty. Where a requester engages the verification body, the subject shall be notified before any observation is published and shall have the participation rights in 9.8; the requester shall have no participation rights beyond defining the scope and receiving the record. The verification body shall not issue a record, and shall not publish a verified fact or finding, concerning an organization that has neither engaged it nor been the subject of such a request. Assessments prepared before an engagement, including findings presented to a prospective subject, are confidential to that organization and shall not be published.
- 9.2.4** The verification body shall decline an engagement where a conflict under 5.3 cannot be resolved, where 7.1.2 applies, or where the purpose of the engagement appears to be to obtain a record for use in a dispute in which the verification body would not be impartial.
- 9.2.5** Before the engagement agreement is signed, the verification body shall provide the subject with this standard, the Program, the fee, the proposed scope, the periods in Annex E, the disclosure levels in 9.11, and a plain-language statement that the subject elects whether and where each entry is published, that the content of an entry is not negotiable, and that a confirmed adverse claim is reported to the subject and not published.

9.3 Engagement

- 9.3.1** Every engagement shall be governed by a written agreement that states:
- a) the subject's legal name, jurisdiction and registered identifiers;
 - b) the systems in scope, fact types in scope, languages and markets;
 - c) the fee and the statement that the fee does not depend on findings;

- d) the subject's obligations under 9.3.2;
- e) the subject's rights under 9.8 and 9.16;
- f) the subject's election of record disclosure level under 9.11, which it may change under 9.8.5, and the withdrawal of the record under 9.19 when the engagement ends;
- g) the evidence disclosure level that will apply to each category of evidence;
- h) the limits of liability and the reliance terms under 5.4.3; and
- i) the fees, the consequences of non-payment under 9.19, and the conditions of termination.

9.3.2 The subject shall undertake to provide the evidence it holds that is required by Annex A for the fact types in scope, to permit the verification body to obtain evidence directly from its auditors, registrars and regulators where this requires the subject's authorization, to confirm facts and approve entries within the periods in Annex E, to approve or decline each corrective action proposed under 9.12, to inform the verification body of any change in the facts verified, and not to misrepresent the record, an unpublished or withdrawn entry, or the mark.

9.3.3 The subject elects whether each entry is published and at which disclosure level. The subject shall not alter the content of an entry, shall not represent an unpublished, suspended or withdrawn entry as verified, and shall not represent the record as a comprehensive assessment of the subject. No fee shall be conditioned on the content of any entry.

9.4 Planning

9.4.1 The lead verifier shall prepare a verification plan before fact verification or representation investigation begins. The plan shall identify the verification team and their authorizations, the fact types in scope and the evidence expected for each, the jurisdictions and registers for documented searches, the systems in scope and the condition sets to be used, the question families under B.2 and any additions specific to the subject, the known or suspected matters to be examined, the evidence disclosure levels, and the risk-based depth of work under 4.11.

9.4.2 The plan shall be reviewed by the independent reviewer before work begins and shall be revised and re-reviewed when scope changes.

9.5 Fact verification

9.5.1 For each fact type in scope, the verifier shall obtain evidence meeting the tier required by Annex A, from the source wherever the source makes it available, and shall record the source, the date obtained, and the means of obtaining it.

9.5.2 For financial facts, the verifier shall obtain the complete audited financial statements including the auditor's report; shall confirm the identity of the auditor and its registration or license with the relevant professional or regulatory body; shall record the period covered, the reporting framework, the currency, whether the statements are consolidated or standalone, and the type of opinion; shall trace the figure claimed to the statements; and shall record any qualification, emphasis of matter, going-concern reference or restatement. A figure derived by calculation from the statements shall be published with the calculation.

9.5.3 For counts of customers, users, employees, locations or similar, the verifier shall require an audited figure, an independent attestation or agreed-upon-procedures report by a licensed

practitioner, or a figure disclosed in a filing subject to regulatory oversight. Management counts shall not be included in the record.

- 9.5.4** For identity, formation, location, standing, ownership, officers, licenses and registrations, the verifier shall obtain the filed record from the register, shall record its date, and shall not rely on a copy supplied by the subject without comparison to the register where the register is accessible. Certificates of good standing or their equivalent shall be no older than the period in Annex E at the date of verification.
- 9.5.5** For claims of legal or regulatory action, or their absence, the verifier shall conduct a documented search meeting A.3 across the jurisdictions of formation, principal place of business and principal operations, and any jurisdiction named in the claim, and shall record every source searched, the terms used, the date, and the result, including nil results.
- 9.5.6** For product, capability and history claims, the verifier shall obtain contemporaneous primary documents and shall not rely on the subject's website, marketing material or press releases, which are tier 4.
- 9.5.7** Documents in a language in which the verifier is not competent shall be translated by a certified translator under 7.6 or by software under 7.5, in which case the verifier shall confirm every figure, date, name and identifier against the original.
- 9.5.8** Where the evidence available does not meet the required tier, the fact shall not be included in the record, and the verification body shall tell the subject what evidence would be required.

9.6 Investigation of AI representations

- 9.6.1** The verifier shall collect observations of every system in scope in accordance with Annex B, using the question families in B.2 and the condition sets in B.3, and shall preserve every observation under 9.20 before any analysis begins.
- 9.6.2** The verifier shall personally read every observation relied on, shall identify each claim about the subject that it contains, and shall record each claim with the observations in which it appears.
- 9.6.3** For each claim, the verifier shall determine whether the representation is source-driven (traceable to identifiable third-party material that the system cites or that can be shown to be retrieved), model-driven (not traceable to retrieved material and persisting across condition sets with browsing disabled or sources unavailable), or gap-driven (arising from the absence of material about the subject, including by omission or by substitution of a different organization), and shall record the evidence for that determination.
- 9.6.4** Where a claim appears to concern a different organization, the verifier shall identify the candidate organizations, compare identifiers, and record the basis for any conclusion of misattribution under C.2.
- 9.6.5** An explanation given by an AI system for its own answer may be recorded as an observation but shall not be treated as evidence of the cause of the representation.

9.7 Findings

- 9.7.1** For each claim identified under 9.6.2, the lead verifier shall assign a finding category under Annex C, shall record the evidence on which the finding rests, the evidence tier, the

observations supporting it, the determination under 9.6.3, and the reasoning, and shall confirm that the minimum observation counts in Annex E are met.

- 9.7.2** A finding of false shall rest on tier 1 or tier 2 evidence or on a documented search. A finding of unsupported shall rest on a documented search that found no evidence and shall state that it is not a finding of falsity. A finding of misleading shall identify the true elements and the false conclusion. A finding of misattributed shall meet 5.5.3. A confirmed adverse claim under C.1.6 shall rest on evidence of the same tier that a finding of false would require and shall be reported to the subject in writing. A finding of resolved shall state the date and evidence of resolution. A finding of recurred shall identify the prior finding and the corrective action that preceded it. A finding of omitted shall rest on verified facts establishing that the subject meets the requirements stated in the question and on observations meeting B.9.2.
- 9.7.3** Every finding shall be written in the form required by Annex D, stating the claim as observed, the category, the finding in one sentence, the evidence, and the systems and dates of observation.

9.8 Subject approval and election of disclosure

- 9.8.1** Before any entry is issued, the verification body shall provide it to the subject in its proposed form, with the evidence relied on, and the subject shall have the period in Annex E to supply further evidence, to confirm the facts, and to elect whether the entry is published and at which disclosure level under 9.11.2.
- 9.8.2** Evidence supplied during the approval period shall be evaluated under 9.5 and may change an entry. The subject may decline publication of any entry. The subject shall not change the content of an entry; an entry is issued as the verification body has made it or not at all.
- 9.8.3** A confirmed adverse claim under C.1.6 shall be reported to the subject in writing with the evidence, shall not be issued as an entry, and shall not be published. The subject may request a finding of resolved under C.1.7 once the matter is resolved with evidence.
- 9.8.4** An entry the subject has not approved within the period in Annex E shall not be published; it may be re-presented for approval after re-verification.
- 9.8.5** The subject may at any time change the disclosure level of its record or of any entry, or withdraw any entry from publication, by written notice; the verification body shall give effect to the notice within the period in Annex E.

9.9 Independent review

- 9.9.1** Before issue, every verified fact and finding shall be reviewed by an independent reviewer who was not involved in making it. The reviewer shall examine the evidence, confirm that the required tier and minimum observations are met, confirm that the decision rules in Annex C were correctly applied, confirm that the subject's approval and election under 9.8 were recorded, confirm that any required legal review under 5.5 was completed, and record the result.
- 9.9.2** Where the reviewer disagrees with the lead verifier, the disagreement and its resolution shall be recorded. Where it is not resolved, the matter shall be referred to the Program manager, and if still unresolved to top management, whose decision and reasons shall be recorded. A finding on which the reviewer's disagreement is unresolved shall not be published.

- 9.9.3** For a finding that rests on a corrective action carried out by the verification body under 9.12, the reviewer shall additionally confirm that the pre-defined test in 9.12.3 was applied and that the observations post-date the action.

9.10 Decision and issue of the verification statement and record

- 9.10.1** The decision to issue, re-issue, correct or withdraw a record shall be taken by the lead verifier and recorded in a verification statement in the form of Annex F, signed by the lead verifier and countersigned by the independent reviewer.
- 9.10.2** The verification statement shall list every verified fact and finding it issues, the disclosure level elected for each, the version of this standard and of the Program applied, the systems in scope, the period of observation, and the next re-verification date, and shall be delivered to the subject.

9.11 Delivery and publication

- 9.11.1** The record and the verification statement shall be delivered to the subject on issue. Entries the subject has elected to publish shall be published within the period in Annex E after the verification statement is signed, at the record's stable address, in the form required by Annex D.
- 9.11.2** The subject elects one of three record disclosure levels, and may elect a lower level for any individual entry:
- a) Private: the record is delivered to the subject and is not published. The subject may share it as it chooses.
 - b) Addressed: the record is published at a stable address that is not linked from, listed on, or included in the sitemap of the verification body's website, and is reached through the subject's own website, llms.txt file or other link. The verification body shall not disclose the address or the existence of the record.
 - c) Public: the record is published at a stable address that may be indexed, and the subject consents to the verification body naming it as a verified organization.
- 9.11.3** Each published finding shall be published on its own page under the record, with a title that states the claim and the category, so that it can be retrieved by a query about that claim.
- 9.11.4** Published records shall carry the structured data in D.4, shall be retrievable by the search and AI systems named in the Program, and shall not be placed behind authentication or consent walls or excluded by robots directives, except that addressed records shall be excluded from the verification body's sitemap and shall not be linked from its website.
- 9.11.5** A published record shall show the date of issue, the date of last re-verification, the next re-verification date, and the version of each entry; superseded versions of an entry shall be retained by the verification body and provided to the subject on request.
- 9.11.6** Every published record shall carry the scope notice and the reliance notice required by D.2.1.

9.12 Corrective action and verification of effect

- 9.12.1** Where a finding of false, unsupported, misleading, misattributed or recurred is issued, the lead verifier shall identify the corrective actions available, which may include a request for

correction to the publisher of a source, a report through a platform's own process, the supply of the verified record to a system or its provider, updates to the subject's own properties, and a documented submission to the provider of a system in scope, with formal notice through counsel where warranted. Each proposed action shall be presented to the subject with its basis, and no action shall be taken without the subject's approval.

- 9.12.2** Corrective action shall be carried out or directed by the verification body and recorded with its date, the party addressed, the evidence supplied, and the response received. Correspondence with a provider shall attach or reference the finding and shall be retained under 9.20.
- 9.12.3** Before a corrective action is carried out, the lead verifier shall define in writing the test by which its effect will be judged: the systems, condition sets, question families, observation counts and period that will be used, and the result that will be taken as showing that the representation has changed. The test shall not be altered after the action is taken.
- 9.12.4** The effect of a corrective action shall be verified by observations made after the action under the pre-defined test, by a verifier other than the person who carried out the action where the finding is consequential or the subject so requests. The record shall state whether the representation changed, partly changed, or did not change, and a representation that did not change shall not be described as corrected.
- 9.12.5** The verification body shall distinguish in the record between a change in representation that followed a corrective action and a change that coincided with a major release or other event, and shall not attribute a change to its own action where the evidence does not support that attribution.

9.13 Re-verification

- 9.13.1** Every record shall be re-verified at the intervals in Annex E, within the period in Annex E after a major release of a system in scope, and within the period in Annex E after each corrective action is completed. Re-verification shall repeat the observations under Annex B for every finding in the record and shall re-examine the evidence for every verified fact whose evidence has a date or period, including good standing, licenses and audited figures.
- 9.13.2** On re-verification, each finding shall be confirmed, revised, marked resolved, or marked recurred, and each verified fact shall be confirmed, revised, or withdrawn where current evidence no longer meets the required tier. The record shall state the date of re-verification and the next re-verification date.
- 9.13.3** A re-verification that changes a finding or a verified fact shall follow 9.8 and 9.9 for the change and shall be issued under a new verification statement.

9.14 Facts discovered after issue

- 9.14.1** Where, after issue, the verification body becomes aware of evidence or an observation that calls a verified fact or finding into question, whether from the subject, a notice of error, re-verification, or any other source, the lead verifier shall evaluate it within the period in Annex E and shall either confirm the record with reasons, issue a correction under 9.18, or re-open the finding and follow 9.5 to 9.10.
- 9.14.2** Where the matter exposes a third party to imminent harm, the verification body shall suspend publication of the affected entry pending evaluation and shall inform the subject.

9.15 Notices of error

- 9.15.1** Any person may notify the verification body that an entry may be wrong, through the contact point published under 10.1.1, stating the entry and the ground and supplying any evidence relied on. No fee and no relationship with the verification body shall be required.
- 9.15.2** The verification body shall acknowledge a notice within the period in Annex E, shall evaluate it under 9.14 through a verifier not involved in the entry, and shall record the notice, the evaluation and the outcome. Where the evaluation results in a correction or withdrawal, 9.18 applies. The verification body is not required to publish the notice or the outcome, and shall inform the subject of every notice concerning its record.

9.16 Appeals

- 9.16.1** The subject may appeal a verified fact, a finding, a refusal to issue an entry, a correction, or a withdrawal, within the period in Annex E after notice of the matter appealed, by stating the grounds and supplying any evidence relied on.
- 9.16.2** An appeal shall be decided by a person who was not involved in the matter appealed and who is not subordinate to the lead verifier concerned, within the period in Annex E. The decision and its reasons shall be given to the subject in writing and recorded.
- 9.16.3** An appeal shall not of itself suspend publication of an entry; the subject may withdraw any entry from publication under 9.8.5 while an appeal is pending.

9.17 Complaints

- 9.17.1** Any person may complain about the conduct of the verification body or its personnel through the contact point published under 10.1.1. The verification body shall acknowledge the complaint within the period in Annex E, shall investigate it through a person not involved in the matter complained of, shall respond within the period in Annex E, and shall record the complaint, the investigation and the outcome. A description of the complaints process shall be available on request.
- 9.17.2** A complaint that reveals a nonconformity with this standard shall be handled under 11.6.

9.18 Corrections

- 9.18.1** Where a verified fact or finding is determined to be wrong, in whole or in part, it shall be corrected or withdrawn within the period in Annex E, the subject shall be notified in writing with the reason, and the superseded version shall be retained under 9.20 and provided to the subject on request.
- 9.18.2** A correction shall be made with the same review under 9.9 as the original and shall be issued under a new verification statement.
- 9.18.3** Where a corrected or withdrawn entry had been supplied to a provider, publisher or platform in a corrective action, the verification body shall notify that party.
- 9.18.4** A change that results only from a change in the facts is a re-verification under 9.13, not a correction.

9.19 Suspension, withdrawal and termination

- 9.19.1** A record is maintained only while an engagement is in force and the fees due under it are paid. Where fees remain unpaid after the notice period in Annex E, the verification body shall suspend the record: the published record shall display the status suspended, the mark shall cease to be authorized, and no re-verification shall be performed. Where fees remain unpaid for the further period in Annex E, the record shall be withdrawn.
- 9.19.2** On expiry or termination of the engagement by either party, the record shall be withdrawn on the effective date: the published record and its finding pages shall be removed from publication, the mark shall cease to be authorized, and the lookup under 10.1.3 shall report the record as withdrawn for the period in Annex E and thereafter report nothing.
- 9.19.3** The subject may retain copies of verification statements and records delivered to it, each of which bears its date of issue and next re-verification date, and shall not represent a withdrawn or suspended record or entry as current or as verified.
- 9.19.4** The verification body shall terminate an engagement and withdraw the record where the subject materially breaches 9.3.2 or 9.3.3, misuses the mark under Annex G, or attempts to influence an entry under 5.3.7, and shall record the reason.
- 9.19.5** The verification body shall withdraw an entry or a record at the subject's written request at any time, within the period in Annex E, and shall withdraw a record of its own motion where it was issued in breach of 5.3.5.

9.20 Records and evidence preservation

- 9.20.1** The verification body shall retain, for every engagement, the engagement agreement, the conflict check, the verification plan, every item of evidence obtained with its source and date, every documented search, every observation with its metadata and capture, every reproducibility package, every finding with its reasoning, the subject's responses under 9.8, the independent review, the legal review, every verification statement, every corrective action and its correspondence, every notice of error, appeal and complaint with its outcome, and every correction or withdrawal.
- 9.20.2** Observations and evidence shall be preserved as obtained, with a cryptographic hash and timestamp recorded at capture, in a form that prevents undetected alteration, under the control of the evidence custodian, with access logged.
- 9.20.3** Records shall be retained for the period in Annex E after the record is withdrawn, or longer where an appeal, complaint or legal proceeding concerning the record is pending, and shall be held in confidence under 10.4.
- 9.20.4** Where a court, regulator or provider lawfully requests the evidence for a finding, the verification body shall supply it in the form preserved, with its hash and chain of custody.

10 Information requirements

10.1 Publicly available information

- 10.1.1** The verification body shall publish, without charge and without registration, at least: this standard and the Program in every version with its effective dates; the default systems in scope; the identity of top management; the impartiality commitment under 5.3.1; the disclosures under 5.3.8; the fee principle under 5.3.4; the contact point for notices of error and complaints; and the lookup under 10.1.3.
- 10.1.2** The verification body shall not publish a register, directory or list of subjects, and shall not name a subject as verified, except where the subject has elected the public disclosure level.
- 10.1.3** The verification body shall provide a lookup by which any person holding a record address or record identifier can confirm whether that record is current, suspended or withdrawn, its date of issue, its next re-verification date, and the version of this standard under which it was issued. The lookup shall return nothing for an identifier that does not correspond to a published record.

10.2 Machine-readable publication

- 10.2.1** Each published record and each finding page shall carry structured data conforming to D.4, using the schema.org vocabulary serialized as JSON-LD, including Organization for verified facts and ClaimReview for findings, with the extension properties defined in D.5.
- 10.2.2** The verification body shall publish, at the well-known address stated in Annex D, a machine-readable index of the standard, the Program, the lookup, the JSON schema and the JSON-LD context, so that an AI system or its developer can locate and check the basis of any published entry without human assistance. The index shall not list records.
- 10.2.3** The verification body shall not use robots directives, access controls or technical measures that exclude the search or AI systems named in the Program from retrieving the standard, the index, or published records, subject to 9.11.4.

10.3 Reference to verification and use of the mark

- 10.3.1** The subject may state that it is verified under this standard, and may display the mark, only in accordance with Annex G, only while its record is current, only with a link to its record where the record is published, and only in a way that does not imply that the verification body endorses the subject, its products or its conduct, or that any matter not in the record has been verified.
- 10.3.2** The verification body shall monitor use of the mark and of references to verification, shall require correction of misuse, and shall terminate the engagement under 9.19.4 for persistent misuse.
- 10.3.3** Neither the subject nor the verification body shall describe a record as an audit, an audit opinion, an accreditation, or a certification of the subject.

10.4 Confidentiality

- 10.4.1** The verification body shall hold in confidence all information obtained in an engagement, including the existence of the engagement, the identity of the subject, every entry the subject has not elected to publish, a confirmed adverse claim, evidence at the described or restricted disclosure level, and the subject's internal documents, and shall bind its personnel and contractors accordingly. Information is disclosed only as the subject elects under 9.8 and 9.11, as the subject otherwise permits in writing, or as the law requires.
- 10.4.2** Where the verification body is required by law or by a court or regulator to disclose confidential information, it shall notify the subject in advance unless prohibited from doing so.
- 10.4.3** The verification body shall inform the subject, before the engagement agreement is signed, of the disclosure levels available and of what each entails.

10.5 Information to the subject

- 10.5.1** The verification body shall provide the subject, throughout the engagement, with access to the status of every verified fact, finding and corrective action, the evidence relied on, the dates of observation, the next re-verification date, every notice of error concerning its record, and every correction, in a form the subject can retain.

10.6 Document control of this standard

- 10.6.1** This standard and the Program shall carry an edition year and a version number. The edition year shall change only when requirements change in substance. Versions within an edition shall be numbered sequentially and dated, and a changelog shall state every change with its effective date. Superseded versions shall remain published.

11 Management system requirements

11.1 General

- 11.1.1 The verification body shall establish, document, implement and maintain a management system capable of supporting and demonstrating the consistent fulfillment of this standard. The management system shall address at least the matters in 11.2 to 11.7.
- 11.1.2 Top management shall review the management system at planned intervals, at least annually, to ensure its continuing suitability, adequacy and effectiveness, and shall record the review.

11.2 Documentation

- 11.2.1 The verification body shall document its policies and objectives for impartiality, competence, evidence, and openness; the organizational structure under 6.1; the Program; the procedures required by Clause 9; and the roles under 7.2. Documentation shall be available to all personnel.

11.3 Control of documents and records

- 11.3.1 The verification body shall control the documents of the management system so that current versions are identified, approved before issue, available where needed, and superseded versions are withdrawn from use but retained.
- 11.3.2 The verification body shall control the records required by 9.20 so that they are identifiable, legible, retrievable, protected from alteration and loss, and retained for the periods in Annex E.

11.4 Management review

- 11.4.1 Management review shall consider the results of internal audits, the impartiality review, notices of error, appeals and complaints, corrections and withdrawals, the performance of corrective actions, the competence of personnel, changes in the systems in scope and in the legal environment, and resources, and shall decide on improvements and record them.

11.5 Internal audit

- 11.5.1 The verification body shall carry out internal audits of its conformity with this standard at least annually, covering every clause and every role, performed by a person independent of the activity audited or, where no such person is available, by top management with that fact recorded, and shall record the findings and the actions taken.
- 11.5.2 A sample of records issued in the period shall be re-examined in each internal audit against Annexes A to D, and every entry that was corrected or withdrawn in the period shall be included in the sample.

11.6 Nonconformities and corrective actions

- 11.6.1 Where a nonconformity with this standard is identified, from any source, the verification body shall record it, determine its cause, determine whether any published verified fact or finding is

affected and if so handle it under 9.14, take action to eliminate the cause, and verify the effectiveness of the action.

11.7 Risks and opportunities

- 11.7.1** The verification body shall identify, at least annually, the risks to the achievement of this standard's objectives, including risks from changes in AI systems, in the availability of evidence, in the legal environment, and in its own resources, and shall plan and record actions to address them.

Annex A (normative): Evidence tiers and acceptance criteria by fact type

A.1 Evidence tiers

A.1.1 Tier 1, audited

Audited financial statements issued with the report of an auditor licensed or registered with the relevant professional or regulatory body; audited key performance indicators; and attestation or agreed-upon-procedures reports issued by such a practitioner on a specified figure.

A.1.2 Tier 2, filed

Records held by a government body, court, regulator, registry or office with statutory authority, including corporate registers, securities filings, court dockets, regulator registers and notices, patent and trademark registers, licensing registers, sanctions lists and insolvency registers.

A.1.3 Tier 3, primary

Contemporaneous original documents issued by a party other than the subject's marketing function, including executed contracts, certificates issued by a certification body and confirmed with that body, confirmations obtained by the verifier directly from a counterparty, bank confirmations, regulatory approvals, board minutes certified by the corporate secretary, and original publications dated at the time of the event.

A.1.4 Tier 4, asserted

Statements by the subject or its representatives, including its website, marketing material, press releases, management accounts, internal reports, and representations made to the verifier. Tier 4 evidence is not accepted, and a claim supported only by tier 4 evidence is not included in a record.

A.2 Acceptance criteria

A.2.1 Tier 1

The verifier shall obtain the complete statements with the auditor's report; shall confirm the auditor's registration or license with the relevant body and record it; shall record the period, framework, currency, consolidation basis and opinion type; shall trace the figure to the statements; and shall record any qualification, emphasis of matter, going-concern reference or restatement in the record. Statements bearing an adverse opinion or a disclaimer of opinion are not tier 1 for the figures affected. A figure whose period ended more than the period in Annex E before the date of verification shall be published with the period stated and the words "for the period ended".

A.2.2 Tier 2

The verifier shall obtain the record from the register directly wherever the register is accessible, shall identify the register, the entry identifier and the retrieval date, and shall preserve the retrieved record. Where the register is not accessible online, a certified copy or extract obtained through a registered agent under 7.6 is acceptable. A copy supplied by the subject is acceptable only where the register is inaccessible and the copy bears the register's certification, and the record shall say so.

A.2.3 Tier 3

The document shall be an original or a certified copy, shall be contemporaneous with the fact it evidences, and shall identify its issuer. A confirmation from a counterparty, certification body, awarding body or bank shall be obtained by the verifier directly from that party, and the request and response shall be preserved.

A.2.4 Tier 4

A representation received from the subject shall be recorded in the engagement file with its date, the name and role of the person making it, and the form in which it was made, and the subject shall be told what evidence would be required for the claim to be included.

A.2.5 Where evidence of more than one tier is available for the same fact, the verifier shall rely on the highest tier and may record the others as corroboration. Where evidence of different tiers conflicts, the higher tier shall govern and the conflict shall be recorded.

A.3 Documented search

A.3.1 A documented search establishing the absence of a matter shall cover, for each jurisdiction of formation, principal place of business and principal operations, and each jurisdiction named in the claim: the corporate register; the courts of general jurisdiction and any specialist court relevant to the matter; the registers and enforcement notices of each regulator with authority over the subject's activities; insolvency and bankruptcy registers; national and international sanctions lists; and, where the claim concerns intellectual property, the patent and trademark registers.

A.3.2 The search shall be run against the subject's legal name, former names, registered trade names, and every name variant, transliteration and common misspelling identified in the verification plan, and against the names of similarly named entities identified under 9.6.4, so that misattribution can be excluded.

A.3.3 The record of the search shall state every source searched, the terms used, the period covered, the date of each search, and the result of each search including nil results, and shall preserve exports or captures of the results. A documented search is valid for the period in Annex E and shall be repeated on re-verification.

A.3.4 A documented search supports a finding of unsupported where no evidence of the matter is found, and supports a finding of false only where the matter claimed is of a kind that would necessarily appear in the sources searched.

A.4 Evidence disclosure levels

A.4.1 Public

The record links to the evidence itself, or to the register entry, and any person can inspect it. Tier 2 evidence shall be published at this level unless the register's terms prevent it.

A.4.2 Described

The record states the type of evidence, its issuer, its date or period, its identifying details (for tier 1, the auditor, the period and the opinion type; for tier 3, the issuer and the date), and the tier, and states that the document is held by the verification body and will be made available, with the subject's consent or

where the law requires, to a provider, a court or a regulator under a confidentiality undertaking. Tier 1 evidence for a subject whose statements are not public shall be published at this level unless the subject elects public disclosure.

A.4.3 Restricted

The record states the tier and that disclosure is restricted by law, and states the law. This level shall be used only where disclosure at the described level is itself prohibited.

A.5 Jurisdictional alternatives

A.5.1 Where a jurisdiction does not require audited statements for the subject, tier 1 evidence is unavailable and financial facts shall not be included in the record unless the subject commissions an audit or an attestation under A.1.1.

A.5.2 Where a register is not public, a certified extract obtained by a registered agent under 7.6 is tier 2. Where no register exists for the fact type, the fact shall be included only where tier 3 evidence meets A.2.3; otherwise it shall not be included.

A.5.3 Documents not in English shall be handled under 9.5.7, and the record shall state the language of the original.

A.6 Fact types and required evidence

Table A.1: Fact types and required evidence

Fact type	Tier	Acceptable evidence	Source-obtained	If unavailable
Legal name, entity type, jurisdiction, formation date	2	Corporate register entry; formation documents on file	Required	Not included
Registered address; principal place of business	2	Register entry; annual or regulatory filing stating principal office	Required	Tier 3 lease plus utility; else not included
Good standing or active status	2	Certificate or register status no older than the period in Annex E	Required	Not included
Ownership, parent, subsidiaries	2	Securities filings; annual returns; beneficial ownership register where public	Required	Tier 3 certified share register; else not included
Directors and officers	2	Register filings; securities filings	Required	Tier 3 certified board minutes; else not included
Revenue, profit, assets, equity, cash	1	Audited financial statements with auditor's report	From auditor or public filing where possible	Not included; management accounts are tier 4
Capital raised	2	Securities filings; register entries for share issues	Required	Tier 3 executed subscription documents plus bank confirmation; else not included
Valuation	1 or 2	Audited statements or securities filing stating it	Required	Not included

Fact type	Tier	Acceptable evidence	Source-obtained	If unavailable
Customer, user or subscriber counts	1	Audited KPI; attestation or agreed-upon-procedures report; regulatory filing stating the count	From practitioner	Not included
Employee count	1 or 2	Audited or attested figure; statutory filing stating headcount	Required	Not included
Years in operation; operating history	2	Formation record; earlier predecessor entities on register	Required	Tier 3 dated contracts or publications for pre-formation activity
Licenses and registrations	2	Regulator register or license record	Required	Not included
Certifications (management systems, security, quality)	3	Certificate confirmed with the certification body; auditor's report for attestation reports	Confirmation obtained by verifier	Not included
Patents and trademarks	2	Patent office or trademark office register	Required	Not included
Litigation, regulatory or enforcement action, sanctions, insolvency	2	Court dockets; regulator notices; sanctions lists; insolvency register	Required	Documented search under A.3 for absence
Resolution of a matter	2	Docket entry, order, regulator notice or register entry showing resolution and date	Required	Tier 3 confirmation from the opposing party or regulator obtained by verifier; else the matter is published as open
Products and services offered	3	Executed contracts; regulatory approvals; product documentation dated and issued to customers	Where applicable	Not included
Markets and countries served	2 or 3	Local registrations; executed contracts or invoices by country	Where applicable	Not included
Partnerships, memberships, awards	3	Confirmation obtained by the verifier from the counterparty, body or awarding organization	Required	Not included
Security incidents and breaches	2	Regulatory breach notifications; court records	Required	Documented search for absence
Executive roles and tenure	2	Register or securities filings	Required	Tier 3 certified minutes; else not included
Distinction from a similarly named entity	2	Register identifiers of both entities	Required	Finding of misattributed not available; finding limited to unsupported

Annex B (normative): Testing protocol for AI representations

B.1 General

- B.1.1** An observation is the response of a system in scope to one question under one condition set. Observations are collected under this annex, preserved under 9.20 before analysis, and relied on for findings only where they meet B.4 and B.5 and the minimum counts in Annex E.
- B.1.2** The protocol is specified so that a third party with the reproducibility package in B.7 can repeat an observation under the same condition set. Variation in the response is expected; the protocol controls the conditions, not the answer.

B.2 Question families

- B.2.1** Every engagement shall include questions from each of the following families, phrased as a person making the corresponding decision would phrase them, together with any subject-specific questions in the verification plan:
- a) Identity: what the subject is, what it does, where it is, who owns it.
 - b) Trust: whether the subject is legitimate, reliable, safe to do business with, or financially sound.
 - c) Problems: whether the subject has complaints, lawsuits, regulatory action, security incidents, or controversies.
 - d) Capability: whether the subject offers a named product or service, serves a named market, or holds a named license or certification.
 - e) Comparison: how the subject compares with named competitors, and which is better for a stated need.
 - f) Recommendation: which organizations a person with stated requirements should consider, where the subject meets those requirements.
 - g) People: who leads the subject and in what roles.
 - h) Scale: the subject's size, revenue, customers and employees.
 - i) History: when the subject was founded, what it has done, and what has happened to it.
 - j) Disambiguation: whether the subject is the same as, related to, or different from a similarly named organization.
- B.2.2** Each question shall be prepared in at least the number of wordings stated in Annex E, including at least one neutral wording, one wording that presupposes a problem, and one wording that presupposes a strength, so that the influence of the question's framing on the answer is observed.

B.3 Condition sets

- B.3.1** A condition set specifies: the wording; the persona, if any, stated to the system; the location from which the question is asked and the method by which that location is established; the

date and time; the system and, where selectable, the model version; the browsing, search or grounding state, where controllable; the language; and the account state under B.4.

- B.3.2** For each question family, observations shall be made under condition sets that vary at least wording, date and location, and, where the system permits, browsing state and model version, so that each finding rests on observations that differ in at least the dimensions stated in Annex E.
- B.3.3** Locations shall include the subject's jurisdiction of principal operations and each principal market in scope. Languages shall include English and the principal language of each principal market in scope.

B.4 Environment and account hygiene

- B.4.1** Each observation shall be made in a fresh session with no prior turns, in an account or anonymous state with memory, personalization and history disabled or absent, with no custom instructions or system prompt, and with the system's default settings except those the condition set varies.
- B.4.2** Accounts used for observation shall be registered to the verification body, shall not be associated with the subject, and shall carry no history, memory, custom instructions or personalization that could influence the response. The same account shall not be reused for the same subject within the period in Annex E.
- B.4.3** The method of establishing location shall be recorded and shall be one the provider's system treats as the user's location. Observations made through an API shall be recorded as such and shall not be treated as equivalent to observations made through the consumer interface unless the engagement states that the API is the interface in scope.
- B.4.4** Observations shall be obtained in compliance with the terms of service of each system in scope. Where those terms restrict automated access, observations shall be made manually or through an interface the provider authorizes for the purpose, and the method shall be recorded. An observation obtained in breach of a provider's terms shall not be relied on for a finding.

B.5 Capture requirements

- B.5.1** Each observation shall be captured as it appeared and shall record: the question verbatim; the complete response, including every citation, link, source label and disclaimer presented; a screen capture of the response as displayed; the system, the model and version as displayed or determinable; the timestamp in ISO 8601 with offset; the location and the method of establishing it; the browsing or grounding state and any indication the system gave of searching; the language; the account state; the persona, if any; the capture tool and its version; and a cryptographic hash of the capture.
- B.5.2** Where a response is streamed or changes after first display, the final state shall be captured and the change noted. Where a response includes an explanation by the system of its own answer, it shall be captured and marked as not evidence of cause under 9.6.5.

B.6 Detection of major releases

- B.6.1** The verification body shall monitor provider announcements for every system in scope and shall record each announced model version, default change or retrieval change as a major release with its date.
- B.6.2** The verification body shall maintain a fixed set of control questions for each system in scope, unrelated to any subject, and shall run them at the interval in Annex E. A change in the distribution of responses to the control set beyond the threshold in Annex E shall be treated as a major release from the date detected, whether or not announced.

B.7 Reproducibility package

- B.7.1** For every finding, the verification body shall preserve, and where the subject elects shall publish with the finding, a reproducibility package containing: each question verbatim; each condition set; the systems, models and versions; the dates and times; the environment and account hygiene applied; the capture tool and version; the procedure followed; and the hashes of the captures. Account identifiers and location credentials shall be withheld from publication and may be made available to a provider under confidentiality with the subject's consent.

B.8 Validation of collection software

- B.8.1** Software used to collect observations shall, before first use and after every change to the software or to the interface of a system in scope, be run against a validation set of questions alongside manual observation under the same condition sets, and the agreement between the two shall be recorded. Where captures differ in content, citations, version labeling or metadata, the cause shall be determined and corrected before the software is used for findings.

B.9 Minimum observations

- B.9.1** A finding shall rest on at least the number of observations, condition sets and distinct dates stated in Annex E for its category, in each system in which the claim was observed. A determination that a representation is model-driven under 9.6.3 shall rest on observations with browsing disabled where controllable, or across at least the number of wordings and dates stated in Annex E where it is not.
- B.9.2** A finding of omitted under Annex C shall rest on observations of the recommendation family under condition sets whose stated requirements the subject meets on verified facts, and shall state the proportion of observations in which the subject was absent.

B.10 Controls

- B.10.1** Each engagement shall include, for each system in scope, at least one question whose answer is a verified fact in the record, so that the system's baseline knowledge of the subject is observed, and the result shall be recorded in the record as context for the findings.

Annex C (normative): Finding categories and decision rules

C.1 Categories

C.1.1 False

The claim is contradicted by tier 1 or tier 2 evidence, or asserts a matter that a documented search under A.3 shows does not exist where the matter is of a kind that would necessarily appear in the sources searched. Required: the contradicting evidence or the documented search.

C.1.2 Unsupported

No evidence of the claim was found after a documented search, and the claim is not of a kind that a documented search can exclude. A finding of unsupported states that it is not a finding of falsity. Required: the documented search.

C.1.3 Misleading

The claim consists of true elements presented so as to produce a conclusion that the evidence does not support, including a resolved matter presented as current, a dated figure presented as current, facts of a related or similarly named organization combined with the subject's, or a true fact presented with an unsupported inference. Required: evidence for each true element at its required tier, and identification of the unsupported conclusion.

C.1.4 Misattributed

The claim concerns a different organization, established by comparison of tier 2 identifiers of the subject and of the organization to which the claim relates. Required: tier 2 identifiers for both and, where the other organization is named, review under 5.5.3.

C.1.5 Omitted

In the recommendation family, the subject meets the requirements stated in the question on verified facts and is absent from the organizations named in at least the proportion of observations stated in Annex E. Required: verified facts meeting each stated requirement and observations meeting B.9.2.

C.1.6 Confirmed

The claim is supported by evidence of the tier that a finding of false on the same claim would require, and the matter is current. A confirmed claim is reported to the subject in writing with the evidence. Where the claim is unfavorable to the subject, no entry is issued and nothing is published; the subject may request a finding of resolved under C.1.7 once the matter is resolved with evidence. Where the claim is favorable, the subject may elect to have it issued as a verified fact. Required: the supporting evidence.

C.1.7 Resolved

The claim was accurate at a past date and the matter has since been resolved, with tier 2 evidence or tier 3 confirmation of the resolution and its date. Required: the evidence of the original matter and of its resolution.

C.1.8 Recurred

A claim on which a finding of false, unsupported, misleading, misattributed or omitted was issued, which was the subject of a completed corrective action and verified as changed under 9.12.4, has been observed again under B.9. Required: the prior finding, the corrective action, the verification of effect, and the new observations.

C.2 Misattribution analysis

- C.2.1** Where a claim could concern an organization other than the subject, the verifier shall identify every candidate organization with a similar name, a shared trade name, a shared former name, a shared person in a leadership role, or a shared domain or address, shall obtain the tier 2 identifiers of each, and shall record which organization the evidence shows the claim concerns.
- C.2.2** Where the evidence does not establish which organization the claim concerns, the finding shall be unsupported, and the record shall state that misattribution could not be excluded.

C.3 Decision rules

- C.3.1** The lead verifier shall apply the following rules in order and shall record the rule at which the category was determined:
- a) If the claim concerns a different organization under C.2, the finding is misattributed; otherwise continue.
 - b) If the claim is supported at the required tier and the matter is current, the claim is confirmed under C.1.6; if supported and resolved with evidence of resolution, the finding is resolved; otherwise continue.
 - c) If the claim is contradicted by tier 1 or tier 2 evidence, or excluded by a documented search of a kind that would necessarily show the matter, the finding is false; otherwise continue.
 - d) If the claim consists of true elements at their required tiers and an unsupported conclusion, the finding is misleading; otherwise continue.
 - e) If no evidence was found after a documented search, the finding is unsupported.
- C.3.2** A finding of omitted is determined separately under C.1.5 and does not pass through C.3.1.
- C.3.3** A finding of recurred is determined under C.1.8 on re-verification and is recorded against the prior finding.

C.4 Precedence

- C.4.1** Where the rules in C.3.1 are applied in order, the first rule satisfied determines the category. Where a lead verifier considers that a later rule better describes the claim, the finding shall nevertheless take the category of the first rule satisfied, and the reasoning for the alternative view shall be recorded and may be stated in the finding's basis.

C.5 Form of a finding

- C.5.1** A finding shall be expressed in the following form, in this order: the claim, quoted or closely paraphrased from the observations; the category; the finding in one sentence; the basis,

naming the evidence and its tier or the documented search; the systems, condition sets and dates of observation; and the determination under 9.6.3.

- C.5.2** A finding shall not characterize the subject, the provider or any third party beyond the finding itself, shall not speculate on motive, and shall not describe the claim as a lie, an attack, or a defamation.

C.6 Interpretation of findings

- C.6.1** A finding states what the evidence shows about the claim, and nothing else. A confirmed claim reported under C.1.6 states that the claim is supported by evidence; it does not characterize the claim as fair or material. A finding of false states that the claim is contradicted by evidence; it does not state why the system produced it. A finding of omitted states that the subject was absent from the observations; it does not state that the subject ought to have been recommended.

Annex D (normative): Record content and structured data

D.1 Structure of a record

- D.1.1** A record consists of: a record page at a stable address; one finding page per published finding, at a stable address under the record page; the verified facts, on the record page; the current verification statement, delivered to the subject; and the structured data in D.4. The address of a record is assigned by the verification body, is not derived from the subject's name where the subject has elected the addressed level, and does not change on re-verification or correction.

D.2 Record page content

- D.2.1** A published record page shall state: the subject's legal name and jurisdiction; its register identifiers; the record identifier; the record status (current, suspended); the version of this standard and of the Program applied; the systems in scope; the date of first issue, the date of last re-verification and the next re-verification date; the disclosures required by 5.3.8; whether the mark is currently authorized; a link to the standard and to the lookup; the scope notice: "This record contains the entries the subject has elected to publish. It is not a comprehensive assessment of the subject, and nothing is to be inferred from the absence of any matter."; and the reliance notice required by 5.4.3, in the form approved by the verification body's counsel, stating that the record is issued to the subject and that the verification body accepts no liability to any other person.
- D.2.2** The record page shall list every published verified fact with the metadata in D.3, grouped by fact type in the order of Table A.6, and shall list every published finding with its title, category, status and link. The lead verifier and independent reviewer may be identified on the published record by name or by authorization number; they shall be named in the verification statement delivered to the subject.

D.3 Entry metadata

- D.3.1** Every verified fact and finding shall carry: an entry identifier that does not change; its type (verified fact, finding); its statement, in one sentence; for a finding, its category under Annex C and the claim as observed; its evidence, listing for each item the type, issuer, date or period, tier and disclosure level, with a link where the level is public; any documented search by reference; for a finding, the number of observations, the systems and the date range, the determination under 9.6.3, and a link to the reproducibility package where the subject has elected its disclosure; any corrective action with its type, date, party addressed, response and verified effect (changed, partly changed, not changed); the versions of the standard and Program; the date of issue, the date last re-verified and the next re-verification date; the entry status (current, superseded, corrected, resolved, recurred, withdrawn); and the entry's disclosure level.

D.4 Structured data

- D.4.1** The record page shall carry a JSON-LD block describing the subject as a schema.org Organization, with legalName, identifier for each register identifier, address, foundingDate

where verified, url, and sameAs for register entries, and shall attach to each verified fact the extension properties in D.5 through a mod:VerifiedFact node referencing the Organization.

- D.4.2** Each finding page shall carry a JSON-LD block describing the finding as a schema.org ClaimReview, with: claimReviewed, the claim as observed; itemReviewed, a Claim whose appearance is each observation, described as a CreativeWork with its dateCreated and an author of type Organization naming the system and its provider; author, the verification body as Organization; datePublished; dateModified; url; and reviewRating, a Rating with alternateName equal to the category and ratingValue under D.6. A finding of omitted shall be published as a mod:OmissionFinding rather than a ClaimReview, because it reviews an absence rather than a claim.
- D.4.3** One ClaimReview per finding page, and no more, so that each finding is eligible for retrieval as a fact check in systems that apply that rule.
- D.4.4** Every JSON-LD block shall validate against the published schema at the address in D.7 before publication, and the validation shall be recorded.

D.5 Extension vocabulary

- D.5.1** The extension vocabulary uses the prefix mod with the namespace <https://modulus.ai/ns/mod1401#>. Its properties are: mod:evidenceTier (1, 2, 3 or 4); mod:evidenceDisclosureLevel (public, described, restricted); mod:documentedSearch (reference); mod:determination (source-driven, model-driven, gap-driven); mod:observationCount; mod:systemsObserved; mod:reproducibilityPackage (reference); mod:correctiveAction (type, date, party, response); mod:effectVerified (changed, partly-changed, not-changed, not-tested); mod:recordDisclosureLevel (addressed, public); mod:scopeNotice (text); mod:leadVerifier (name or authorization number, optional); mod:independentReviewer (name or authorization number, optional); mod:standardVersion; mod:programVersion; mod:issueDate; mod:lastReverified; mod:reverificationDate; mod:entryStatus; mod:recordStatus (current, suspended); mod:markAuthorized (boolean). Their types are mod:VerifiedFact and mod:OmissionFinding.

D.6 Rating mapping

Table D.1: Mapping of finding categories to reviewRating

Category	reviewRating.alternateName	reviewRating.ratingValue (1 to 5)
False	False	1
Misattributed	Misattributed	1
Misleading	Misleading	2
Unsupported	Unsupported	3
Resolved	Resolved	4
Recurred	Recurred (prior category)	value of the prior category

D.7 Well-known index

D.7.1 The verification body shall publish, at the address `/.well-known/mod1401.json` on its domain, a JSON document stating: the address of the current standard and of each prior version; the current Program version and effective date; the address of the Program's governance page; the address of the lookup under 10.1.3; the contact point for notices of error; the address of the JSON schema for D.4 and D.5 and of the JSON-LD context; and the default systems in scope. The index shall not list records. The same addresses shall be stated in the verification body's `llms.txt`.

D.8 Example

Example of a finding published as JSON-LD

```
{
  "@context": ["https://schema.org", {"mod": "https://modulus.ai/ns/mod1401#"}],
  "@type": "ClaimReview",
  "url": "https://modulus.ai/r/MOD-R-7K2PQ9XA/findings/billing-complaints",
  "datePublished": "2026-11-04",
  "dateModified": "2026-11-04",
  "claimReviewed": "Example Co has faced complaints about billing practices.",
  "author": {"@type": "Organization", "name": "Modulus AI, Inc.", "url": "https://modulus.ai"},
  "itemReviewed": {
    "@type": "Claim",
    "appearance": [{
      "@type": "CreativeWork",
      "dateCreated": "2026-10-29T14:02:11-07:00",
      "author": {"@type": "Organization", "name": "ChatGPT ([model version as displayed]), OpenAI"}
    }]
  },
  "reviewRating": {"@type": "Rating", "ratingValue": 1, "bestRating": 5, "worstRating": 1, "alternateName": "Misattributed"},
  "mod:evidenceTier": 2,
  "mod:evidenceDisclosureLevel": "public",
  "mod:determination": "source-driven",
  "mod:observationCount": 12,
  "mod:systemsObserved": ["ChatGPT", "Perplexity"],
  "mod:standardVersion": "MOD 1401:2026 v1.0",
  "mod:programVersion": "2026.1",
  "mod:recordDisclosureLevel": "addressed",
  "mod:issueDate": "2026-11-04",
  "mod:reverificationDate": "2027-02-02",
  "mod:entryStatus": "current"
}
```

Annex E (normative): Periods, intervals and retention

E.1 The values in this annex govern wherever the body of the standard refers to a period, interval, count or threshold "in Annex E". Business days are counted in Arizona, United States. A change to any value is a Program change under 8.9.

Table E.1: Governing periods, intervals, counts and thresholds

Parameter	Clause	Value
Subject approval and election period	9.8.1, 9.8.4	20 business days
Effect given to a change of disclosure level or a withdrawal requested by the subject	9.8.5, 9.19.5	3 business days
Publication after the verification statement is signed	9.11.1	3 business days
Re-verification interval	9.13.1	90 days
Re-verification after a major release of a system in scope	9.13.1	30 days
Initial verification of effect after a corrective action completes	9.12.4, 9.13.1	14 days, then at the next re-verification
Evaluation of facts discovered after issue	9.14.1	10 business days
Notice of error acknowledgment	9.15.2	5 business days
Appeal filing after notice	9.16.1	15 business days
Appeal decision	9.16.2	30 business days
Complaint acknowledgment	9.17.1	5 business days
Complaint response	9.17.1	30 business days
Correction or withdrawal after determination	9.18.1	5 business days
Suspension for non-payment	9.19.1	15 days after written notice of non-payment
Withdrawal for non-payment	9.19.1	30 days after suspension
Lookup reports a withdrawn record as withdrawn	9.19.2	90 days after withdrawal
Retention of records and evidence after withdrawal	9.20.3	3 years
Maximum age of good standing evidence at verification	9.5.4, A.6	90 days
Audited figure flagged "for the period ended"	A.2.1	period ended more than 18 months before verification
Validity of a documented search	A.3.3	90 days
Minimum wordings per question	B.2.2	3
Minimum interval before reuse of an observation account for the same subject	B.4.2	30 days
Control set interval	B.6.2	14 days
Control set threshold treated as a major release	B.6.2	categorized response changed for 20 percent or more of control questions
Minimum observations per finding of false, misleading, misattributed or resolved, and per confirmed claim, per system in which the claim was observed	B.9.1	5 observations, across at least 3 condition sets differing in wording and date, on at least 2 distinct dates

Parameter	Clause	Value
Minimum observations per finding of unsupported	B.9.1	as above, plus the documented search
Minimum observations for a model-driven determination where browsing cannot be disabled	B.9.1	3 wordings on at least 2 dates with the claim persisting in each
Minimum observations per finding of recurred	B.9.1	3 post-correction observations on at least 2 dates
Minimum observations per finding of omitted, per system	B.9.2	10 observations of recommendation-family questions
Omission threshold	C.1.5	subject absent in 70 percent or more of qualifying observations
Cooling-off before assignment of former subject personnel	5.3.6	2 years
Prohibition on marketing and related services after withdrawal	5.3.3	12 months
Impartiality review	6.3.1	at least annually
Competence re-evaluation	7.4.4	at least every 2 years
Expiry of transitional authorization of verifiers	7.3.6	on completion of the fifth engagement
Review of default systems in scope	8.2.1	at least quarterly
Internal audit	11.5.1	at least annually
Management review	11.1.2	at least annually

Annex F (normative): Verification statement

F.1 Every issue, re-issue, correction or withdrawal of a record shall be made by a verification statement in the following form, signed by the lead verifier and countersigned by the independent reviewer, dated, and delivered to the subject.

F.2 Form of the statement

Verification statement under MOD 1401:2026

Record: [record identifier; address, if published]

Subject: [legal name], [jurisdiction], [register identifier]

Statement number: [sequential number for this record]. Supersedes statement number: [number or "none"]

Action: [first issue / re-verification / correction / withdrawal]

Standard version: MOD 1401:2026 version [n]. Program version: [n]

Systems in scope: [list, with model versions where determinable]

Period of observation: [first date] to [last date]

Entries issued by this statement: [list of entry identifiers, each with its type, for findings its category, and the disclosure level elected by the subject]

Entries superseded by this statement: [list or "none"]

Subject approval and election: recorded on [date]; record disclosure level: [private / addressed / public]; confirmed adverse claims reported to the subject under C.1.6: [number]

Independent review: completed on [date]

Legal review under 5.5: [completed on date / not required]

Disclosures under 5.3.8: [text or "none"]

Next re-verification date: [date]

I confirm that each entry issued by this statement was made by me on evidence that I examined, that the evidence meets the tier required by Annex A, that the observations meet Annex B and Annex E, that the finding categories were assigned under Annex C, and that the subject's approval and election under 9.8 were recorded. I confirm that I have no conflict of interest with respect to the subject that has not been declared and recorded.

Lead verifier: [name], [signature], [date]

I confirm that I reviewed each entry issued by this statement under 9.9, that I was not involved in making it, and that my review is recorded.

Independent reviewer: [name], [signature], [date]

This record is issued to the subject for its use. It contains the entries the subject has elected to publish and is not a comprehensive assessment of the subject. It is not an audit opinion, a certification of the subject, legal advice, or an endorsement of the subject, its products or its conduct. The verification body is responsible for the content of the entries issued by this statement and accepts no liability to any person other than the subject.

- F.3** A statement that withdraws a record shall state the date of withdrawal and the reason (expiry, termination by the subject, non-payment, termination by the verification body under 9.19.4, or the subject's request), and shall list every entry affected.

Annex G (normative): Use of the Modulus Verified mark

G.1 The mark

The mark is the Modulus Verified mark: the words "Modulus Verified", the standard identifier "MOD 1401", and the address of the subject's record, in the form published by the verification body. Modulus Verified and MOD 1401 are marks of Modulus AI, Inc.

G.2 Authorization

A subject is authorized to display the mark only while its record is current. Authorization ends automatically on suspension or withdrawal under 9.19, and a published record page states whether the mark is authorized.

G.3 Permitted use

The subject may display the mark on its website, in its documents and in its communications, provided that: where the record is published, the mark links to or states the record address; the mark is not altered; the mark is not placed so as to suggest that a specific product, claim, person or statement has been verified unless that matter is a verified fact in the record; and the mark is accompanied, where space permits, by the words "Independent verification under MOD 1401:2026. The record is not an audit, certification or endorsement."

G.4 Prohibited use

The subject shall not: use the mark after authorization ends or while the record is suspended; use the mark in connection with an organization, product or affiliate not covered by the record; describe the record as an audit, audit opinion, accreditation, certification or endorsement; describe an unpublished, suspended or withdrawn entry as verified; quote a finding selectively so as to change its meaning; omit from a quotation of a finding its category or its basis; use the mark in litigation, regulatory or advertising claims in a way that implies the verification body's support for the subject's position; or use the verification body's name in any marketing material except in the form in G.3.

G.5 Reference by the verification body

The verification body shall not describe a subject as endorsed, approved or recommended, shall refer to a subject as verified under this standard only where the subject has elected the public disclosure level, and shall otherwise not disclose that the subject is or was verified.

G.6 Enforcement

The verification body shall monitor use of the mark, shall require correction of any misuse within 10 business days of notice, shall note persistent misuse on the record, and shall terminate the engagement and withdraw the record under 9.19.4 where misuse continues after notice.

Annex H (informative): Correspondence with ISO/IEC 17029:2019

H.1 This annex shows where the principles and requirements of ISO/IEC 17029:2019 are reflected in this standard and where this standard adds requirements that have no counterpart. The correspondence is informative; the Foreword states the relationship between this standard and ISO/IEC 17029, and the ISO text governs its own content.

Table H.1: Correspondence with ISO/IEC 17029:2019

ISO/IEC 17029:2019	MOD 1401:2026	Adaptation
Clause 4, Principles (impartiality, competence, consistent operation, confidentiality, openness, responsibility, responsiveness, risk-based approach)	Clause 4	Adds 4.4 human-led verification, 4.5 evidence-based approach as a stand-alone principle, 4.7 openness of method, and 4.12 separation of roles
5.1 Legal entity	5.1	Adds publication of top management identity
5.2 Responsibility for the validation/verification statement	5.2	Extends responsibility to every published entry and to traceability to named persons
5.3 Management of impartiality	5.3	Adds the prohibition on marketing and related services to subjects, fee independence from outcome, the prohibition on verifying providers of systems in scope, and disclosure of provider relationships
5.4 Liability	5.4	Adds financing of evidence preservation and liability wording in engagement agreements
No counterpart	5.5	Legal review of entries naming third parties
6.1 Organizational structure and top management	6.1	Adds the Program manager and evidence custodian roles and the separation of lead verifier and independent reviewer
6.2 Operational control	6.2	Equivalent
Mechanism for safeguarding impartiality (within 5.3)	6.3	Annual review by top management, recorded
7.1 General; 7.2 Personnel; competence management; outsourcing	7.1 to 7.4, 7.6	Competence criteria specified for audited records, filed records, the testing protocol and AI system behavior
No counterpart	7.5	Permitted and prohibited uses of software and AI systems by personnel
Clause 8, Validation/verification program	Clause 8	The Program is defined by this standard and published in full; change control in 8.9
9.1 General; 9.2 Pre-engagement; 9.3 Engagement; 9.4 Planning	9.1 to 9.4	Adds requester engagements, decline conditions, confidentiality of pre-engagement assessments, and the subject's obligations and elections
9.5 Validation/verification (execution)	9.5 to 9.7	Split into fact verification, representation investigation and findings; specifies audited-record procedures and cause determination
No counterpart	9.8	Subject approval and election of disclosure; the subject decides whether an entry is published, never what it says
9.6 Review	9.9	Independent review by a person not involved; unresolved disagreement blocks publication

ISO/IEC 17029:2019	MOD 1401:2026	Adaptation
9.7 Decision and issue of the validation/verification statement	9.10, 9.11, Annex F	Adds three disclosure levels, per-finding pages, structured data and crawlability
No counterpart	9.12	Corrective action with a pre-defined test and separation of intervention from evaluation
No counterpart	9.13	Re-verification on intervals and on major releases
9.8 Facts discovered after issue	9.14	Equivalent, with a suspension rule for imminent harm
9.10 Handling of complaints (in part)	9.15	Notices of error from any person, evaluated and recorded
9.9 Handling of appeals	9.16	Equivalent
9.10 Handling of complaints	9.17	Equivalent
No counterpart	9.18	Correction or withdrawal of entries found wrong
No counterpart	9.19	Suspension for non-payment, withdrawal on termination
9.11 Records	9.20	Adds hashing, chain of custody and retention after withdrawal
10.1 Publicly available information; 10.2 Other information	10.1, 10.5	Adds the lookup; prohibits a register of subjects
No counterpart	10.2, Annex D	Machine-readable publication and the well-known index
10.3 Reference to validation/verification and use of marks	10.3, Annex G	Equivalent, with authorization tied to a current record
10.4 Confidentiality	10.4	Extended to the existence of the engagement and the identity of the subject
Clause 11, Management system requirements	Clause 11	Single option: own management system meeting 11.2 to 11.7
No counterpart	Annexes A, B, C, E	Evidence tiers, testing protocol, finding categories, and governing values

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