

# Responsible Influencer Marketing in Online Gambling

## About EGBA

The European Gaming and Betting Association (EGBA) is the Brussels-based trade association representing the leading online gambling operators established, licensed, and regulated within the EU. EGBA collaborates with national and EU authorities and other stakeholders to foster a well-regulated online gambling market that ensures high consumer protection standards while acknowledging the realities of the internet and evolving consumer preferences. As part of its commitment to safer gambling, EGBA organises and coordinates the annual European Safer Gambling Week, bringing together industry stakeholders to promote safe and sustainable play.

EGBA members adhere to the highest regulatory standards, collectively holding 321 online gambling licences – each licence with its own rigorous compliance requirements – and serving over 30 million customers across 21 European countries. Together, they represent approximately 30% of Europe's 2024 online gambling gross gaming revenue.

[www.egba.eu](http://www.egba.eu)

# Introduction

The rapid growth and uptake of digital marketing trends across the advertising industry have meant that marketers had to quickly adapt their practices. A key trend over the past decade has been the increased use of influencer marketing across the industry – and the gaming and betting sector has been no different. The European Gaming and Betting Association (EGBA) represents leading online gambling operators, who are licensed and regulated within the EU.

Regardless of individual marketing strategies, EGBA members are committed to advertising in a way that is responsible and truthful. EGBA has already achieved important progress in guiding its members' marketing practices with the first pan-European [Code of Conduct on responsible online gambling advertising](#), developed back in 2020. The Code is media channel neutral and builds on top of applicable legislation and local and international self-regulatory standards.

Our members continue to maintain a strong leadership position in responsible advertising within the industry and use this opportunity to establish an even stronger foundation for robust standards in influencer marketing.

# Definitions

Based on the definition in the European Advertising Standards Alliance's (EASA) [best practice recommendation](#), we will refer to:

- **An influencer** as *“an independent third-party endorser who shapes audience attitudes through blogs, posts, tweets, and the use of other social media, including game streaming platforms. Influencer posts are considered marketing (instead of user generated content) when the influencer has received compensation through financial remuneration, or there has been some form of editorial control by the advertisers.”*

Although influencers are also often referred to as content creators, vloggers, bloggers, or uploaders, they are all third-party endorsers who shape audience attitudes by sharing content to a wide audience through their social media channels.

- **Influencer marketing** as any online *“content for which the influencer has received some form of compensation directly or indirectly from the brand, whether financial or through any other arrangements.”* EGBA refers to the EASA recommendations for further detailed factors of what may qualify as influencer marketing content.

# I. Application of advertising standards

1. EGBA members commit to promote responsible advertising measures for online gambling, to safeguard a high level of player protection and to prevent minors from accessing gambling marketing content. **EGBA's Code of Conduct was conceived from the outset to be and remains applicable in its entirety to all influencer marketing content** produced on behalf of the brand, where legally permitted. Of particular importance for influencer marketing in the Code of Conduct are the following provisions:

- article 5 relating to content moderation, which includes rules so that gambling advertising is clear, responsible and non-misleading;
- article 6 on protection of minors, which includes rules to avoid gambling advertising targeting or appealing to minors;
- article 8 on social media, which includes, where possible, a transparency requirement for influencer marketing (#ad), as well as age-gating mechanisms in gambling operators' social media profiles.

2. Going further, **EGBA members pledge to go beyond what the Code stipulates to ensure that they aim for the highest standards in responsible advertising.**

Members commit that all influencer marketing content published on behalf of EGBA members must:

- include proper advertising transparency disclosure labels as per local legislation or self-regulatory rules. Gambling operators are encouraged to advise influencers to use [DiscloseMe](#)<sup>[1]</sup> to identify the best transparency practice for their local jurisdiction.
- where technically feasible and relevant to gambling marketing content<sup>[2]</sup>, be age-gated with the help of the platform-specific age verification features, to prevent minors from accessing such content. Influencers may refer to dedicated guides on, for instance, [YouTube](#), [Instagram](#), or [Facebook](#) on how to achieve this. Gambling operators may also check the influencer's audience demographic, to help ensure that the influencer limits any underage exposure.

<sup>[1]</sup> Designed and operated by the European Advertising Standards Alliance (EASA), DiscloseMe is a tool designed to help influencers navigate the ever-evolving landscape of disclosure rules in influencer marketing.

<sup>[2]</sup> Age-gating requirement is not applicable to editorial content that is sponsored by EGBA members.

## I. Application of advertising standards (continued)

- always respect local age thresholds and never be aimed at or designed to appeal to minors, as already described by article 6 of the EGBA Code of Conduct.
- not feature any minor. It must not include or refer to school personnel or overtly juvenile behaviour, visual or audio content referencing childhood or adolescence (e.g., rites of passage, pranks, romances, etc.), any setting, visual or audio content that primarily appeals to minors, or refer to sports or objects in a way that is most likely to appeal to minors.
- include a responsible gambling message and age warning, which may be mandated by local legislation, national advertising standards, or as indicated in article 7 of the EGBA code of conduct.

These requirements apply to all forms of influencer content, including live streams, stories, posts, videos, and any digital content formats.

3. EGBA members also commit that their influencer marketing content will abide by both international and national advertising standards, as set out respectively in the [ICC Code](#) (in particular articles 18 on influencer marketing communications and 24 on code responsibility) and in national advertising self-regulatory codes (referred to by [EASA's list of self-regulatory organisations](#) (SRO)).

4. In case of a breach, as decided by a local SRO jury, EGBA members commit to take all appropriate efforts to take down any such influencer marketing content as recommended by the jury.

## II. Influencer selection

1. EGBA members commit to work with influencers who have been screened for responsible marketing conduct and who commit to not featuring marketing posts that would breach any advertising standard or law. EGBA members encourage the influencers they work with to remain on top of the latest applicable legal and self-regulatory frameworks relevant for gambling and influencer marketing, for instance by following influencer-focused training programmes – relevant info can be found on the [Influencer Legal Hub](#).

### III. Monitoring and compliance

1. Where applicable, EGBA members commit to check their influencer marketing content before publication by the influencer, which may include asking the relevant [SRO for copy advice](#), where available.

2. EGBA members commit to monitor their influencer marketing regularly, and where feasible, by independent entities, such as [SROs](#), so as to assess compliance with the present pledge and other relevant standards and legislation. They commit to abide by the monitoring results and take down any non-compliant content.

These provisions will be translated into our members' business practices. EGBA members will engage with influencers to inform them about this pledge and our commitment to promoting a high level of consumer protection and preventing minor exposure to marketing content.