

Draft Guidelines for Responsible Labelling of Synthetically Generated Content in Advertising

Objective and Scope: As brands use technologies like Artificial Intelligence (AI) to improve advertising efficiency, they must ensure their ads remain honest, decent, safe, and fair to meet legal and societal expectations. For this policy, **synthetically generated content** includes any advertisement that is artificially created, modified, or materially altered to appear authentic, including deepfakes, synthetic spokespersons, AI voices, and materially altered imagery.

The guidelines **focus on consumer outcomes rather than regulating the technology itself. Using AI is only considered misleading or harmful** when it creates unfulfillable expectations, exploits vulnerable populations, depicts unsafe situations, or replicates a real person's likeness without consent; **which would be in contravention of Chapter I and III of the ASCI Code**. These guidelines align with the SGI Rules amended on February 10, 2026, to ensure transparency while avoiding consumer label fatigue. All advertisements using AI must comply with the entirety of the ASCI Code.

Risk-Based Framework and Assessment: The requirement to label AI-generated content is based on the risk it poses to consumers. To determine if labelling is necessary, brands should ask the following assessment questions:

- Where AI use is central to an ad's persuasive messaging or materially influences purchase decisions, does it mislead consumers about the product's claims, performance, or benefits?
- Would the absence of a disclosure create a false or misleading impression of the product's claims or benefits ?

1. High Risk (Prohibited Content): High-risk advertisements are those that are illegal, infringe on rights, make misleading claims, or violate the ASCI Code. **These will violate the ASCI code even if an AI label is used.** Examples include:

- A. Fabricating endorsements or testimonials.
- B. Exaggerating product results or features through claims or visual representations to create a misleading impression
- C. Creating fake locations that appear realistic to the consumer (e.g., a travel agency depicting a hotel in a non-existent location or having non-existent facility).
- D. Using deepfakes, copyrighted work, or a person's likeness without consent.
- E. Using AI to generate fictional authority figures with identifiable cues, such as an AI generated fake doctor promoting a supplement, implying medical endorsement/expertise

2. Medium Risk (Labelling Required): Medium-risk advertisements are those where AI use materially influences consumer decisions, and the lack of disclosure would mislead consumers. **Labelling is mandatory in these cases** to help consumers understand the nature of the representation. Examples include:

- A. Using virtual or synthetically generated influencers and ambassadors
- B. Replicating a real person's likeness or voice even with their consent for personalised messaging.
- C. Using synthetically generated visuals for product performance unless the visuals replicate how the product actually performs..
- D. Creating realistic events, settings, or situations entirely with AI.
- E. Demonstrating a product that does not currently exist (e.g., a 3D model of an unbuilt housing complex).

- F. Creating AI-generated exaggerated sound effects that are highly relevant to the product's core features (e.g., audio in an ad for a headset)
- G. Using AI for paid or sponsored product suggestions, which must specifically be labelled as 'sponsored by'.

3. Low Risk (No Labelling Required): Low-risk advertisements feature minor modifications or use AI in ways that have **no material impact on a consumer's ability to make an informed choice**. No label is required for:

- A. **Minor Enhancements:** Routine editing, colour correction, noise reduction, standard blemish removal, and minor lighting tweaks that do not alter the substance or core claims of the ad (e.g., slightly colour-correcting a phone image for clarity).
- B. **Background and Ambient Elements:** Purely decorative AI-generated backgrounds, abstract skylines, ambient music, jingles, or background sound effects (like crowd cheers) that are unrelated to the product's actual capabilities or promise.
- C. **Fantastical Elements:** Obvious, unrealistic effects that audiences recognise as not depicting reality, such as dragons or fairies.
- D. **Administrative and Text Uses:** Generating or enhancing advertising copy, creating audio descriptions for the visually impaired, or preparing documents in good faith without creating false records.

4. Disclosure Labels and Execution:

When disclosures are required, brands may use standard labels like "**Audio/Video created using AI**" or "**Audio/Video enhanced using AI**", or any other alternative labels that accurately inform the consumer. Disclaimers should follow the ASCI Code on disclaimer guidelines where applicable.

The use of synthetically generated content in some cases may be considered misleading or objectionable regardless of labels, if the end effect is likely to mislead or harm the consumer. Advertisements using AI are subject to compliance with the entire ASCI Code.