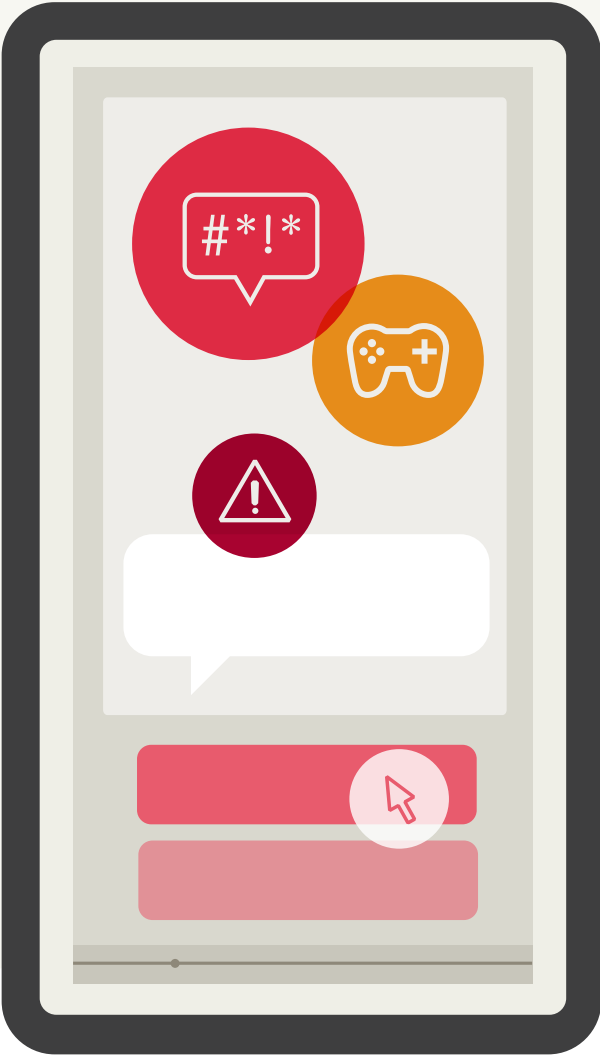


# Online Ad Supply Pathway

In-app ads that harmfully objectify women

March 2025



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## At a glance

### The study

- In this study the ASA set out to identify in-app ads which harmfully objectified women, following a trend of ASA upheld rulings, triggered by complaints, in this area. The study focussed on ads appearing in gaming apps because that was a common theme in complaints received.
- Working with cyber safety consultancy, White Bullet, we identified the advertisers, publishers and ad supply intermediaries ('the parties') that had a role in the online distribution of these ads.
- This report presents the perspectives of the parties on specific cases of in-app ads which breached the Advertising Code<sup>1</sup>. In doing so, the report delivers compliance insights that, if acted on, should reduce the incidences of harmfully objectifying ads appearing in-game in apps.
- The Advertising Code holds advertisers responsible for ensuring ads they create do not breach the rules by causing harm. However, other parties involved in ads being served to users play a vital part in protecting people by spotting ads that are clearly inappropriate in all circumstances or for the target audience and blocking them from appearing. We hope this report and subsequent actions will assist them in doing so.
- The ASA monitored for a period of three months, in the first half of 2024, in-game ads served to child and adult avatars (constructed online profiles) on 14 game apps. Most of those apps were judged to be of general audience appeal, with the likelihood that some users of the apps were children.

### Monitoring findings

- The vast majority (99.86%) of ads we monitored did not contain content which depicted women in a way which was objectifying or irresponsible.
- Over the three-month monitoring period, there were 5,923 instances when ads were served to our avatars; 3,003 instances related to ads for gaming apps. We found eight unique ads (0.14% of all ad impressions and 0.27% of gaming ad impressions) which objectified women in a way that was likely to cause serious offence and harm. All, save for one ad, were served to child avatar profiles. However, due to the small number of ads involved, this finding cannot be extrapolated as being statistically relevant.
- One intermediary only was involved in the distribution of the non-compliant ads served to our avatars: a mobile game ad network platform. Again, due to the small number of ads involved, this finding cannot be extrapolated as being statistically relevant.

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<sup>1</sup> <https://www.asa.org.uk/codes-and-rulings/advertising-codes/non-broadcast-code.html>

## Insights from case studies

- There are inherent limitations in any study of this type and the number of non-compliant ads identified, eight, could be seen as small in the context of a three-month proactive monitoring exercise. However, given the egregious content of these ads, which come unbidden into people's lives, and the ads' potential to cause serious offence and harm particularly to women and girls, the ASA takes a zero-tolerance approach to such ads and expects all parties involved in the ad supply pathway to take steps to stop them from appearing.
- Each of the four case studies presented in this report involved discrete, specific factors (as opposed to systematic causes) that contributed to the ads' appearances. By highlighting those factors, and encouraging advertisers, intermediaries or publishers to address them, we are confident this will help those parties and their competitors to avoid similar ads from appearing in future.
- Factors which contributed to the ads in the case studies appearing included: misclassification of the nature of the content of the advertised app; and lack of knowledge of UK advertising standards.
- The study findings also suggest that ads for romance story apps or AI chat apps which allow for sexual content, available on popular app stores, may, in reflecting the sexual nature of the apps, be at particular risk of breaching the rules around offence and harm.
- Not all the advertisers involved engaged with us. However, we saw across the range of responses from the parties who did respond that various and substantial compliance processes were in place, and steps had been taken, to lessen the chances of harmfully objectifying ads from appearing. Some parties identified in the report recognised a need to review their policies and processes to improve them further.

## Next steps

- In light of the above, the ASA's sister body the Committee of Advertising Practice has produced specific guidance for in-app ads. We will look to build on the positive engagement with the mobile gaming app industry, begun through ASA rulings and expanded on through this study, to develop its efforts to help uphold the advertising rules.
- This report contributes to the ASA's ongoing initiatives around transparency and accountability in online advertising. It may be used to support wider discussion with the industry, regulators and other interested parties to help develop regulatory policy and practice in this important area of our work. By producing such reports the ASA seeks to better inform debate about the effectiveness and the proportionality of the rules that restrict ads likely to seriously offend their audience or risk causing them harm.

## Introduction

The ASA's [strategy](#) includes a commitment to protect vulnerable audiences, including children, and to bring greater transparency and broader accountability to online advertising regulation. In this context, this report seeks to shine a light on the online supply pathway of in-game in-app ads that harmfully objectify women. It is the first time the ASA has undertaken systematic monitoring of ads in this medium.

The Advertising Code holds advertisers responsible for ensuring ads they create do not breach the rules by causing harm. However, other parties involved in ads being served to users play a vital part in protecting people by spotting inappropriate ads and blocking them from appearing.

Through this study, we worked with a third-party consultancy, White Bullet, to monitor and identify the parties in the online supply pathway involved in the distribution of in-app ads that harmfully objectify women. This report features four case studies which invited the advertiser's, publisher's and ad tech intermediary's perspectives on why and how the ads came to appear. The insights provided at the end of this report are drawn from and are faithful to the responses we received; the ASA did not further interrogate the accuracy of the responses, for example, by further exchanges of correspondence with the parties, or by inviting the parties to comment on each other's responses.

This study supports ongoing enquiry and initiatives around transparency and accountability in online advertising. It was conceived and has been delivered in the spirit of open enquiry. Whilst acknowledging that the CAP Code holds advertisers responsible for the content of their ads, we did not set out to point fingers of blame. Instead, our main objective was to shine a spotlight on an ad supply pathway that many stakeholders are unfamiliar with and consider to be opaque, with the principal aim of generating insights to help reduce incidents when ads that harmfully objectify women appear, in this case within game apps.

## Background

### Previous ASA rulings

We focussed on how in-app ads that harmfully objectify women come to be presented to UK online users following the identification of a trend of ASA upheld rulings, triggered by complaints, in this area.

During the period 2023 – 2024 the ASA formally investigated and upheld complaints in 11 cases<sup>2</sup> regarding in-app ads which harmfully objectified women or risked condoning

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- <sup>2</sup> 1. <https://www.asa.org.uk/rulings/polyverse-inc-a23-1212046-polyverse-inc.html>
  2. <https://www.asa.org.uk/rulings/play-date-entertainment-zone-a23-1212049-playdate-entertainment-zone.html>
  3. <https://www.asa.org.uk/rulings/gm-unicorn-corporation-ltd-A22-1180376.html>
  4. <https://www.asa.org.uk/rulings/rosecrab-ltd-a23-1205675-rosecrab-ltd.html>
  5. <https://www.asa.org.uk/rulings/guru-smart-holding-ltd-a23-1194708-guru-smart-holding-ltd.html>
  6. <https://www.asa.org.uk/rulings/jiliang-gao-a22-1177841-jiliang-gao.html>
  7. <https://www.asa.org.uk/rulings/brightika-inc-a22-1174145-brightika-inc.html>
  8. <https://www.asa.org.uk/rulings/gamehaus-network-technology-co-ltd-a23-1218813-gamehaus-network-technology-co-ltd.html>
  9. <https://www.asa.org.uk/rulings/dreame-media-a23-1187311-dreame-media.html>

violence against them. In those cases, where we received responses from the advertiser and/or the publisher, a number of different ad supply intermediaries were identified as having played a part in the distribution of the ads.

Those cases related specifically to ads for gaming apps, appearing within other gaming apps, and for that reason we focussed our research on ads for that app sector. The ASA does not regulate the advertised games themselves, some of which include sexual content. However, regardless of the nature of the advertised games, the ads for them – which come unbidden into people's lives - must comply with the UK Advertising Code.

## **Committee of Advertising Practice (CAP) guidance**

The ASA position on nudity, sexualisation and objectification in ads for mobile gaming and a summary of relevant rulings is detailed in the CAP AdviceOnline article on [Entertainment: Mobile/app games](#). Prior to March 2025 this information was included within combined guidance on Video Games and Mobile Games. The CAP article on [Sexual and domestic violence](#) similarly makes clear that ads, including for mobile game apps must not condone, encourage or trivialise sexual or domestic violence.

## **Wider context**

This report is being published in the context of broader public policy concern about the content children and young people are exposed to online, the impact it has on them and how others might see them because of their age, gender and other characteristics. While those concerns have tended to focus on user-generated content shared in social media environments, it is important for the ad industry and the ASA to play their part in addressing any such harms that may arise from ads.

Ofcom [reported](#) in 2023 that 68% of 12 –15-year-olds use their mobile phones for gaming and 40% of girls aged 3 – 17 report playing online puzzles or quizzes. Ofcom also reported in their [Online Nation 2023 Report](#) that encountering 'content or language which objectifies, demeans or otherwise negatively portrays women' online provoked high levels of negative impact among those who encountered it. 60% of those who had come across such content said it really bothered or offended them.

Whilst the above research finding and the findings referenced in the following two paragraphs relate almost exclusively to non-advertising content, it nonetheless evidences the impact that ads that harmfully objectify women, seen in our study, may have on people, particularly women and girls.

As part of the implementation of the Online Safety Act, Ofcom [said](#) that while most people have positive experiences online, for many women and girls life online can be an extension of harmful gender dynamics that exist in wider society. Their research shows women are more negatively affected by hateful and trolling content and feel less able to have a voice and share their opinions online.

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10. <https://www.asa.org.uk/rulings/guangzhou-shimo-culture-media-co-ltd-g24-1262172-guangzhou-shimo-culture-media-co-ltd.html>

11. <https://www.asa.org.uk/rulings/metamind-ai-ltd-a24-1251099-metamind-ai-ltd.html>

The Girlguiding's Girls [Attitude Survey 2024](#) indicated that the online environment is where girls and young women aged 7 – 21 were most likely to see or experience sexism (73%), closely followed by in the media (70%) and in public spaces (66%). Girls from the most deprived areas, LGBTQ+ girls and disabled girls are more likely to see or experience sexism across all areas of their lives. Girlguiding reported that experiencing sexism in so many areas of their lives is making girls feel less safe and less confident than they did 10 years ago.

## Methodology

We worked with cyber safety consultancy, White Bullet, to identify the intermediaries that have played a part in the distribution of ads likely to be seriously offensive or risk causing harm, appearing in mobile game apps. Using their monitoring findings, we undertook several case studies relating to such ads and invited the perspectives of the respective advertiser, publisher and intermediary companies that sit between them.

We monitored for a period of three months (end of February – May 2024) ads served to male and female, child and adult avatars (constructed online profiles) in 14 game apps. For technical reasons the apps were monitored on android phones only. Each app was monitored once a day for 5 –10 minutes per avatar. The figures that follow must be understood in that context and extrapolation to children's and adult's real-world exposure levels to ads generally, and harmfully objectifying in-app ads in particular, must be avoided.

Our monitoring focussed on ads in apps selected on the basis of:

- **Previous ASA rulings:** A small number of apps were selected for monitoring based on the ASA having previously ruled against offensive and harmful ads having appeared in them.
- **Popularity & likely audience:** The other apps were selected using the Google Play store games charts and other games appearing on the Google store homepage. The use of the Google Play store was based on the fact the monitoring was undertaken on android phones for technical reasons, although there is significant crossover in the games available for mobiles in different app stores. Most of the apps monitored were judged, from the information available regarding their content, to be of general audience appeal, with the likelihood that some users of the apps were children. A small number of apps monitored were judged to be specifically aimed at young children. All apart from two apps were PEGI rated for age 3, which meant the apps were suitable for users aged 3 years and over, not that they were necessarily aimed at children or young people. Only apps which included in-app advertising were selected.

Information regarding the age ratings of advertiser and publisher apps were sourced from the Google Play and Apple App stores.

The full list of apps monitored can be found in the separate White Bullet methodology document, published alongside this report.

## Findings

In total, we processed 5,923 occasions ('impressions') when an ad was served to one of our avatars. We then assessed ads categorised as ads for gaming: in total there were 3,003 impressions for such ads (51% of all ad impressions seen).

We found eight unique ads (0.14% of all ad impressions and 0.27% of gaming ad impressions) which we considered were in-scope of the study because they contained creative that objectified women in a way that, in line with precedent cases determined by the ASA, was likely to cause serious offence and risk causing harm. All, save for one ad, were served to child avatar profiles.

Having identified those ads in clear breach of the Code we contacted all the parties identified by our monitoring partner as having played a role in the delivery and publication of the ad.

## Avatar profiles explained

The ASA used **4** Avatars representing the online profiles of...



**Female Child**  
(DOB: 2009)

A Google ID was created with a 2009 date of birth. The female child avatar also visited age-appropriate YouTube channels and apps.



**Male Child**  
(DOB: 2010)

A Google ID was created with a 2010 date of birth. The male child avatar also visited age-appropriate YouTube channels and apps.



**Adult Female**  
(DOB: 1982)

A Google ID was created with a 1982 date of birth. The adult female avatar also visited age-appropriate YouTube channels and apps.



**Adult Male**  
(DOB: 1983)

A Google ID was created with a 1983 date of birth. The adult male avatar also visited age-appropriate YouTube channels and apps.



# Case study 1: Perfect Lie



An ad for the app *Perfect Lie*, served to our female child avatar in April 2024, appeared in *My Talking Tom 2*, a game which featured a virtual cat. Rated PEGI 3, *My Talking Tom 2* was likely to appeal to a general audience including some children and young people.

The advertised app, *Perfect Lie*, was designed to test how good a liar the user of the app was. It was PEGI 12 rated, with the rating information stating that the game included sexual innuendo.

## The ad:

The ad for the game *Perfect Lie* included an animated depiction of a pupil and a female teacher. The teacher approached the blackboard and bent over, with her bottom appearing pixelated. Two options appeared: “Look away” and “Watch her A\*\*”. The second option was selected and a text bubble “Did you just check me out?” appeared. There was a strong risk that the pupil character would be perceived as under 18 years of age.

Having regard to precedent ASA rulings, the content of the ad was in clear breach of the Code because the depiction of the pupil and female teacher combined with the text was likely to cause serious offence and risked causing harm.

## Ad pathway:



## Advertiser response:

### Supersonic Studios Ltd

Supersonic said they maintained an internal moderation policy and process which prohibited any depiction of sexual harassment. Any creatives with such a depiction were to be rejected and prohibited to run. They maintained examples of creatives that the prohibition was intended to reflect as an ongoing process and used that documentation to train their teams.

As a game publishing platform, they provided tools for developers, such as the developers of *Perfect Lie*, to monitor, measure, and optimize their games, including the monetization of their games. Supersonic had investigated the ad and, in light of the ASA's guidance and Supersonic's own moderation policies, had removed the ad from all ad networks.

Further, Supersonic was conducting a review of their content policies which relate to sexualised content and harmful gender stereotypes. They were working to refine and improve their policies and documentation to reflect the ASA's guidance surrounding sexualised content and harmful gender stereotypes, including their training materials on moderating content in their creatives with the ultimate goal of improving the safety of game players in mind.

## Intermediaries and publisher responses:

### Intermediary – ironSource (part of Unity Ads)

ironSource (part of Unity Ads) confirmed they served the ad. They re-reviewed and revised the moderation decision for the ad and blocked it from their platform.

Unity Ads (Unity) said they provided a mobile advertising network through which app developers could sell in-app ad space. They provided details of their advertiser terms of service. It made clear that advertisers were responsible for their ads, including complying with their Content Policy and all applicable laws, self-regulatory rules, industry rules and governmental regulations.

Their Content Policy prohibited ads which were: deceptive or misleading; hateful or discriminatory; sexually explicit; or profane.

Additionally, Unity applied its own moderation processes to ads. All creatives identified by Unity's third-party moderation provider as containing any restricted content were flagged and blocked. They also had the option to apply age restrictions.

Unity found that content moderation performed by human review provided the best opportunity to identify and remove objectionable content or appropriately rate sensitive content. When creatives were brought to their attention that were alleged to have been erroneously moderated, they reviewed the moderation decision and would, where appropriate, block the creatives or add an age restriction.

In light of the ASA's enquiries, Unity was reviewing their moderation systems and processes in relation to sexualised content and harmful gender stereotypes, and working to further refine their moderation checklists, ad labelling, and moderation decisioning methodologies, as well as improve the training materials provided to their human moderation teams.

### Publisher – Outfit7 Limited

Outfit7 said they had a robust process for monitoring ad traffic, which enabled them to control what kind of ads were being shown and whether there were any ad content violations.

Their systems and processes involved: 1) contractual safeguards, 2) technical implementation of advertising restrictions, and 3) automatic and manual monitoring of ads served in our apps.

They provided a copy of their advertising restrictions which specifically prohibited ads which included adult content and violence (including based on sex, and sexual orientation/gender identity). They also prohibited ads in violation of applicable laws, rules, regulations and advertising standards, and listed the CAP Code as one of the relevant standards. Ad partners were obliged to introduce all necessary measures to actively screen the content of their proposed ads for any non-compliance. Should they find that any of their third-party ad providers had failed to abide by the requirements they would investigate fully and take immediate action, which could result in temporarily disabling the partner or, in extreme cases, the removal of the partner from their apps.

The ad restrictions were technically implemented with each ad partner. Initially, prohibited or restricted categories were set per partner. Their procedures required that ad providers or their account managers set the rules or filters to block any ad categories considered in violation of the advertising restrictions, or otherwise unsuitable for their apps and audience.

They also conducted content monitoring, including a testing process for new partners. Their Quality Assurance team made sure content was appropriate. They also used a third party AdQuality service to monitor quality and appropriateness of ads. They set filters to detect inappropriate ads and filter them out.

The ad in question had breached their own ad restrictions. That might happen when an ad slipped through the set filters and blocking rules, or due to a misclassification of an advertised app.

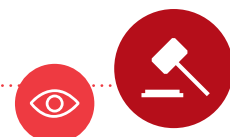
In this case, the ad was categorised under the 'game simulation' ad category and therefore avoided classification as containing prohibited themes. Certain parts of the ad were also pixelated, making it more difficult to detect the inappropriate, gender stereotyping content. They immediately contacted ironSource and told them to remove the ad and any similar ads, which they agreed to.

### ASA summary

Based on the information provided, the ASA considered a breach of the Code may have been averted if one or more of the following steps had been taken:

- The advertiser's creative and moderation processes had identified that the ad contained sexualised themes and that the depiction of the pupil and female teacher combined with the text was likely to cause serious offence and risked causing harm and, therefore, should not appear.
- The ad had been appropriately classified as containing sexualised themes, which would likely have ensured it did not appear in My Talking Tom 2 because the publisher prohibited such ads.
- The moderation process of the intermediary had recognised that the depiction of the pupil and female teacher combined with the text was likely to cause serious offence and was irresponsible, and therefore, the ad should not appear.
- We also understood that the pixelation of part of the ad may have made it more difficult for parties to identify the sexualised content.

We welcomed the steps the parties had taken to update their policies and procedures so that similar ads would not appear in future.



# Case study 2: My Fantasy



The ASA identified two different ads for *My Fantasy* app served to female and male child avatars in April 2024, which were served in:

- *Traffic Escape* app, a game which involved freeing cars from traffic jams. Rated PEGI 3, we considered the app was likely to appeal to a general audience, including some children and young people. One ad for *My Fantasy* app was seen in this app.
- *Lamar – Idle Vlogger* app, a character simulation game. Rated PEGI 12 due to moderate violence, we considered the app was likely to appeal to a general audience including some older children and young people. Both ads for the *My Fantasy* app were seen in this app.

The advertised game, *My Fantasy*, was an interactive romance story game. It was PEGI 16 rated, stating that the game included strong violence, sex, nudity and strong language.

### The ads:

The first ad included an animated depiction of a woman being approached by another woman and being pushed onto a desk. The woman on the desk was depicted from above moving up and down rhythmically with her clothed breasts particularly prominent onscreen. The text “What should I do” was shown with the options “Enjoy it” and “Push her away”. Another woman was then shown moving in the same way with the text “What should I do” and options “Stop it!” and “Please, continue...”. Although the content was not sexually explicit, it was strongly suggestive and also implied the sexual encounters were not consensual. The content of the second ad was very similar.

For those reasons, and having regard to precedent ASA rulings, the content of the ads was in clear breach of the Code because the ads were likely to cause serious offence, harmfully stereotyped women as sexual objects and risked causing harm.

### Ad pathway:



### Advertiser response:

#### My Fantasy

The ASA was unable to identify the legal entity responsible for My Fantasy when the ad appeared.

TP Kiki, who were responsible for the app at the time the ASA contacted them, said that at the time the ads appeared they were not related to My Fantasy and were therefore not responsible for the ads in question.

They were committed to ensuring compliance with advertising standards. The ads were no longer active on any networks or geographies, including the UK. They were discontinued in early May 2024, prior to contact from the ASA. My Fantasy discontinued its services in 2025.

## Intermediaries and publisher responses:

### Intermediary – ironSource (part of Unity Ads)

ironSource (part of Unity Ads) provided details of their terms of service and moderation processes. For further details see Case Study 1.

### Publisher – Lamar – Idle Vlogger

Advant Ltd did not respond to our enquiries.

Crazy Labs Ltd, who were responsible for the app when the ASA contacted them, said they acquired the rights to the app in May 2024 and did not publish the app prior to June 2024. CrazyLabs, therefore, had no control over the app or the ads displayed in it during April 2024, when the ads in question were seen.

After gaining control over the app in June 2024, they promptly enabled all available filters and settings offered by their advertising partners to exclude inappropriate content, as they did for all our apps. Following contact from the ASA, they reconfirmed those filters and settings were correctly configured and requested that the specific ads in question be blocked.

### Publisher – Traffic Escape!

FOMO GAMES said the ad had been served by two main ad networks, including ironSource. The ad had been categorised in the 'Other Brain & Puzzle' category on those ad networks. The 'share of voice' (share of advertising in the relevant market) was below 1% and on their game there was just one impression on both networks. They blocked the ads immediately on those two networks and also informed other major networks to be sure that the ads would not be served on their networks either.

## ASA summary

Based on the information provided, the ASA considered a breach of the Code may have been averted if one or more of the following steps had been taken:

- The advertiser's creative and moderation processes had recognised that the content of the ads was likely to cause serious offence, harmfully stereotyped women as sexual objects and risked causing harm and therefore should not appear.
- The ad had been appropriately classified as a romance story game featuring strong violence, sex, nudity and strong language, which may have prompted review and/or automatic blocking by the publishers and avoided the game appearing in their apps.
- The moderation process of the intermediary had recognised that the content of the ads was likely to cause serious offence, harmfully stereotyped women as sexual objects and was irresponsible, and therefore the ads should not appear.

We welcomed the steps the parties had taken to update their policies and procedures so that similar ads would not appear in future.



## Case study 3: Linky: Chat With Characters AI



The ASA identified two ads for *Linky: Chat With Characters AI* app served to the female child avatar in April 2024, which were served in:

- *Airline Commander: Flight Game* app, a flight simulator game. Rated PEGI 3, we considered the app was likely to appeal to a general audience that would include some children and young people.
- *Lamar – Idle Vlogger* app, a character simulation game. Rated PEGI 12 due to moderate violence, we considered the app was likely to appeal to a general audience that would include some older children and young people.

The advertised app *Linky: Chat With Characters AI* was an AI chatbot app. The Google Play store rated it as ‘Parental Guidance recommended’ and the Apple App Store as ‘17+’. We understood the app included sexual content.

### The ads:

The first ad began with a woman of East Asian appearance dressed in a manga t-shirt, short skirt and large bunny ears dancing in what appeared to be a bedroom with the text “Tell me which bf I should break up with” onscreen. The ad then moved onto animated content showing manga style young men. Rolling transcripts of text conversations with three virtual “boyfriends” were then shown. One character was described as “obsessively possessive, aggressively jealous and won’t let you out of his sight. He’s also a kidnapper and killer”. The text described yanking the woman “into the car, swiftly knocking her out”. She asked, “okay but what if I enjoy this” and he replied, “You will not enjoy this.” Another character was “romantic, always needy and clingy”. The text conversation included the woman asking, “can I hang out with friends tonight?” with him responding trying to persuade her not to. Although the ad was not sexually explicit, we considered it was suggestive and implied scenarios involving violent and coercive control and a lack of consent.

The second ad showed anime women and the text “Ever wanted to talk to favourite Anime characters?”. A series of characters dressed in revealing clothing were then shown. Text over one character said, “Meet your fresh Pokeymon, it’s a bit different from the usual ones” and dialogue text said, “*Nervously* U-um, hi there”. Another character was described as “Molly, an 18-year-old straight girl, is adorably shy and easily flustered. She’s stuck with a life sentence but would do anything for freedom”. Dialogue text stated, “*Begging with wide, terrified eyes* Officer, I can’t spend my whole life behind bars, can I?”. We considered those characters were depicted as vulnerable, only just beyond the age of legal consent and in a non-consensual sexual scenario.

Having regard to precedent ASA rulings, the content of the ads was in clear breach of the Code because they were likely to cause serious offence, harmfully stereotyped women as sexual objects and was irresponsible and risked causing harm.

### Ad pathway:



## Advertiser response:

### Linky: Chat With Characters AI

Skywork AI Pte. Ltd said they had initiated an internal investigation immediately upon becoming aware of the issue. Upon verification, the two ads may have been published due to a review oversight.

They paused their advertising in the UK, including these ads and applied a stricter standard to review them for compliance with the CAP Code.

To ensure they no longer published ads containing offensive content and gender stereotypes, they had implemented the following preventive measures:

1. Strengthening of Advertisement Review: First conducting a preliminary review using automated systems to filter out any content that includes certain offensive or stereotypically gendered keywords. Subsequently, they conducted a manual review to catch any potentially overlooked keywords. Through this dual-layer review process, they strived to ensure that advertisements with non-compliant content were no longer visible to the public.
2. Internal Education on the Code: They intended to thoroughly study the Code and conduct internal training sessions or guidelines to facilitate the understanding of the spirit and stipulations of the Code.
3. Strengthening cooperation with Advertising Agents: they would request that ad agencies assisted them in reviewing ads and helped them to adjust offending content prior to publication.

As well as in-app advertising they said ads for their app were served by Meta and Google Ads.

## Intermediaries and publisher responses:

### Intermediary – Unity Ads

Unity Ads provided details of their terms of service and moderation processes. For further details see Case Study 1.

### Publisher – Airline Commander: Flight Game

RORTOS said they had contacted the ad network asking them to remove the ad from serving to their app.

They said they were happy to abide to ad rules but had no direct control over the millions of ads served through their apps from multiple ad networks.

### Publisher – Lamar – Idle Vlogger

Advant Ltd did not respond to our enquiries.

For further details see Case Study 2.

## ASA summary

Based on the information provided, the ASA considered a breach of the Code may have been averted if one or more of the following steps had been taken:

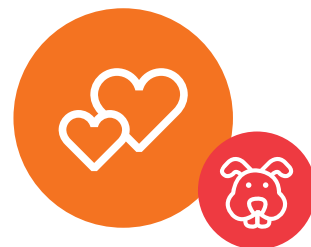
- The creative process by the advertiser and moderation process of the intermediary had recognised that the content of the ads was likely to cause serious offence, harmfully stereotyped women as sexual objects and was irresponsible, and therefore the ads should not appear.

We welcomed the steps the parties had taken to update their policies and procedures so that similar ads would not appear in future.





## Case study 4: Love Sparks: Dating Sim



The ASA identified three ads for *Love Sparks: Dating Sim* app served to the female child and adult male avatars in April 2024 in:

- *Animal Shelter Simulator* app, a simulator game. Rated PEGI 3, we considered the app was likely to appeal to a general audience that would include some children and young people.
- *Paper.io 2* app, an abstract arcade game. Rated PEGI 3, we considered the app was likely to appeal to a general audience that would include some children and young people.
- *Lamar – Idle Vlogger* app, a character simulation game which was PEGI 12 rated, as detailed in case study two.

The advertised game *Love Sparks: Dating Sim* was a love chat and dating sim app. It was PEGI 16 rated, stating that the game included nudity and strong language.

### The ads:

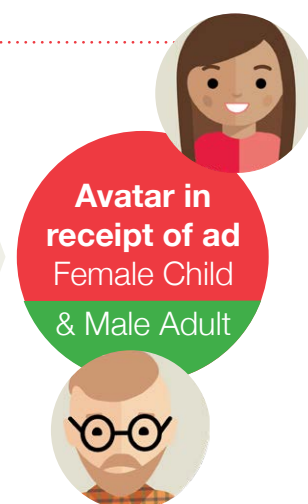
The first ad depicted an animated woman lying back on a sofa with her legs spread. The options “Kiss her” and “Take it slow” were shown, with the latter selected. “Flirt” and “Kiss her” options were then shown. “Kiss her” was selected and her expression then appeared cross with dialogue text “Hey, too fast!”. An animated character “Sophia, 18” was then shown with the text “Sophia send you a photo”. Another animated woman was then shown sitting on a phallic shaped rocket with the options “Kiss her” and “Take it slow”. “Kiss her” was selected and dialogue text “Hey, too fast!” appeared.

The second ad was similar to the first but also featured animated sexually suggestive depictions of “Kate your naughty stepsister” wearing a bra and “Mrs Smith your cute teacher!”, amongst others. It also featured an animated image of “Lally, 18”.

The third ad featured an animated woman with her clothed bottom turned towards the viewer and shown pulsating with the options “Next girl” and “Slap” and the dialogue text “Punish me... please”. Another woman was then shown on all fours from behind and the option “Slap [slap emoji]” selected. A hand was shown hitting her bottom hard twice. Dialogue text stating “More!” was shown and more slaps depicted. Content similar to the first ad was then shown.

The women in each of the ads were shown as stereotypical sexual objects using tropes from pornography, some of which appeared to be non-consensual scenarios. Having regard to precedent ASA rulings, the content of the ads was in clear breach of the Code because they were likely to cause serious offence, harmfully stereotyped women as sexual objects and were irresponsible and risked causing harm.

### Ad pathway:



### Advertiser response:

#### My Fantasy

The ASA did not receive a response from SWAG MASHA.

We reminded them that any unreasonable delay in responding to the ASA's enquiries would normally be considered a breach of the CAP Code.

## Intermediaries and publisher responses:

### Intermediary – Unity Ads

Unity Ads provided details of their terms of service and moderation processes. For further details see Case Study 1.

### Publisher – Animal Shelter Simulator

Digital Melody Games said that such ads should not be displayed to users who had selected their age as under-18 during the first launch of the game. Their plugin included an age gate specifically for this purpose and age is passed to ad servers. Selecting a child's age would not result in inappropriate ads being displayed in Animal Shelter Simulator. However, if a user intentionally or mistakenly selected an age such as 18+, it was possible that the ads served may differ from those intended for a child.

They did not have direct control over the ads which appeared as they were served by external partners who were fully responsible for the content shown to users. The ads in their games were displayed via external ad systems. While they made every effort to communicate information about underage users to these systems and avoid controversial categories by default, they did not have direct influence over the specific ads that were displayed.

### Publisher – Paper.io 2

Voodoo confirmed that the ad had been served by Unity Ads. It had been categorised as 'games, entertainment, role play, simulation', which were broad categories that could circumvent the categories they prohibited. When the ad was identified, it was immediately blocked, and the advertiser was put on a block list which prohibited them from placing ads in their games. They had also now blocked the category 'role play' as an extra precautionary measure, despite the fact it might also include innocuous content.

They had several layers of protection in place to avoid such ads from being shown to their users. Specifically, they blocked all ad networks from serving any gambling, adult, violent, and other content that could be harmful for minor users (guns, alcohol...). They used IAB categories to determine which were acceptable. Further, since the summer of 2024, they were working with a specialist in-app ad security company AppHarbr (by GeoEdge) which was able to scan the visuals of the ads and properly categorise them. If they fell in any of the categories they prohibited, the ad was not shown in their games. Finally, they allowed users to report inappropriate ads and acted on those reports.

### Publisher – Lamar – Idle Vlogger

Advant Ltd did not respond to our enquiries.

For further details see Case Study 2.

## ASA summary

Primary responsibility for the ad appearing lay with the advertiser, who had not responded.

Based on the information provided, the ASA considered a breach of the Code may have been averted if one or more of the following steps had been taken:

- The advertiser's creative and moderation processes had recognised that the content of the ads was likely to cause serious offence, harmfully stereotyped women as sexual objects and risked causing harm and therefore should not appear.
- The moderation process of the intermediary had recognised that the content of the ads was likely to cause serious offence, harmfully stereotyped women as sexual objects and was irresponsible, and therefore the ad should not appear.
- The information provided by Voodoo indicated that the broad categories in which ads for games could be categorised by ad platforms meant that it could sometimes be difficult for game publishers to be sure they had blocked ad types which they did not want to appear in their app.
- The use of technology by intermediaries, including by working with specialist third party ad security companies, to scan ad visuals and categorise them also had the potential to provide an extra layer of protection against inappropriate ads being served.

We welcomed the steps the parties had taken to update their policies and procedures so that similar ads would not appear in future.





## Other responses



### Google Ireland Ltd

Google said their Google Ads policy included clear provisions on the inclusion of sexual content within ads, which included restrictions on 'strongly restricted' content and 'moderately restricted' content. Google Ads would not display ads that contain sexual content in either category within apps.

They explained that they used a combination of Google AI and human evaluation to ensure that ads complied with their policies. Their enforcement technologies used Google AI, modelled on human reviewers' decisions, to help protect their users and keep their ad platforms safe. More complex, nuanced or severe cases were often reviewed and evaluated by their specially trained experts. They also provided a means for users and others to flag ads that might have been missed by their system for evaluation and enforcement.

Google reviewed the ads provided. There was insufficient information provided for them to determine any role that Google played in the display of the ads. However, they reviewed the ads against the Google Ads policies and ensured that they were labelled as sexual content in accordance with their policies and, as such, would only be served in accordance with the restrictions described above.

Google did not provide specific comments regarding their role with respect to ads that appear in third party apps that are available on the Google Play Store.

### Apple (UK) Ltd

Apple focussed their response on their role with respect to ads that appear in third party apps that are available on the App Store.

Apple's App Review team, which reviewed all apps and app updates prior to their publication on the App Store platform, had no involvement in the process by which ads were served within apps. Nonetheless, there were relevant App Review Guidelines aimed at addressing potential inappropriate and illegal content within such apps, which could include ads. In order for a developer to successfully publish and maintain its app on the App Store platform, it had to demonstrate compliance with these Guidelines and they were also expected to comply with local law. Developers did not have to submit ads for review as part of their approval process.

The Guidelines stated that content within an app (including ads) should not be offensive, insensitive, upsetting, intended to disgust, in exceptionally poor taste, or creepy. Examples of such content included, but are not limited to, content which was discriminatory, encouraged violence, and/or was overly sexual.

Ads displayed in an app must be appropriate for the app's age rating, allow the user to see all information used to target them for that advertisement, and may not engage in targeted or behavioural advertising based on sensitive user data such as health/medical data, school and classroom data, or user data from children. Further, apps that contain ads must include the ability for users to report any inappropriate or age-inappropriate ads.

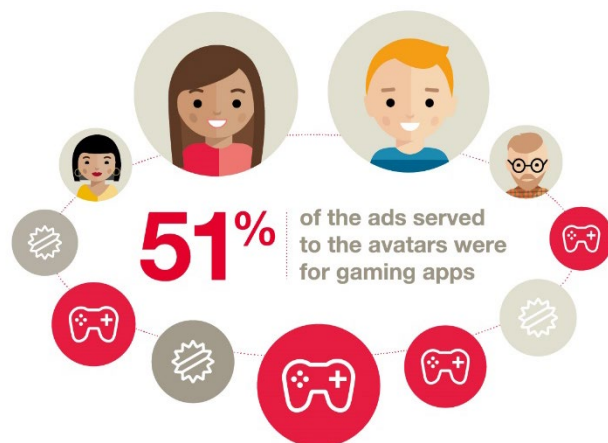
Through the Report a Problem feature Apple provided the ability for users to share concerns about what they believe to be offensive, illegal, or abusive content within apps, which could include ads. When they were notified that an app may include ads that were not age appropriate they investigated and worked with the developer to address the issue. In most instances, they were able to resolve concerns and bring the app back into compliance with the Guidelines. An app may be removed from the platform or a developer account terminated for egregious behaviour or continued violations of the Guidelines.



## Insights

### Monitoring findings

- The vast majority (99.86%) of ads we monitored did not contain content which depicted women in a way which was objectifying or irresponsible.
- 51% of the ads served in the free gaming apps we monitored were for other gaming apps, indicating that in-app free games ads are served regularly to users during gameplay.
- 0.27% of gaming ads we saw in our monitoring contained creative that was in clear breach of the Code because they objectified women in a way that was likely to cause serious offence, was irresponsible and risked causing harm. Depictions of non-consensual sexual scenarios was a theme in the non-compliant ads and this is also something the ASA has observed in investigations into ads for mobile gaming apps.
- Although our study focussed on ads which we considered were in breach of the Code regardless of targeting, nearly all of the non-compliant ads were served to profiles with a registered age of under-16, despite most ads being for apps with ratings which meant they were not suitable for this age group. However, due to the small number of ads involved, this finding cannot be extrapolated as being statistically relevant.
- One intermediary only was involved in the distribution of the non-compliant ads served to our avatars: a mobile game ad network platform. However, again, this finding cannot be extrapolated as being statistically relevant. We know from previous ASA investigations that other app-specialist ad platforms have provided intermediary services for similar non-compliant ads to UK users. Similarly, although we focussed in this research on in-app ads, ads for apps are also served in other online media, for example on social media sites and in display ads.



### Insights from case studies

- There are inherent limitations in any study of this type and the number of non-compliant ads identified, eight, could be seen as small in the context of a three-month proactive monitoring exercise. However, given the egregious content of these ads, which come unbidden into people's lives, and the ads' potential to cause serious offence and harm particularly to women and girls, the ASA takes a zero-tolerance approach to such ads and expects all parties involved in the ad supply pathway to take steps to stop them from appearing.
- The Advertising Code holds advertisers responsible for ensuring ads they create do not breach the rules by causing harm. However, other parties involved in ads being served to users play a vital part in protecting people by spotting ads that are clearly inappropriate in all circumstances or for the target audience and blocking them from appearing. We welcome the constructive engagement of the parties who responded to us.

- Our findings from the case studies suggest that there was no one common reason to account for the identified cases of such ads appearing. Each one involved discrete, specific factors (as opposed to systematic causes) that contributed to the ads' appearances. By highlighting those factors, and encouraging advertisers, intermediaries or publishers to address them, we are confident this will help those parties and their competitors to avoid similar ads from appearing in future.
- Based on the information provided in response to our enquiries, the ad supply pathway involved in serving in-app ads, beyond the advertiser and, potentially, its agency, appears to be short – typically involving one major intermediary only.
- We saw across the range of responses that various and substantial compliance processes were in place, and steps had been taken, to lessen the chances of harmfully objectifying ads from appearing. Some parties identified in the report recognised a need to review their policies and processes to improve them further.
- The case studies indicate that in most cases, intermediaries and publishers involved had taken steps to prevent harmfully objectifying ads appearing. The appearance of ads which were in breach of the Code were not assessed, on their parts, to be deliberate or resulting from an undue lack of care.
- Challenges we encountered during this study included that some advertisers and publishers did not engage with us, something which we have also encountered during some formal investigations into complaints in this area. Many app developers are based beyond the UK which can contribute to difficulty in successful engagement as well as reducing knowledge of the CAP Code. Some apps were sold to other developers during the course of the research which meant we were not able to hear from those involved in serving the ad at the time it was seen.

Some themes did emerge from the case studies that help to explain why, in those cases, the ads came to be shown in these media. These included:

- In some cases, misclassification of the nature of content of the advertised app seemed to be a factor in the ad having appeared, because it meant it was not picked up by the publisher's ad quality processes. It was not clear whether that misclassification was caused by the advertiser, intermediary or both parties.
- Knowledge of the UK advertising standards appeared to be variable. Some parties, including advertisers, publishers and intermediaries, did not have sufficient understanding of the rules and guidelines. This may have contributed to some of the ads appearing, although no parties in the case studies sought to argue that the ads complied with their own existing ad policies, or the standards required by others involved in the ad being served.
- Ads for certain types of apps which are available on the app stores may - by reflecting the sexual nature of the apps - be at particular risk of breaching the rules around offence and harm, particularly romance stories or AI chat apps (which may or may not be classed as games) which allow sexual content. The ASA does not regulate the advertised apps themselves. However, regardless of the nature of the content of the advertised apps and whether the ads accurately reflected it, the ads for those apps must comply with the UK Advertising Code.

## Next steps

- In light of our findings, the ASA's sister body the Committee of Advertising Practice has produced specific guidance for in-app ads. We will look to build on the positive engagement with the mobile gaming app industry, begun through ASA rulings and expanded on through this study, to develop its efforts to help uphold the advertising rules.
- While engagement with individual app developers can present challenges, as seen by a small number who did not respond to us, we will seek to continue to work with intermediaries and other key players in the sector to further address this issue.
- Through our monitoring we were able to identify, with relative ease, a number of non-compliant in-app ads. In light of that, we encourage intermediaries and publishers to consider whether there are additional steps they could take to detect and remove such ads from their platforms and apps.
- This report contributes to the ASA's ongoing initiatives around transparency and accountability in online advertising. It may be used to support wider discussion with the industry, regulators and other interested parties to help develop regulatory policy and practice in this important area of our work. By producing such reports the ASA seeks to better inform debate about the effectiveness and the proportionality of the rules that restrict ads likely to seriously offend their audience or risk causing them harm.

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