

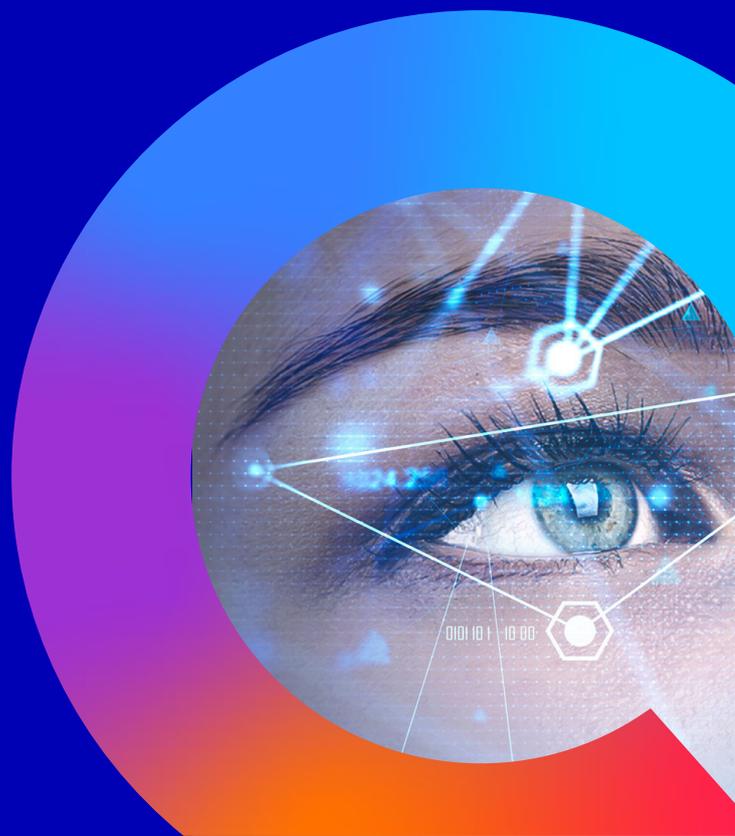
**eaqa**

EUROPEAN ASSOCIATION OF  
COMMUNICATIONS AGENCIES

# AI ETHICS

## *GUIDANCE FOR COMMUNICATIONS AGENCIES*

December 2025





## I. Introduction

### AI Ethics Guidance for Communications Agencies

#### The rise of artificial intelligence in the communications industry

The application of artificial intelligence (AI) has ushered in a new era for the advertising and communications industry. Generative AI tools – such as text, image, and video creation models – enable the generation of campaign concepts, the production of visual content, and the development of more targeted, predictive communication strategies.

However, this technological evolution brings not only opportunities but also significant responsibilities. The origin of creative content, the role of human oversight, the protection of personal data, and the prevention of social bias and exclusion are all critical challenges that must be addressed to maintain long-term consumer trust.

#### Why Ethical Guidance Is Needed

For AI to truly create value in the communications sector, its use must be grounded in strong ethical frameworks. International and European-level guidelines – such as those developed by the ICC, WFA, IPA/ISBA, ACC/UBA, and FEDMA/BAM – consistently emphasize the following principles:

- The preservation and primacy of human creativity, supervision, and responsibility,
- Transparent labelling of AI-generated content (e.g. “Ad created with AI assistance”), only when it materially influences audience perception (*Clarification – 3. Contextual relevance required*),
- Full compliance with applicable laws and data protection standards, including intellectual property, consumer protection, and cross-border data flows (*Clarification – 4. Expanded legal reference*),
- Detection and mitigation of algorithmic bias through output-level assessments (*Clarification – 5. Focus on output not training data*),
- The protection of vulnerable groups,
- A focus on workforce upskilling, AI capability-building, and informed communication with clients (*Clarification – 8. Skills & client engagement*).

The aim of these ethical frameworks is not to hinder innovation, but to ensure that AI is used in a socially responsible and human-centric manner across the industry.



# EACA's AI Ethics Guidance for Communications Agencies

## The Role of EACA in Building a Responsible Communications Ecosystem

As the representative body of European communications agencies, the EACA is committed to supporting its members in the ethical, sustainable, and lawful integration of AI. Its goal is to build an ecosystem where technological advancement supports – rather than undermines – creativity.

To this end, EACA:

- Collects and disseminates best practices and self-regulatory models,
- Establishes professional minimum standards for the use of AI in communications,
- Promotes industry education and awareness on AI-related ethical challenges,
- And plays an active role in shaping European policy dialogues.
- **Encourages fair contract terms between agencies and clients regarding liability, risk-sharing, and the choice of AI tools** (*Addition – 2. Shared responsibility*).

This guidance aims to support communications agencies with clear principles and practical examples for applying AI responsibly and in line with shared ethical values.

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## II. Comparative Overview of International and National Guidelines

### Core principles of global and European self-regulatory frameworks for the ethical use of AI in advertising

For today's communications agencies, it is essential to approach AI deployment with transparency, accountability, and critical self-awareness. The following national and international guidelines offer practical foundations, all grounded in shared values: human responsibility, transparency, data protection, and social fairness.

#### 1. ACC & UBA (Belgium): 10 Principles for Ethical AI Use in Advertising

The Belgian ACC and UBA co-developed one of the region's first comprehensive AI ethics guidelines for advertising. Their 10-point framework emphasizes:

- AI should support – not replace – human creativity.
- AI-generated content should be clearly labeled if it could mislead consumers (e.g., “created with AI assistance”).
- Detecting algorithmic bias and ensuring inclusive content are key expectations.
- All communication must remain legal, decent, honest, and socially responsible.



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The primary aim of these principles is to uphold consumer trust while embracing innovation.

### 2. IPA & ISBA (UK): 12 Guidelines on Generative AI in Advertising

The UK's leading industry bodies – IPA and ISBA – released 12 ethical principles tailored to generative AI use. These highlight:

- The necessity of human oversight, editing, and final approval of AI-generated content.
- Transparent labeling if AI meaningfully impacts how the content is perceived.
- A focus on augmentation rather than replacement: AI should extend creative capabilities, not displace talent.

### 3. ICC Code: International Self-Regulation Framework with AI-Specific Updates

The International Chamber of Commerce (ICC) updated its Advertising and Marketing Communications Code in 2024 to address AI use. The code:

- Acknowledges the growing role of AI and algorithms in creating and distributing advertisements.
- Adds new provisions addressing responsibility, human oversight, and data integrity.
- Reinforces that AI use must remain compliant with national laws and international advertising standards.

As one of the pillars of global advertising ethics, the ICC Code serves as a foundational reference for all agencies.

### 4. FEDMA & BAM: Charter for Ethical AI-Driven Marketing

The European Federation of Direct and Interactive Marketing (FEDMA) and Belgium's BAM jointly developed an AI ethics charter for marketing. It:

- Emphasizes responsible handling of data-driven decisions.
- Addresses ethical considerations of data processing, consent, and profiling.
- Advocates for unified European standards in AI-driven marketing practices.

The charter's core mission is to safeguard consumer data and ensure transparency in the digital marketing environment.



## 5. Digital Marketing Institute: Practical Strategies for Ethical Digital AI Use

Rather than a formal code, the Digital Marketing Institute (DMI) offers a practical guidance document aimed at fostering:

- Deeper understanding of AI's ethical implications.
- Critical thinking skills among professionals working with AI tools.
- Competence in collaborating with AI as a co-creator.

DMI encourages marketing professionals to treat AI not just as a tool, but as a partner in ethical, human-centered innovation.

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## III. EACA guidelines for the ethical use of artificial intelligence in the advertising and communications industry

The rapid proliferation of AI technologies and the accelerated development of generative AI tools are transforming the advertising and communications industry. Alongside unprecedented opportunities, these innovations raise significant ethical, legal, and societal challenges that require responsible and forward-looking responses from the sector.

**To respond to these emerging challenges and shape responsible industry standards, the European Association of Communications Agencies (EACA) sets out the following comprehensive recommendations to promote value-driven and sustainable AI use among its members.**

### Core Principles

#### 1. Human Oversight and Accountability

Ethical and legal responsibility must always remain with a human agent. AI systems must not, by default, function as autonomous decision-makers. Humans retain the authority to define objectives, validate outcomes, and assume accountability for any AI-driven action or recommendation.

Oversight mechanisms should be appropriate to the context and scale of AI deployment. These may include periodic reviews, escalation procedures, governance frameworks, or audit processes that ensure transparency and control without unnecessarily constraining automation.

In contexts such as programmatic advertising or large-scale personalization, where AI systems autonomously optimize within predefined parameters, human oversight may take the form of agreed-upon validation mechanisms. Mutual agreements between the agency and client may define these mechanisms, provided that ethical and legal accountability



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ultimately remains with human decision-makers. (*Clarification – Scope of final decision and oversight mechanisms*)

## 2. Transparency and Content Labelling

Clear labelling of AI-assisted content remains essential for maintaining consumer trust and industry credibility. Disclosure is required when AI involvement could reasonably affect - or mislead - the audience's perception of authenticity or reality.

Agencies should apply professional judgement, guided by context, platform, and audience expectations, to determine when disclosure is genuinely relevant and necessary. (*Clarification – Contextual use and threshold for disclosure*)

## 3. Data Protection and Legal Compliance

All AI applications must comply with the GDPR and other relevant legal frameworks, including intellectual property law, consumer protection law, and jurisdictional rules for international data transfers. Depending on the context and the type of data, lawful data processing may be based on consent, contractual necessity, or legitimate interest. When selecting tools, agencies are encouraged to consider potential risks – particularly when using APIs or services hosted outside the EU. (*Clarification – 4. Expanded and refined legal framing*)

## 4. Fairness, Diversity, and Inclusion

Agencies are not expected to control the internal workings of third-party AI models but are responsible for reviewing and adjusting final outputs. Unintended Bias should be assessed at the content level, ensuring inclusive representation and avoiding discriminatory or exclusionary messaging. Communications should reflect inclusive narratives that respect social diversity across gender, ethnicity, age, and beyond.

## 5. Protection of Vulnerable Groups

AI must not be used in ways that exploit the emotional or cognitive vulnerability of children, the elderly, or any other at-risk population.

In sensitive areas such as health, finance, or child-focused marketing, agencies and clients are encouraged to jointly define clear boundaries for the responsible use of AI, ensuring alignment with ethical and sector-specific standards. (*Clarification – 6. Shared ethical limits*)

## 6. AI Integration and Creative Work

AI can enhance, not limit, human creativity. A culture of reskilling, mentoring, and thoughtful AI integration should be encouraged – never mandated. (*Clarification – 6. Reframing job protection principle*)

## 7. Environmental Sustainability

Agencies are encouraged to reflect on the environmental impact of AI tools and, where feasible, prioritise more sustainable alternatives. While efforts to reduce the digital



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footprint are welcome, primary responsibility for energy transparency rests with AI vendors. Nonetheless, agencies are advised to request relevant data when available, supporting more informed and responsible choices. (Clarification – 7. Realistic and flexible)

### 8. AI Literacy and Education

Agencies are encouraged to ensure that team members using AI tools have the appropriate skills, legal understanding, and ethical awareness. Internal expertise should go hand in hand with the ability to clearly communicate AI's role, impact, and limitations to clients – fostering trust, transparency, and shared accountability.

#### Recommended Practical Actions

**Develop internal AI use policies:** Each agency should adopt internal guidelines to govern the ethical development and deployment of AI tools.

**Introduce regular ethical audits:** Implement systems to detect and address AI biases (e.g. capAI, IBM AI Fairness Toolkit).

**Establish clear labelling standards:** Apply labelling only where AI involvement meets the disclosure criteria defined under Principle 2.

**Set up feedback and redress mechanisms:** Enable consumer and partner feedback on AI-generated content and integrate it into operations.

**Update contracts and risk frameworks:** Define agency-client responsibility sharing, AI tool approval protocols, and liability terms. (*Addition – 2. Contractual risk-sharing*)

**Encourage vendor accountability:** Request transparency from AI providers regarding energy usage and model provenance. (*Addition – 7. Sustainability accountability*)

**Promote shared governance:** Embed AI oversight into governance processes with regular reviews, escalation points, and documented accountability. (*Clarification – 1. Oversight models*)

**Integrate reskilling models:** Where applicable, „co“-invest in staff development programs with „industry“ partners. (*Clarification – 6. Voluntary upskilling*)

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*All modifications above reflect consolidated feedback from national associations and experts, and are intended to strengthen clarity, realism, and operational relevance without altering the core ethical objectives of the EACA guidelines.*