

GTA POLICY

GTA National Social Media Influencer Policy

POLICY TITLE:	<i>GTA National Social Media Influencer Policy</i>
POLICY OWNER:	GTA Board
APPLIES TO:	All GTA Members
APPROVED BY:	GTA Board
APPROVAL DATE:	27 July 2026
EFFECTIVE DATE:	31 July 2026
REVIEW CYCLE:	Every two years, or earlier if required by regulation or industry practice changes.
NEXT REVIEW:	31 July 2028
VERSION:	Final
DOCUMENT OWNER:	Daniel Maloney GM Policy Strategy Engagement GTA
POLICY SUMMARY:	This Policy does not permit GTA Members to post, repost, share, “like” or approve with words or emojis, paid or unpaid Social Media Influencer Content (as defined in this Policy) that is directed at EGM players in Australia, that may promote an EGM, or the benefits of playing an EGM.

GTA National Social Media Influencer Policy

Contents

1. Definitions	3
2. Policy Rationale	4
3. Policy Summary	4
4. Policy Application	4
5. Policy Prohibitions	5
8. Policy Compliance	5
9. Policy Review Cycle.....	6
10. Policy Related Documents & Resources	6
Appendix One: Laws by Jurisdiction	7

1. Definitions

GTA Member:	For the purposes of this Policy, the definition of a GTA Member only applies to the Australian Operations of a GTA Member Company, and the GTA Member Employees, Officers, Agents, Associates, and Contractors working within the GTA Member Company's Australian operations.
Social Media Influencer:	For the purposes of this Policy, a Social Media Influencer is defined as a social media content creator whose posts shape perceptions, attitudes, and behaviours towards electronic gaming machine (EGM) players in Australia. This includes individuals whose content may inadvertently act as advertising for EGMs even when the content is presented as personal commentary or entertainment. <i>*Note: This definition does not include Social Media Influencers whose Social Media Influencer Content is directed at international venues or players, where EGM Social Media Content is legally permitted.</i>
Social Media Influencer Content:	For the purposes of this Policy, Social Media Influencer Content is defined as social media content created by a Social Media Influencer (as defined in this Policy) that is directed at EGM players in Australia, that may include, but is not limited to EGM images, symbols, sounds, reels, animations, game play, game features, game themes, or stories or captions that promote an EGM or the benefits of playing an EGM.
Social Media Accounts:	Examples of Social Media Accounts without limitation: <i>Instagram, LinkedIn, Reddit, TruthSocial, TikTok, YouTube, and X.</i>

2. Policy Rationale

- A. Australian laws restrict advertising for electronic gaming machines (EGMs). Those rules apply to manufacturers as well as venues. **Note - Appendix One: Laws by Jurisdiction* in this Policy.
- B. The *GTA National Social Media Influencer Policy* (this Policy) provides GTA Members with a simple, consistent standard when using social media.
- C. This Policy is designed to reduce legal risk, protect vulnerable people, and to support measures directed at minimising gambling harm across Australia.
- D. This Policy also addresses the concerns of Regulators who have made it clear that EGM businesses in Australia may be responsible for promotions connected to their brands, even when the content is posted by a third party unconnected to them, such as a Social Media Influencer.

3. Policy Summary

- A. This Policy does not permit GTA Members to post, repost, share, “like” or approve with words or emojis, paid or unpaid Social Media Influencer Content (as defined in this Policy) that is directed at EGM players in Australia, and that may promote an EGM, or the benefits of playing an EGM.

4. Policy Application

- A. This Policy only applies to Social Media Influencer Content (as defined in this Policy) directed at EGM players in Australia, the official social media accounts of the Australian Operations of a GTA Member Company, and the official social media accounts of GTA Member Company Employees, Officers, Agents, Associates, and Contractors, (employees and contractors) working within the Australian operations of the GTA Member Company.

5. Policy Prohibitions

A. This Policy does *not* permit GTA Members to:

1. Post, repost, share, “like” or approve with words or emojis, paid or unpaid Social Media Influencer Content (as defined in this Policy) directed at EGM players in Australia, that may promote an EGM, or the benefits of playing an EGM.
2. Provide incentives for Social Media Influencer Content (as defined in this Policy) directed toward EGM players in Australia, through the provision of paid or complimentary access to demonstration machines, free credits, food and beverage hospitality, or any other benefit connected to Social Media Influencer Content (as defined in this Policy).
3. Promote EGMs and gameplay content through the posting, reposting, sharing, “liking” or approving with words or emojis, paid or unpaid Social Media Influencer Content (as defined in this Policy) directed toward EGM players in Australia, such as, but not limited to, game play, game demonstrations, animated previews, feature explanations, bonus rounds, jackpot mechanics, volatility, hit frequency, return-to-player information, or similar performance information.
4. Promote EGMs being displayed and demonstrated at trade shows, expos, or customer events, through the posting, reposting, sharing, “liking” or approving with words or emojis, paid or unpaid Social Media Influencer Content (as defined in this Policy), directed toward EGM players in Australia, that may promote an EGM, or the benefits of playing an EGM.

6. Policy Compliance

A. Each GTA Member is responsible for their own compliance.

B. GTA Members should:

1. Train relevant staff and agencies on this policy.
2. Monitor the official social media accounts within their control.

3. Remove or correct non-compliant content from social media accounts within the control of the GTA Member.
4. Keep records of approvals for higher-risk posts.
5. Give the GTA information reasonably needed to confirm compliance.
6. If a GTA Member becomes aware of a possible breach by itself, or another member, it should promptly:
 - a. Notify the GTA
 - b. Take reasonable steps to fix the issue and prevent it happening again.
 - c. Report the matter to the GTA Board under any Board reporting protocol.
 - d. Notify the relevant regulator where legally required.
7. The GTA Board may request compliance information from GTA Members at any time.
8. Serious or repeated compliance breaches from GTA Members may be dealt with under the GTA constitution and Membership rules.

7. Policy Review Cycle

- A. The GTA Board will review this policy at least every two years, and earlier if the law, regulatory guidance, or industry practice, requires any alteration to this review cycle.

8. Policy Related Documents & Resources

- A. This Policy should be read in conjunction with the following:
 - ❖ The *GTA Member Code of Ethics*
 - ❖ The *Australian Association of National Advertisers (AANA) Wagering Advertising and Marketing Code*.
 - ❖ *Liquor & Gaming NSW — Guidelines for the Publication of Gambling Advertising*.
 - ❖ *VGCCC Guidance on Gaming Machine Advertising Requirements*
 - ❖ *Queensland OLGR — Legal Requirements for Gambling Advertising and Promotions*.
 - ❖ *National Consumer Protection Framework for Online Wagering*
 - ❖ *Interactive Gambling Act 2001 (Cth)* and associated ACMA Guidance
 - ❖ Applicable State and Territory gaming machine legislation – see Appendix One.

APPENDIX ONE: LAWS BY JURISDICTION

JURISDICTION	PRINCIPAL LEGISLATION	KEY PROVISION / NOTE FOR MANUFACTURERS
NEW SOUTH WALES (NSW)	<i>Gaming Machines Act 2001 (NSW)</i> , s 43(1); <i>Gaming Machines Regulation 2019 (NSW)</i> ; <i>Betting and Racing Act 1998 (NSW)</i>	Broad prohibition on any EGM advertising. The prohibition is not limited to venue operators — it applies to "a person." L&GNSW actively monitors social media. Penalties: \$11,000 (Individual), \$110,000 (Corporation). Trade journal and convention exceptions apply (s 41).
VICTORIA (VIC)	<i>Gambling Regulation Act 2003 (VIC)</i> , s 3.5.34AA; VGCCC Guidance on Gaming Machine Advertising	Prohibition on publishing EGM advertising outside the gaming machine area. VGCCC has confirmed the prohibition applies to websites and social media. Manufacturers supplying approved venues must ensure their own promotional activity does not breach the Act. Penalty: Circa \$23,077.
QUEENSLAND (QLD)	<i>Gaming Machine Act 1991 (Qld)</i> ; <i>Responsible Gambling Code of Practice (QLD)</i>	Restrictions on gaming machine advertising; OLGR monitors venue and supplier social media. Manufacturers operating in Queensland must comply with advertising obligations under the Act and the Code of Practice. Penalty: Up to \$33,380.
SOUTH AUSTRALIA (SA)	<i>Gaming Machines Act 1992 (SA)</i>	Advertising restrictions consistent with national harm minimisation framework. Manufacturer conduct in SA is subject to licence and approval conditions.
WESTERN AUSTRALIA (WA)	<i>Gaming and Wagering Commission Act 1987 (WA)</i>	EGMs are prohibited in hotels and clubs in WA. Only Crown Perth operates EGMs. Manufacturer activities in WA are subject to specific casino supply arrangements and Commission oversight.
TASMANIA (TAS)	<i>Gaming Control Act 1993 (TAS)</i>	Advertising subject to licence and approval conditions. Manufacturer promotional activity must comply with Tasmanian regulatory requirements.
AUSTRALIAN CAPITAL TERRITORY (ACT)	<i>Gambling and Racing Control Act 1999 (ACT)</i> ; <i>ACT Gambling and Racing Control (Code of Practice) Regulation 2002</i>	Mandatory Code of Practice applies across all gambling providers including suppliers. Advertising restrictions extend to manufacturer-level promotional activity.