



EUROPEAN COMMISSION  
Directorate-General Justice and Consumers  
Directorate Rule of Law, Fundamental Rights and Democracy

***INFORMAL COMMISSION EXPERT GROUP***  
***EXPERT GROUP OF PROVIDERS OF POLITICAL ADVERTISING SERVICES***  
**TERMS OF REFERENCE**

## **1. BACKGROUND**

The preparation, placement, promotion, publication, delivery and dissemination of political advertisements can involve a complex chain of providers of political advertising services. A large, diversified and increasing number of services are associated with political advertising, such as political consultancies, advertising agencies, ‘ad-tech’ platforms, public relations firms, influencers and various data analytics and brokerage operators. Political advertising can take many forms, including paid content, sponsored search results, paid targeted messages, promotion in rankings, promotion of something or someone integrated into content, such as product placement, influencers and other endorsements.

Political advertising can be disseminated or published through various means and media across borders both online and offline. It is rapidly increasing and can be disseminated or published via traditional offline media, such as newspapers, television and radio, but also increasingly via online platforms, websites, mobile applications, computer games and other digital interfaces.

Regulation (EU) 2024/900 on the transparency and targeting of political advertising<sup>1</sup>, which entered into full application as of 10 October 2025, provides, *inter alia*, EU common standards in the internal market for political advertising services.

Where a political advertising service is provided, several different obligations may apply to different providers throughout the value chain, including:

- establishing, based on a declaration from the sponsor, whether the advertising service is political;
- ensuring compliant contractual arrangements;
- record-keeping and transmitting relevant information to political advertising publishers;
- labelling of political ads and providing transparency notices;
- making online political advertisements available in the European repository;

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<sup>1</sup> Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising, OJ L, 2024/900, 20.3.2024.

- including periodic reporting on political advertising in annual financial statements;
- providing mechanisms to enable individuals to flag potentially non-compliant advertisements;
- transmitting information to national competent authorities or to interested entities (i.e. vetted academic researchers, members of civil society organisations, political actors, electoral observers or journalists).

The Commission committed to closely monitoring and supporting the application of Regulation (EU) 2024/900<sup>2</sup>. This includes collaborating with the industry to encourage the drawing up of voluntary codes of conduct and promote best practices and industry standards (particularly for the automated transmission of information to the publishers of political advertisements or for the labelling and transparency requirements for political advertisements).

In light of the above, the Commission’s Directorate-General Justice and Consumers (‘DG JUST’) has taken the initiative to establish the ‘EU platform of providers of political advertising services’ as an informal Commission expert group. This group shall support the Commission in monitoring and supporting the Political advertising Regulation’s application. It is expected to operate for a 4-year period, which could be renewed if needed.

## **2. SUBJECT MATTER**

The group of experts ‘Expert group of providers of political advertising services’ is set up.

## **3. TASKS**

The group’s tasks shall be

- (a) To provide to the Commission advice and expertise and other input including based on their interactions with others stakeholders such as sponsors, in relation to the implementation of Regulation (EU) 2024/900;
- (b) To contribute to the sharing of experience and good practice in the field of transparency and targeting of political advertising.

Exchanges will also build among others on the input from the Network of contact points for the implementation of Regulation (EU) 2024/900 and the European Cooperation Network on Elections.

## **4. MEMBERSHIP**

1. The group shall be composed of around 30 members.
2. Members shall be organisations with knowledge and experience on the topics referred to under point 1, in particular economic operators which are providers of political advertising services, including publishers, and associations representing them.

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<sup>2</sup> Regulation (EU) 2024/900 of the European Parliament and of the Council of 13 March 2024 on the transparency and targeting of political advertising, OJ L, 2024/900, 20.3.2024.

3. Organisations shall nominate their representatives and shall be responsible for ensuring that their representatives provide a high level of expertise. DG JUST may refuse the nomination by an organisation of a representative if it considers this nomination inappropriate in the light of the requirements specified in the call for applications. In such case, the organisation concerned shall be asked to appoint another representative.
4. Members who are no longer capable of contributing effectively to the expert group's deliberations, who, in the opinion of DG JUST, do not comply with the conditions set out in Article 339 of the Treaty on the Functioning of the European Union or who resign, shall no longer be invited to participate in any meetings of the group and may be replaced for the remainder of their term of office.

## **5. SELECTION PROCESS**

1. The selection of the group's members shall be carried out via a public call for applications, to be published on the Register of Commission expert groups and other similar entities ('the Register of expert groups'). In addition, the call for applications may be published through other means, including on dedicated websites. The call for applications shall clearly outline the selection criteria, including the required expertise and the interests to be represented in relation to the work to be performed. The minimum deadline for applications shall be four weeks.
2. In order to ensure continuity and the smooth functioning of the group, DG JUST shall establish a reserve list of suitable candidates that may be used to appoint replacements. DG JUST shall ask applicants for their consent before including their names on the reserve list.
3. Registration in the Transparency Register is required in order for organisations to be appointed.
4. The members of the group shall be appointed by the Director-General of DG JUST from applicants with competence in the areas referred to in points 1 and 3 and who have responded to the call for applications.
5. Members shall be appointed for 4 years. They shall remain in office until the end of their term of office or until replaced. Their term of office may be renewed.

## **6. CHAIR**

The group shall be chaired by a representative of DG JUST.

## **7. OPERATION**

1. The group shall act at the request of DG JUST, in compliance with the horizontal rules<sup>3</sup>.
2. Meetings of the group shall, in principle, be held on Commission premises or virtually, depending on the circumstances.

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<sup>3</sup> C(2016) 3301, Article 13.1.

3. DG JUST shall provide secretarial services. Commission officials from other departments with an interest in the proceedings may attend meetings of the group and of the sub-groups.
4. In agreement with DG JUST, the group may, by simple majority of its members, decide that deliberations shall be public.
5. Minutes on the discussion on each point on the agenda and on the opinions delivered by the group shall be meaningful and complete. Minutes shall be drafted by the secretariat under the responsibility of the Chair.
6. The group shall adopt its opinions, recommendations or reports by consensus.

## **8. SUB-GROUPS**

1. DG JUST may set up sub-groups for the purpose of examining specific questions on the basis of terms of reference defined by DG JUST. Sub-groups shall operate in compliance with the horizontal rules and shall report to the group. They shall be dissolved as soon as their mandate is fulfilled.
2. The members of sub-groups that are not members of the group shall be selected via a public call for applications, in compliance with point 6 and the horizontal rules<sup>4</sup>.

## **9. INVITED EXPERTS**

DG JUST may invite experts with specific expertise with respect to a subject matter on the agenda to take part in the work of the group or sub-groups on an *ad hoc* basis.

## **10. OBSERVERS**

1. Individuals and organisations may be granted an observer status, in compliance with the horizontal rules, by direct invitation.
2. Organisations appointed as observers shall nominate their representatives.
3. Observers and observers' representatives may be permitted by the Chair to take part in the discussions of the group and sub-groups and provide expertise. However, they shall not participate in the formulation of recommendations or advice of the group and sub-groups.

## **11. RULES OF PROCEDURE**

On a proposal by and in agreement with DG JUST the group shall adopt its rules of procedure by simple majority of its members, on the basis of the standard rules of procedure for expert groups, in compliance with the horizontal rules<sup>5</sup>. Sub-groups shall operate in compliance with the group's rules of procedure.

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<sup>4</sup> C(2016), Articles 10 and 14.2.

<sup>5</sup> See Article 17 of the horizontal rules.

## **12. PROFESSIONAL SECRECY AND HANDLING OF CLASSIFIED INFORMATION**

The members of the group and their representatives, as well as invited experts and observers, are subject to the obligation of professional secrecy, which by virtue of the Treaties and the rules implementing them applies to all members of the institutions and their staff, as well as to the Commission's rules on security regarding the protection of Union classified information, laid down in Commission Decisions (EU, Euratom) 2015/443<sup>6</sup> and 2015/444<sup>7</sup>. Should they fail to respect these obligations, the Commission may take all appropriate measures.

## **13. TRANSPARENCY**

1. The group and sub-groups shall be registered in the Register of Commission expert groups and other similar entities ('the Register of expert groups').
2. As regards the group and sub-groups composition, the following data shall be published on the Register of expert groups:
  - (a) the name of member organisations; the interest represented shall be disclosed;
  - (b) the name of observers.
3. All relevant documents, including the agendas, the minutes and the participants' submissions, shall be made available on the Register of expert groups. Access to dedicated websites shall not be submitted to user registration or any other restriction. In particular, DG JUST shall publish the agenda and other relevant background documents in due time ahead of the meeting, followed by timely publication of minutes. Exceptions to publication shall only be possible where it is deemed that disclosure of a document would undermine the protection of a public or private interest as defined in Article 4 of Regulation (EC) N° 1049/2001<sup>8</sup>.

## **14. MEETING EXPENSES**

1. Participants in the activities of the group and sub-groups shall not be remunerated for the services they offer.
2. Travel and subsistence expenses incurred by participants in the activities of the group and sub-groups shall be reimbursed by the Commission. Reimbursement shall be made in accordance with the provisions in force within the Commission and within the limits of the available appropriations allocated to the Commission departments under the annual procedure for the allocation of resources.

Done in Brussels, on 3 November 2025.

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<sup>6</sup> Commission Decision (EU, Euratom) 2015/443 of 13 March 2015 on Security in the Commission (OJ L 72, 17.3.2015, p. 41).

<sup>7</sup> Commission Decision (EU, Euratom) 2015/444 of 13 March 2015 on the security rules for protecting EU classified information (OJ L 72, 17.3.2015, p. 53).

<sup>8</sup> These exceptions are intended to protect public security, military affairs, international relations, financial, monetary or economic policy, privacy and integrity of the individual, commercial interests, court proceedings and legal advice, inspections/investigations/audits and the institution's decision-making process.