

PANORAMIC

**ADVERTISING &  
MARKETING**

Armenia



LEXOLOGY

# Advertising & Marketing

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# Contents

## Advertising & Marketing

### LEGISLATION AND REGULATION

- Legal framework
- Regulators
- Regulators' powers
- Regulators' priorities
- Industry codes
- Authorisation
- Clearance

### PRIVATE ENFORCEMENT (LITIGATION AND ADMINISTRATIVE PROCEDURES)

- Challenging competitors' advertising
- Public challenges
- Burden of proof
- Remedies
- Length of proceedings
- Cost of proceedings
- Appeals

### MISLEADING ADVERTISING

- Editorial and advertising
- Advertising that requires substantiation
- Rules on misleading advertising
- Substantiating advertising claims
- Survey results
- Comparisons with competitors
- Test and study results
- Demonstrating performance
- Third-party endorsements
- Guarantees
- Environmental impact
- Free and special price claims
- New and improved
- Claims of origin

### PROHIBITED AND CONTROLLED ADVERTISING

- Prohibited products and services
- Prohibited advertising methods
- Protection of minors
- Credit and financial products
- Therapeutic goods and services

Food and health  
Alcohol  
Tobacco  
Gambling  
Lotteries  
Promotional contests  
Indirect marketing  
Other advertising rules

## **SOCIAL MEDIA**

Regulation

## **UPDATE AND TRENDS**

Recent developments

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## LEGISLATION AND REGULATION

### Legal framework

#### What are the principal statutes regulating advertising generally?

In Armenia, advertising is primarily regulated by the Law of the Republic of Armenia (RA) On Advertising, which provides the main rules and standards applicable to advertising.

Separate regulations governing the advertising are also provided for by the RA Civil Code, RA laws On Audiovisual Media, On Protection of Consumer Rights, On Protection of Economic Competition and Consumer Interests, On Protection of Personal Data and other sector-specific laws.

Law stated - 30 April 2026

### Regulators

#### Which bodies are primarily responsible for issuing advertising regulations and enforcing rules on advertising? How is the issue of concurrent jurisdiction among regulators with responsibility for advertising handled?

The oversight and enforcement of advertising laws are distributed among specific government bodies based on the advertisement's type, content and location. Below is a breakdown of the key regulatory bodies and their specific areas of oversight:

- Mayor of Yerevan & Regional Governors: Standard outdoor ads;
- Ministry of Territorial Admin & Infrastructure: Ads on highways;
- Ministry of Education, Science, Culture & Sports: Social/public service ads;
- TV and Radio Commission: Broadcast ads;
- Health and Labour Inspection: Regulated sectors such as medicine, healthcare, infant formula, organ/tissue donation; and
- State Revenue Committee: Online gambling/lottery ads.

For certain advertisements, obtaining permission from the authorised body is mandatory, for instance:

- Veterinary vaccines, serums and diagnostic tools: Ministry of Economy;
- Medicines, medical products and treatment methods: Ministry of Health;
- Gaming activities: Ministry of Economy; and
- Outdoor advertising: Local self-government bodies.

The Commission for the Protection of Competition and Consumer Interests (the Commission) carries out supervision across all sectors from the perspective of competition law, as its primary objective is to ensure fair market competition and protect consumer

interests. With regard to the other regulators, because regulatory powers are distinctly delineated, the issue of concurrent jurisdiction or overlapping authority does not arise.

**Law stated - 30 April 2026**

### **Regulators' powers**

#### **What powers do the regulators have?**

Sector-specific regulators oversee general compliance, holding the power to issue warnings, ban unfair advertisements, issue notices to cease violations of legislation, mandate counter-advertising, impose administrative fines, file claims against the violators, in cases of repeated violations of rules on advertising submit the claims with proposal on liquidation.

The Commission oversees advertising to prevent unfair competition and protect consumer interests. It can conduct investigations, which include inspections, test purchases, general and external observations, continuous monitoring and sector-specific studies. The Commission can issue warnings, require the violation to be corrected within a set period and to be avoided in the future or impose fines.

**Law stated - 30 April 2026**

### **Regulators' priorities**

#### **What are the current major concerns of regulators?**

The regulators are currently focusing on two fronts: amending existing legislation and inspecting advertising compliance regarding permissions and rules.

There are two major legislative changes underway. As at April 2026, the first package has passed its first hearing in the National Assembly of Armenia. Through this legislation, regulators aim to clarify the definitions of misleading advertising and establish rules for permissible comparative advertising. The second package of amendments, currently in the public discussion stage as of April 2026, intends to prohibit online targeting of users within Armenia or the display of prohibited content, including via international advertising platforms.

Periodic inspections of advertising reveal a high rate of non-compliance, resulting in numerous penalties.

**Law stated - 30 April 2026**

### **Industry codes**

#### **Give brief details of any issued industry codes of practice. What are the consequences for non-compliance?**

Currently, Armenia does not have specific industry codes of practice exclusively dedicated to the advertising sector. The closest equivalent is the Code of Ethical Principles of Armenian

Media and Journalists, which explicitly prohibits the publication of materials containing hidden political advertising: however, this has little to do with primary advertising regulation.

**Law stated - 30 April 2026**

## **Authorisation**

### **Must advertisers register or obtain a licence?**

For certain advertising the regulatory permits are required. For instance, in the following cases:

- Health: Advertising medicines, medical products or treatments requires Ministry of Health authorisation; unregistered products or unlicensed/sensitive services (eg, surrogacy) are prohibited.
- Gambling: Advertising unlicensed gambling, lotteries, online games, casinos or totalisator is prohibited. The permission on advertising of gambling, online gambling, casino, lotteries (including totalisators) must be granted by the Ministry of Economy prior to commence any advertising.
- Finance: Financial organisations cannot advertise without a valid operational licence at the time of ordering or publishing the ad.
- Outdoor Advertising: Requirements for outdoor advertising are regulated by local self-governing bodies; advertisements cannot be displayed without their prior consent.

**Law stated - 30 April 2026**

## **Clearance**

### **May advertisers seek advisory opinions from the regulator? Must certain advertising receive clearance before publication or broadcast?**

According to the Law on "Competition and consumer interests protection" before executing actions, entities can apply to the Commission to ensure planned activities don't restrict competition or harm consumers.

As a general rule, businesses typically do not seek voluntary regulatory opinions, as there is often no formal requirement to do so and it is not a preferred informal practice. However, when prior permission is legally mandated, the specific content of the advertisement is thoroughly examined as part of the application process.

**Law stated - 30 April 2026**

## **PRIVATE ENFORCEMENT (LITIGATION AND ADMINISTRATIVE PROCEDURES)**

### **Challenging competitors' advertising**

## What avenues are available for competitors to challenge advertising? What are the advantages and disadvantages of the different avenues for challenging competitors' advertising?

Competitors may challenge advertising in the following manner.

The Law on Protection of Economic Competition and Consumer Interests defines the concept of unfair competition, including violations of advertising legislation (eg, confusion with another entity or improper comparisons through the advertising). Any person, including competitors, can report violations to the Commission, which alone can establish unfair competition fact. If the Commission confirms a violation, then competitors can file a civil claim for damages and the Commission's decision relieves the competitors of proving the advertising's illegality.

The disadvantage is that in practice the Commission often refuses to initiate proceedings regarding unfair competition, prompting competitors to approach the Administrative Court via an action performance claim. However, in such cases the court generally compels the Commission only to initiate proceedings.

In addition, the Law on Advertising defines the concept of unfair advertising. Before the active application of competition legislation and the Commission's involvement, previously it was more common to file a civil claim directly for unfair advertising, rather than first approaching the Commission.

The civil claim is the only way to receive compensation for damages from a competitor. However, disadvantages include the long duration of court proceedings, which can last several years, as well as legal costs (such as attorney fees)

**Law stated - 30 April 2026**

## Public challenges

### How may members of the public or consumer associations challenge advertising? Who has standing to bring a civil action or start a regulatory proceeding? On what grounds?

Currently, the main body responsible for consumer rights protection is the Commission. Consumers also can challenge advertising in the same way as competitors, first by submitting reports to the Commission, then by applying to the court. Until August 2025, the proceedings initiated by the Commission fell under the framework of unfair competition, while after the 2025 legislative amendments, they are considered under practices that violate consumer rights. This includes any form of advertising that is unfair or unlawful, failing to meet accuracy or appropriate standards.

Consumer associations in Armenia may challenge advertising by reporting to the Commission, or other regulatory bodies, or act as representatives of consumers when a group claim has been filed by consumers. They do not have the right to directly apply to the court for protecting consumer rights. The claims filed by them are rejected on the grounds of lack of legal interest.

**Law stated - 30 April 2026**

## **Burden of proof**

### **Which party bears the burden of proof?**

In unfair competition or consumer rights proceedings the Commission bears the burden of proving an advertising violation, unless evidence is only available from the person accused, in which case the burden shifts to them. Additionally, in proceedings initiated by the Commission, the burden of proving proof of the existence of mitigating circumstances, when determining the measure of liability, lies with the person.

If a person files a claim with the Administrative Court seeking to compel the Commission to initiate proceedings, the burden of proof lies with the Commission regarding the facts justifying the refusal to initiate the proceedings, and with the person regarding the facts favourable to them.

When a damages compensation claim is filed and relies on a Commission decision establishing the fact of the unlawful advertisement (unfair competition or practice violating consumer rights), the decision itself proves the illegality of advertisement, so the claimant must only prove the harm, its connection to the advertisement, and the damages amount.

If the advertiser claims that a violation of advertising legislation occurred due to the fault of the advertising producer or the advertising medium, the advertiser bears the burden of proving it.

**Law stated - 30 April 2026**

## **Remedies**

### **What remedies may the courts or other adjudicators grant?**

For unfair competition and advertisements violating consumer interests, the Commission may issue a warning, require the violation to be corrected within a set period and to be avoided in the future. The Commission may impose a fine of up to 5% of the economic entity's turnover for the year preceding the violation.

The Law on Advertising provides the following remedies through judicial proceedings: compensation for material damages, compensation for harm to a citizen's life, health or property, public refutation of the advertisement, as well as other remedies under civil law.

Sector-specific regulatory bodies may: (1) warn and prohibit unfair advertising; (2) notify the advertiser, producer and advertising medium to stop violations and implement counter-advertising; (3) file court claims against them for unfair advertising and, in repeated cases, seek their liquidation.

**Law stated - 30 April 2026**

## **Length of proceedings**

### **How long do proceedings normally take from start to conclusion?**

Proceedings in both administrative and civil courts typically last from two to three years, depending on the nature and complexity of the case, including review of the case in the Appeal and the Cassation courts.

In the matter of general rule the administrative proceedings initiated by an administrative body must be closed within 30 days. For the sector-specific proceedings the law may define the longer or shorter terms for proceedings. For instance, the grounds for initiating administrative proceedings are considered by the Commission within one month. Once initiated, the proceeding lasts three months and may be extended once for an additional three months. If the individual remedies the alleged violation and acknowledges the fact of the infringement, an accelerated proceeding may be applied, lasting one month.

**Law stated - 30 April 2026**

### **Cost of proceedings**

**How much do such proceedings typically cost? Are costs and legal fees recoverable?**

Judicial costs consist of the state fee and other case-related expenses (eg, translation, expert opinions, attorney (representative) fees, etc). For instance the state fee (first instance court) is 3% of the claim amount for monetary claims and 20,000 dram for non-monetary claims, and the state fee for filing an action performance claim to the administrative court (first instance) is 10,000 dram.

In general, court costs are recoverable if the claim is granted. In practice, the court orders recovery of the state fee, expert fees and translation costs in the amount proportionate to the granted claim. However, the attorney fees usually only partially recovered even if the claim is granted in full. When determining recoverable attorney (representative) fees, the court considers their reasonableness, taking into account the scope of work, complexity of the case, the average fee guidelines of the Chamber of Advocates of Armenia, and the proportionality between the claimed amount and the legal fees.

Procedures before the administrative bodies are not required the payment of state fee.

**Law stated - 30 April 2026**

### **Appeals**

**What appeals are available from the decision of a court or other adjudicating body?**

The decisions of the courts in both civil and administrative cases, may be appealed to the respective Appeal Court of Armenia, and the decisions of the Appeal Court may be appealed to the Cassation Court of Armenia.

Decisions of administrative bodies may be challenged either through administrative (hierarchical) or judicial review. Under administrative review, the decisions of the Commission and other sector-specific regulatory bodies (such as the Television and Radio Commission, local self-government bodies, the Health and Labor Inspectorate, etc) may be appealed directly to these bodies, as they do not have superior bodies.

Law stated - 30 April 2026

## MISLEADING ADVERTISING

### **Editorial and advertising**

#### **How is editorial content differentiated from advertising?**

According to the general principles, any practice that misleads or can mislead the average consumer is prohibited. Advertisements must be clearly identifiable to the consumer, otherwise it will be considered misleading. A particular manifestation of this is as follows: the Law on "Consumer protection" prohibits presenting editorial content through the media or by other means of communication for advertising purposes if the economic entity has paid for it, but this fact is not clearly identifiable to the consumer through visual or audio means.

Law stated - 30 April 2026

### **Advertising that requires substantiation**

#### **How does your law distinguish between "puffery" and advertising claims that require support?**

Under the Law on Advertising, generally, information provided by the advertiser must be accurate. An advertisement is considered misleading if it contains false or distorted information about the entity, its products/services or related aspects (origin, quality, quantity, price or consumer rights) and if it misleads or may mislead the average consumer. Although the legislation does not explicitly prohibit the use of "puffery" in advertising, such claims are still permitted and assessed from the perspective of whether they mislead or could mislead the average consumer.

Law stated - 30 April 2026

### **Rules on misleading advertising**

#### **What are the general rules regarding misleading advertising? Must all material information be disclosed? Are disclaimers and footnotes permissible?**

According to the Law on "Advertising", advertising must be legal, accurate and appropriate. The language of advertising is primarily Armenian. Foreign language advertising is allowed only in specific cases. Advertising that does not comply with legislation is considered unfair.

The Law on "Competition and Protection of Consumer Interests" defines the forms of conduct that violate consumer rights. These are, among others, the unfair advertising and misleading conduct established by the Law on "Protection of Consumer Rights". Misleading conduct may occur in two ways:

Active conduct - the advertisement contains false, inaccurate or distorted information, or information that is correct but may create a misleading impression about the economic entity, their activity or the offered product (work, service), including its advertising, distribution, sale, origin, production or usage conditions, purpose, suitability, shelf life, quality, quantity, terms of offer or provision, price or consumer rights, and may induce the consumer to make a decision they would not otherwise make.

Omission – the economic entity fails to provide necessary, clear, complete and timely information regarding the above aspects, which may mislead the consumer and induce an incorrect decision.

Under the general rule, the economic entity is obliged to provide the consumer in a timely manner with accurate and necessary information about products (works, services) to enable their proper choice. This means that advertising must include all information considered essential for the consumer to make an informed decision in the given situation, and the absence of such information must not mislead the consumer.

When advertising a product's price, the presentation must comply with the legally established rules for displaying prices.

Purchase invitations, as advertising, must indicate product/service details, total price, payment and delivery terms, complaint procedures, cancellation rights, e-commerce roles and ranking criteria, authenticity of user ratings and, for comparison services, the method, compared items and update rules, etc.

The use of disclaimers and footnotes is permitted provided they do not conceal essential information or mislead the average consumer or create the risk of doing so. In advertisements by financial organisations, footnotes or fine print must be presented in a sufficiently readable font size to ensure clarity, and a reference must be provided to the relevant source for accessing detailed information.

A draft amendment to the advertising legislation is currently under consideration, which specifies the criteria for determining whether advertising is misleading, including:

- Characteristics of goods or services, such as availability, nature, composition, method and date of production or supply, fitness for purpose, methods of use, quantity, technical features, country of origin, expected results and results of tests or inspections.
- Price or the method of price calculation, as well as the terms of supply of goods or provision of services.
- The advertiser's characteristics, including identity, assets, qualifications, intellectual or industrial property rights and awards.

According to the draft, the burden of proof for the accuracy of the information presented in advertising lies with the advertiser. The draft has been adopted by the National Assembly of Armenia at the first reading as of April 2026.

**Law stated - 30 April 2026**

## | Substantiating advertising claims

## Must an advertiser have proof of the claims it makes in advertising before publishing? Are there recognised standards for the type of proof necessary to substantiate claims?

Under the general principles of advertising law in Armenia, not all claims made in advertising are subject to substantiation. For example, puffery statements or evaluative judgments used in advertising cannot be verified with any proof. Nevertheless, all advertising is subject to assessment regarding its potential to mislead the average consumer.

At the same time, the legislation provides for specific types of proof for advertising certain products in defined sectors. In particular:

- In case of advertising medicines and other medical products advertising can be supported by a state registration certificate.
- In case of advertising entities dealing with medical products advertising can be supported by a valid licence confirming the entity's right to engage in such activities.
- In the case of advertising food products, advertisers should possess documentation substantiating the safety of the product, such as a state certificate.
- In case of advertising organic agricultural products, claims such as "organic," or equivalent terms such as "ecological," "environmentally clean," "biological," or abbreviations such as "Eco" or "bio" should be substantiated by a certificate confirming compliance with organic farming standards, or, for imported products, by documents confirming conformity with applicable organic agriculture regulations.
- In the case of claims regarding geographical indications or appellations of origin, can be substantiated by a certificate of the right of use, a single document containing the essential elements of the technical specifications, a declaration of origin, (or any relevant commercial or other document indicating the country or region of origin as declared by the producer, seller or consignor), and/or a certificate of origin issued by the competent authority or authorised organisation of the country of origin or export in accordance with applicable rules.

This list is not exhaustive, and the types of acceptable proof can vary depending on the nature of the claim and the relevant sector.

**Law stated - 30 April 2026**

## Survey results

### Are there specific requirements for advertising claims based on the results of surveys?

Armenian law sets no specific requirements for survey-based advertising claims, meaning that the general rule of accuracy prevails. Consequently, the advertiser must maintain documentation proving that the survey was conducted properly and that the supporting data is accurate, when using survey-based advertising claims.

**Law stated - 30 April 2026**

## Comparisons with competitors

### What are the rules for comparisons with competitors? Is it permissible to identify a competitor by name?

In Armenia, comparative advertising is generally permitted, including identifying a competitor by name, provided it complies with the principles of fair competition and is not misleading.

At the same time, the law prohibits advertising that:

- discredits competitors or their products;
- contains unnecessary or inappropriate comparisons; or
- makes inaccurate comparisons with the rights, position or products of competitors

Under the Law on "Protection of Economic Competition and Consumer Interests", comparison of own products with those of competitors may be considered unfair competition if done unnecessary, incorrect or improper manner.

A draft amendment to the advertising legislation is currently under consideration, which aims to regulate the permissible comparative advertising.

**Law stated - 30 April 2026**

## Test and study results

### Do claims suggesting tests and studies prove a product's superiority require higher or special degrees or types of proof?

In general, Armenian legislation prohibits making false claims regarding the results of research and testing, citations from technical or scientific publications or statistical data. Such claims must be substantiated by appropriate documentation. In practice, such documentation may be considered an expert opinion issued by a licensed expert company.

**Law stated - 30 April 2026**

## Demonstrating performance

### Are there special rules for advertising depicting or demonstrating product performance?

The general rule is that it is prohibited to carry out advertising that uses advertising images, musical and sound effects, or other means to mislead consumers. At the same time, there are specific sector-based rules for advertising that depict or demonstrate product performance. These include:

It is prohibited, in the advertising of alcoholic beverages, tobacco, tobacco products, their accessories, tobacco substitutes (except those used for medical purposes) and imitations of tobacco products, to show or depict the process of their use.

It is prohibited, in advertisements for alcoholic beverages and energy drinks, to feature or depict persons under 25 years of age.

In the advertising of lotteries, gambling or casinos, the display of money is prohibited.

Placing advertising inscriptions or images promoting the product on the packaging of breast milk substitutes is prohibited.

Advertisements that contain audio or visual content that may cause moral or physical harm to minors are prohibited.

**Law stated - 30 April 2026**

### **Third-party endorsements**

#### **Are there special rules for endorsements or testimonials by third parties, including statements of opinions, belief or experience?**

In addition to the general rules of accuracy, legality, and appropriateness of advertisements, Armenian advertising legislation sets some specific rules for using other third-party endorsements, opinions or experiences.

Endorsements by legal or natural persons must be authentic, verifiable by appropriate documentation and not expired.

For advertisements on e-commerce platforms, consumer reviews must come from individuals who have actually used or purchased the product, work or service. Advertisers must take reasonable steps to verify this.

Creating fake reviews or artificially inflating views to promote products, works or services on e-commerce platforms is prohibited as misleading advertising.

Advertisements for medicines in mass media cannot cite endorsements from scientists, healthcare professionals, public figures or organisations if they could encourage use.

Using an individuals' name or image in advertising without their consent is prohibited (eg, claiming in an advertisement that a particular person has used the product).

**Law stated - 30 April 2026**

### **Guarantees**

#### **Are there special rules for advertising guarantees?**

Under the Law on Advertising, it is prohibited to include false information in advertisements regarding references to guarantees by legal entities or individuals, as well as regarding the use of expired or short-term guarantees.

Advertisements may not provide consumers with false information about the possibility of repairing a product when, in reality, the product cannot be repaired. Information in advertisements regarding product exchange, return, repair or maintenance must be authentic and verifiable.

In advertising lotteries, gambling, online gambling or casinos, creating the impression that income or winnings are guaranteed is prohibited.

Advertisements for medicines in mass media may not cite guarantees from scientists, healthcare professionals, public figures or organisations in a way that could encourage use.

Financial institutions' advertisements may not include guarantees, forecasts or promises regarding the future performance or effectiveness of their activities, nor may regular stock advertisements guarantee dividends.

**Law stated - 30 April 2026**

### **Environmental impact**

#### **Are there special rules for claims about a product's impact on the environment?**

General rules on the prohibition of misleading advertising apply.

At the same time, the Law on "Consumer Protection" defines environmental verification as any representation in commercial communication – textual, visual, graphic or otherwise (including labels, product names, brand names or trademarks) – that states or creates the impression that a seller, product (work or service) or trademark owner has a positive or neutral environmental impact or causes less environmental harm than others, or has improved its environmental impact over time.

Environmental verification are considered misleading if they refer to the entire product, service or overall business activity, while in reality they relate only to a specific characteristic of the product or a particular aspect of the business activity.

Under the Law on Organic Agriculture, terms such as "organic," or equivalent terms such as "ecological," "environmentally friendly," "biological," or their abbreviations ("eco", "bio"), may be used in advertising only if:

- the product is produced through certified organic farming methods; and
- Imported products must be accompanied by corresponding certification documents confirming compliance with organic standards.

**Law stated - 30 April 2026**

### **Free and special price claims**

#### **Are there special rules for describing something as free or a free trial or for special price or savings claims?**

Armenian legislation prohibits presenting a product, service or work as "gratuitous," "free," or "without charge" if the consumer is obligated to make any payments beyond the standard costs of receiving or delivering the item. A business cannot invite consumers to purchase an item at a specifically defined price if there are objective grounds to believe they cannot fulfil the orders in reasonable time frames and volumes. It is also forbidden to advertise a specific price and subsequently refuse to show the item, refuse to take orders, fail to deliver it within a reasonable time frame, or intentionally display a defective sample with the motive of promoting a different product.

Specific sectors face additional restrictions regarding free offerings and promotions. The free distribution of samples for tobacco products, their accessories, tobacco product substitutes (excluding those used for medical purposes), and tobacco product imitations is prohibited. When advertising medicines among persons carrying out activity in the medical and pharmaceutical system, it is prohibited to offer, provide or promise free samples of medicines, gifts, profit or remuneration in monetary or material expression. It is prohibited for persons carrying out activity in the medical and pharmaceutical system to demand or accept any kind of incentive, with the exception of price discounts and privileges, as well as support for events for professional and scientific purposes. Additionally, financial organisations are forbidden from using terms such as "free," "0 percent," or similar phrases in loan advertisements if any fee is or will be charged during a specific time frame, or if interest or fees may apply to subsequent loans, or if interest or fees can be charged based on conditional factors.

When businesses offer discounts, the price reduction must be calculated from the item's average declared selling price over the preceding month. This baseline is determined using the highest daily price offered, factoring in days without sales while excluding isolated targeted marketing rates. Discount promotions cannot exceed three months, their conditions must be absolutely clear, and the pre-discount price must be restored immediately upon conclusion, barring broader economic shifts. For promotions involving gifts or package deals rather than direct price cuts, businesses are prohibited from covertly inflating the item's base price to cover the cost of the bonus. Once a non-price promotion ends, a mandatory one-month cool-down period applies before a similar promotion can be offered on that same item.

All promotional advertisements require strict transparency. Announcements must detail the promotion's nature, conditions, duration and applicable inventory; if the scope is unstated, it legally applies to the entire store. Disclosures must be highly legible, with font size differences strictly capped at a two-to-one ratio. Advertisements must simultaneously display both the preceding month's average price and the new discounted price. Furthermore, if a promotion advertises a maximum "up to" discount percentage, that specific discount must apply to at least one-fifth of the participating inventory. Lastly, if any promotion is terminated early, the business must immediately withdraw all related advertising.

**Law stated - 30 April 2026**

### **New and improved**

#### **Are there special rules for claiming a product is new or improved?**

There are no special rules for claiming a product is new or improved. General rules apply.

Nevertheless, presenting a software update as a requirement for maintaining a product's overall functionality, when in fact it is intended to improve only certain individual functional components of that product, also constitutes a form of misleading advertising.

**Law stated - 30 April 2026**

### **Claims of origin**

## Are there special rules for claiming where a product is made (such as country of origin)?

Under the Armenian legislation, intellectual property objects include:

- geographical indications: names of a territory or country used for products originating there, whose quality or reputation is mainly linked to that origin and are produced and/or processed and/or prepared in that area; and
- appellations of origin: geographical names of a territory or country used for products originating there, whose qualities are mainly or exclusively due to natural and human factors of that area, and whose production, processing, and preparation take place within that area.

Legal protection for geographical indications and appellations of origin is granted only after state registration. Registered geographical indications and appellations of origin are protected against any false or misleading indication used in the advertising of goods regarding their origin, geographical source, natural conditions or essential qualities, which may mislead consumers or cause confusion as to the product's geographical origin.

Goods originating from Armenia, as well as goods produced in other countries and bearing a registered geographical indication or appellation of origin, may be advertised using the terms "Protected Geographical Indication" or, "Protected Appellation of Origin" and/or national symbols approved by the government, while their unlawful use is prohibited.

Any person may require the removal of a geographical indication or appellation of origin from unlawful advertising use, and, where it is impossible, seizure and destruction of goods or packaging in accordance with the law.

Food products and food-contact materials must indicate the country of origin on their labelling.

The production and therefore advertising of falsified medicines and falsified medicinal substances (products that are intentionally and/or fraudulently misrepresented, including with incorrect information regarding origin, such as the manufacturer, country of manufacture, country of origin or marketing authorisation holder) is prohibited.

**Law stated - 30 April 2026**

## PROHIBITED AND CONTROLLED ADVERTISING

### Prohibited products and services

#### What products and services may not be advertised?

Advertising is banned for tobacco products, accessories, non-medical substitutes, imitations, infant formula and any food for babies under six months old, as well unregistered medical products, unlicensed medical entities or the commercial sale of human organs. Prescription drugs cannot be advertised through mass media and services such as surrogacy or egg/sperm donation are restricted to specifically licensed facilities.

Unlicensed gambling, lotteries and casinos are prohibited from advertising. Licensed casinos and betting shops are limited to advertising only on their official websites or

physical premises. Public broadcasters are forbidden from airing ads for lotteries, betting or nightclubs and mass media cannot promote monetary winnings from promotional lotteries.

The advertising of weapons and military ammunition is banned, except for civilian weapons.

Services offering to complete academic assignments (essays, dissertations, etc) cannot be advertised.

**Law stated - 30 April 2026**

## **Prohibited advertising methods**

### **Are certain advertising methods prohibited?**

Advertising methods must not mislead consumers through manipulative designs, deceptive pricing, fabricated research, false statistics, fake awards or intellectual property forgery. It is prohibited to exploit trust, inexperience, prejudices or superstitions or to present information contradicting actual market demand. Advertisements cannot incite violence, panic or moral violations, nor threaten health, safety or the environment. Using offensive demographic language, defaming state symbols or discrediting competitors, legal entities and non-consumers is strictly banned. Finally, making unjustified comparisons, misleading consumers about acquiring a full product series or employing "umbrella advertising" – defined as promoting a product using a trademark or trade name identical or confusingly similar to those of legally restricted goods, services or entities – are expressly forbidden. Advertising goods, services or works via messaging is prohibited without the explicit consent of the data subject (person to whom the personal data relate), or if previously granted consent has been withdrawn. Additionally, because consent is inherently time-bound, sending promotional messages after the agreed-upon consent period has expired is also forbidden.

As of recent development, the Commission considers a publications or messages as an advertising if it aims to maintain interest, re-engage former customers or attract new ones. From a competition law perspective, it is irrelevant whether the message is sent to the general public or individually; all such communications must comply with applicable advertising restrictions and mandatory warning requirements. At the same time, an advertising (including messages sent by any communication means) involving the processing of personal data without the data subject's proper consent is prohibited. Such consent must be clear, informed and explicit, and it must be evident to the subjects that their specific action also implies consent to the use of their personal data. The consent must clearly define its duration, nature and purpose, and it must include information on the data subject's right to request correction, deletion or cessation of data processing.

**Law stated - 30 April 2026**

## **Protection of minors**

### **What are the rules for advertising as regards minors and their protection?**

Advertisements exploiting minors' inexperience, causing them moral or physical harm or undermining the authority of parents and educators are prohibited. Minors can't appear visually or audibly in advertisements unless the product is specifically intended for them.

Alcohol and energy drink promotions are banned in youth-oriented media and within educational, medical, cultural, sports and entertainment facilities. These advertisements can't address minors directly or depict anyone under the age of 25. Energy drink promotions must also include a mandatory health warning regarding children under 18, pregnancy and specific medical conditions. Advertising of infant formula and food intended for babies under six months old is completely banned.

Advertisements for lotteries, casinos and internet gambling are prohibited from addressing minors in any manner.

**Law stated - 30 April 2026**

## **Credit and financial products**

### **Are there special rules for advertising credit or financial products?**

Financial organisations, including banks, insurance companies and entities carrying out securities transactions, can't advertise without holding the legally required operational licence when the advertisement is ordered and published. Promotional materials must exclude irrelevant quantitative data and cannot guarantee, predict, or promise future performance, such as rising stock prices or common stock dividends. Using terms such as "free" or "0 percent" for loans is strictly forbidden if any current or future fees apply, or if interest rates depend on varying factors. Any advertisement mentioning a specific service or tariff must clearly display the institution's name, contact details and website. If nominal interest rates are advertised, the annual percentage yield or actual annual interest rate must be displayed with equal prominence, format and font size, and multiple featured services must be clearly distinguished to prevent consumer confusion.

Advertising public securities offerings generally requires a Central Bank-approved prospectus, though exemptions exist for qualified investors, high-value individual transactions or specific internal corporate share swaps. Advertised information must strictly align with the prospectus, avoid misleading claims and explicitly state where the prospectus can be accessed. These campaigns can launch after the official offering announcement, while issuing or advertising public offers for bearer securities is prohibited.

Any advertisement from a financial organisation that directly or indirectly mentions a service or its tariffs must include the advertiser's company name, website address and contact details, such as a phone number or email. If the advertisement specifies a tariff, like an interest rate or mandatory fees, it must state that more detailed information is available at the financial organisation and provide a link to the company's website; for electronically published advertisements, this link must direct the consumer straight to the webpage describing the specific service. When a service's tariff has established minimum and maximum values, both must be explicitly stated. Similarly, if minimum and maximum nominal interest rates are provided, the corresponding minimum and maximum Annual Percentage Rate or Annual Percentage Yield must also be displayed, and they cannot be presented in a different format, such as a smaller font size, than the nominal rate. If an advertisement features multiple services, their respective characteristics must be clearly

separated so consumers can easily distinguish them. For printed promotional materials, the text must feature a visually prominent and distinct disclaimer – using a different font, size, colour or style – declaring that the material is an advertisement and that comprehensive details are available at the organisation. Finally, marketing messages sent to personal email addresses must have accurate "From" and "To" fields that clearly identify the sender, a subject line that accurately reflects the email's content, clear presentation showing it is an advertisement, and a visually prominent explanation, using a distinct font, size or colour, detailing exactly how the consumer can opt out of receiving future promotional communications.

**Law stated - 30 April 2026**

### **Therapeutic goods and services**

#### **Are there special rules for claims made about therapeutic goods and services?**

Advertising medicines, medical devices and treatments requires prior Ministry of Health permission, explicitly displaying the permit details. Medical facilities, pharmacies and education promotions must present their operational licences. Outdoor medicine advertisements, promoting unregistered products or unlicensed entities, and marketing supplements or cosmetics as cures are prohibited.

Mass media can advertise over-the-counter, non-narcotic, non-psychotropic drugs matching officially approved characteristics. They must include the warning: "The drug has contraindications; it is advisable to consult a doctor before use," and cannot mention severe conditions like tumour, cardiovascular, infectious, metabolic diseases or chronic insomnia. Advertisements cannot guarantee efficacy, claim no side effects, discourage doctor visits, use endorsements, assert safety based on "natural" origin or use alarming health statements. Professional-targeted advertisements can't use mass media at all.

Treatment advertising permits are granted to licensed providers, whose licence details must be displayed. Promoting unproven results, claiming to cure incurable diseases or using patient testimonials is forbidden. Medical device advertisements must state if users must read instructions. Promotional content must be identified as advertising and all materials must be retained for two years for inspection.

**Law stated - 30 April 2026**

### **Food and health**

#### **Are there special rules for claims about foodstuffs regarding health and nutrition, and weight control?**

Food advertisers must possess official documentation proving their products are safe for human consumption. Marketing "special purpose" foods requires explicit prior approval from the Ministry of Health; this includes products with artificially altered nutritional values, non-natural additives, specific demographic formulations and any foods claiming therapeutic, healing or disease-preventative properties. The marketing of infant formula, food products and related accessories intended for babies under six months of age is banned.

Umbrella advertising is prohibited; advertisers can't promote a general trademark, brand or company name if that specific brand produces legally restricted food types, ensuring companies cannot leverage corporate logos to bypass marketing bans.

**Law stated - 30 April 2026**

## **Alcohol**

### **What are the rules for advertising alcoholic beverages?**

Advertisements for both alcohol and energy drinks must not claim therapeutic, stimulating or relaxing properties, nor suggest consumption brings physical, social or personal success. Advertisers can't encourage consumption, criticise moderation, address minors directly, depict anyone under 25, or visually show the actual drinking process. Neither category can be advertised on the front page or cover of newspapers and magazines. Alcohol advertisements can't highlight high alcohol content as a positive attribute. Energy drink advertisements must not imply they aid athletic success, preserve health, quench thirst after physical exertion or should be mixed with alcohol. Energy drink promotions must warn against excessive use and include the mandatory disclaimer: "Not recommended for children under 18, during pregnancy and breastfeeding, as well as for persons suffering from high nervous excitability, insomnia, and high blood pressure". Electronic mass media is entirely prohibited from broadcasting advertisements for energy drinks and strong alcohol (20% or more alcohol by volume) between 06:00 and 22:30.

**Law stated - 30 April 2026**

## **Tobacco**

### **What are the rules for advertising tobacco products?**

The law prohibits all forms of advertising, sales promotion and sponsorship for tobacco products, their accessories, tobacco product substitutes (except those used for medical purposes) and tobacco product imitations, including any advertisements depicting their use. Any sponsorship by tobacco products or tobacco product substitutes is forbidden. Within sales areas, it is illegal to place tobacco products, their accessories, tobacco product substitutes, or tobacco product imitations, along with their empty or enlarged packaging, trademark-imitating colour posters, trademarks or symbols, in any location visible to the consumer.

It is illegal to represent the use of tobacco products, their accessories or tobacco product substitutes (excluding medical substitutes) through speech, sound, or image in advertisements for other goods, works or services. Mentioning or incorporating these items or tobacco product imitations in other advertisements is forbidden. The visual or audio depiction of tobacco products, their accessories, tobacco product substitutes, or tobacco product imitations in audiovisual works broadcast via television, radio or the internet is permitted exclusively if the broadcaster transmits clear audio or visual information regarding the harmfulness of using tobacco products or tobacco product substitutes at the beginning of or during the broadcast.

## Gambling

### Are there special rules for advertising gambling?

In general, any form of advertising of gambling, online gambling, casinos or their organisers is prohibited, including on television, radio, or the internet. Permitted advertising is limited only to official websites or within/on the buildings, structures, or premises of casinos, gambling, or online gambling facilities.

Advertisements for gambling, online gambling, or casinos must clearly display the "21+" label. Unlicensed gambling, online gambling or casino organisers are not permitted to advertise such activities in Armenia.

It is prohibited, in advertisements of gambling, online gambling or casinos, to: (1) address minors in any manner; (2) suggest participation provides regular income or replaces employment; (3) imply guaranteed profit; (4) claim it leads to social, professional, or athletic success; (5) criticise non-participation.

Advertisements for gambling, online gambling or casinos must include warning information about the prohibition of participation while intoxicated or in a distressed mental state.

They must also contain one of the following warnings: "Warning: Participation in the game involves a risk of financial loss" or "Warning: By participating, you may incur financial losses."

Such warning must be at least as prominent as the other content of the advertisement.

It is prohibited to mention gambling, online gambling or casinos as sponsors in public broadcasters' programs.

It is also prohibited to enable participation in online gambling organised in foreign countries by entities that do not hold a valid licence under the legislation of Armenia, as well as to advertise such games in Armenia or in the internet domain accessible from Armenia.

Recently, within administrative proceedings initiated against gambling organisers, the Commission has addressed the specifics of advertising in the gambling sector and reaffirmed that whenever an advertisement presents a product's attractive features, its unattractive features must also be presented, meaning that all possible risks and negative consequences must be especially emphasised.

Comprehensive legislative amendments have currently been adopted in the gambling and lottery sectors, which are not yet fully in effect. Nevertheless, these amendments have not resulted in any changes to the applicable advertising requirements in these sectors.

## Lotteries

### What are the rules for advertising lotteries?

Advertising of lotteries (including totalisators) or their organisers is also prohibited in any form, except on their official websites or within/on the premises of totalisators (gaming halls, bookmaker offices).

The broadcast of the prize draw for draw-based or hybrid lotteries may be conducted with the frequency specified in the lottery organisation and operation rules agreed with the Ministry of Economy. Such broadcasts may be aired as audiovisual content only between 22:00 and 07:00, and their total duration must not exceed 30 minutes.

Outdoor advertising shall not exceed 5 square metres and shall contain only the company name (logo). Outdoor advertising placed near the entrances of buildings, structures, or halls shall not exceed 0.5 square metres and shall also contain only the company name (logo).

When advertising totalisators, the "21+" label must be clearly visible, while advertising draw-based, non-draw-based or hybrid lotteries must display the "18+" label.

Organisers of lotteries without the relevant licence are also not permitted to advertise such activities in Armenia.

It is prohibited, in advertisements of gambling, online gambling or casinos, to: (1) address minors in any manner; (2) suggest participation provides regular income or replaces employment; (3) imply guaranteed profit; (4) claim it leads to social, professional or athletic success; or (5) criticise non-participation.

Advertisements for lotteries (game of chance) must include warning information about the prohibition of participation while intoxicated or in a distressed mental state.

They must also contain one of the following warnings: "Warning: Participation in the game involves a risk of financial loss" or "Warning: By participating, you may incur financial losses".

Such warning must be at least as prominent as the other content of the advertisement.

Advertising of lotteries (including non-draw, draw-based, hybrid and promotional lotteries) and totalisators is prohibited in public broadcaster programmes.

Only lottery organisers may use the word "lottery" (or its derivatives or translations) in their advertisements, except in cases where it is clearly evident from the context that the term does not refer to lottery organising activities.

It is prohibited to facilitate participation in lotteries organised in foreign countries by entities that do not hold a valid licence under the legislation of Armenia, as well as to advertise such lotteries in Armenia or in the internet domain accessible in Armenia.

**Law stated - 30 April 2026**

## **Promotional contests**

### **What are the requirements for advertising and offering promotional contests?**

A promotional contest is organised with the purpose of advertising services or goods, whereby the prize fund is entirely formed by the advertiser at the expense of the net profit formed as a result of their previous year's activity and cannot exceed 8% of the revenue received from the realisation of the given good or service in the previous year. At the same

time, in order to legally offer and advertise a promotional contest without it being regulated as a standard lottery, it must meet strict financial criteria. In particular, the law provides that if the prize fund is not formed entirely from net profit and exceeds the 8% threshold, the activity is considered lottery organisation. In such cases, the general rules on lottery advertising established by the Law on Advertising apply

Advertising the monetary prizes of a promotional contest through mass media is prohibited. Additionally, the advertisement of a promotional contest in the programmes of the public broadcaster is prohibited

Recently adopted but not yet fully implemented legislative amendments in the lottery sector introduce new regulation regarding promotional contests. In particular, for an activity to qualify as a promotional contest, the prize fund must not exceed the higher of either 0.5% of the organiser's previous year's turnover or 0.5% of the current year's turnover. The prize fund must be formed exclusively from the organiser's own funds.

**Law stated - 30 April 2026**

### **Indirect marketing**

#### **Are there any restrictions on indirect marketing, such as commercial sponsorship of programmes and product placement?**

Sponsors are prohibited from interfering with or influencing the audiovisual program's content and direction. Sponsorship is banned for news broadcasts, official announcements and political programmes. Additionally, sponsorship cannot be provided by political parties, foundations managed by or established with party leaders, pre-election funds, religious organisations or any entities involved in illegal activities or the production, sale and mentioning of prescription drugs. Public broadcasters are specifically prohibited from featuring sponsors associated with lotteries, games of chance, online gambling, casinos, nightclubs or any other goods and services banned from audiovisual advertising by law. A sponsorship ban for public broadcasters also applies to tobacco; however, while the legislation uses the term "tobacco", it does not explicitly define it; instead, it categorises specific items, such as tobacco products, their accessories, substitutes and imitations.

When sponsorship is legally permitted, the programme must clearly display the sponsor's name, symbol or trademark, which can be shown a maximum of three times per hour for no longer than 15 seconds each time. While public broadcasters are generally restricted to a maximum of five minutes of advertising per broadcast hour, this specific time limit does not apply to sponsor mentions during cultural, educational, scientific-educational and sports programmes. Instead, sponsor mentions during these specific types of programmes are capped at 2.5% of the programme's total duration.

Although there are no specific regulations governing product placement, if its execution provides substantial grounds to qualify it as advertising, it will be subject to general advertising rules.

**Law stated - 30 April 2026**

## Other advertising rules

Briefly give details of any other notable special advertising regimes.

Other notable advertising regulations impose strict broadcast limits, capping general ads at 14 minutes and promotional programming at 5 minutes per hour. Commercial breaks are restricted to a single interruption for audio programmes under 10 minutes or audiovisual programmes under 20 minutes, and they are entirely prohibited during news programmes or just before elections. Additionally, outdoor advertising is banned inside museums, historical monuments and government buildings. Ads for public entertainment must disclose key event details – such as the advertiser, genre, participants, location and time – and clearly state whether the performance is live or uses recorded audio, ensuring this specific disclaimer occupies at least 7% of the visual space or audio volume.

Advertisements and offers directed at an indefinite audience are considered an invitation to make an offer, unless specified otherwise. An offer is a proposal addressed to one or several specific persons, which definitely reveals the intention of the offeror to consider the contract as entered into with the person having accepted the offer. Additionally, an offer, containing all the essential conditions of a contract, which imply the will of an offeror to enter into a contract with each offeree on the conditions specified in the offer, shall be deemed to be a public offer.

Law stated - 30 April 2026

## SOCIAL MEDIA

### Regulation

Are there any rules particular to your jurisdiction pertaining to the use of social media for advertising?

Armenia lacks dedicated regulations for social media advertising; instead, these activities are governed by the RA Law on Advertising. Because the law broadly defines advertising as the dissemination of information through any media to generate or maintain interest, all general statutory requirements may apply to social media content. Nevertheless, the law's vague definitions regarding electronic mass media continue to create legal uncertainty for modern digital actors, including bloggers and social networking sites.

Law stated - 30 April 2026

### Regulation

Have there been notable instances of advertisers being criticised for their use of social media?

There are currently no notable instances of advertisers being criticised specifically for their use of social media.

Law stated - 30 April 2026

## Regulation

### Are there regulations governing privacy concerns when using social media?

There are no specific statutory regulations exclusively governing privacy concerns on social media platforms. Instead, privacy is managed under the broad framework of the general Law on Protection of Personal Data, which applies to all forms of data processing regardless of the medium. Under this law, processing personal data is lawful only if conducted according to statutory requirements and with the data subject's explicit, clear and conscious consent. Data controllers and processors are obligated to ensure compliance with these laws by processing the minimum amount of personal data necessary for lawful and specific purposes.

Data cannot be used for alternative reasons without explicit consent and must be retained only until the specific, lawful purpose of the processing is achieved. Consent is not indefinite; it is valid only within defined time frames (even less) strictly for the duration necessary to realise the data processing objectives. For consent to be legally valid, it must be obvious to the individual that their specific action implies consent to use their personal data. Furthermore, the purpose of the consent, as well as its duration and temporary nature, must be clearly apparent to the user.

Additionally, data controllers must ensure individuals are fully informed of their right to withdraw their consent. For example, if a person consents to data processing and subsequently receives messages based on that consent, they reserve the right to withdraw it at any time, either fully or partially. Upon withdrawal, the data processor is strictly obligated to cease processing the individual's data, stop sending messages and halt any related actions. The controller must disclose this mechanism clearly so that the individual is actively aware of their right to withdraw.

Law stated - 30 April 2026

## UPDATE AND TRENDS

### Recent developments

#### Are there any emerging trends or hot topics in your jurisdiction?

Currently the regulation of advertising sector is increasingly focused on the strong protection of consumer interests, based on the assumption that consumers may lack professional knowledge regarding the characteristics and properties of goods, works or services. This approach is intended to protect consumers from the exploitation of their lack of awareness and limited expertise by businesses.

Accordingly, the legislative amendments currently under consideration place primary emphasis on further detailed definitions of "misleading" and "comparative" advertising, including the establishment of criteria to be taken into account when determining whether an advertisement is misleading.

The other challenge is digital advertising where the Armenian residents may be targeted by the foreign businesses whose advertisements contradict the Armenia's mandatory regulations. Regulators are currently seeking legislative and practical developments to ban such advertising within the country.

Law stated - 30 April 2026