

Case Report

Case number: 0239-25
Advertiser: Honey Birdette
Medium: Store Window
Decision date: 8-Oct-2025
Decision: No breach

ISSUES CONSIDERED BY THE COMMUNITY PANEL

- AANA Code of Ethics - 2.2 Exploitative or Degrading - no breach
- AANA Code of Ethics - 2.4 Sex/sexuality/nudity - no breach

AD DESCRIPTION

This digital store window ad features a woman wearing a sheer black bodysuit with black nipple covers. The words “SUMI BLACK” appear below her image. The Panel noted that the ad was seen in Lakeside Joondalup.



SUMMARY

Complaint

A complaint was received on the grounds that the ad objectifies women and is sexually inappropriate for a broad audience that would include children. The complainant added that these images are inappropriate for public display in malls where children are engaging in holiday entertainment nearby.

Advertiser response

The advertiser responded that the campaign in question was created with professional models and photographers to present this product in a bold and stylised fashion context. There is no nudity on display, and the image is consistent with international fashion and lingerie advertising.

The advertiser's full response is included in Appendix A.

Decisions

The Panel found that the ad did not breach sections 2.2 or 2.4 of the Code of Ethics. The image was not exploitative or degrading, but portrayed a confident, empowered model. The ad was published with due sensitivity to the relevant broad audience.

ASSESSMENT AND DECISIONS

Section 2.2 (Code of Ethics): Advertising shall not employ sexual appeal in a manner which is exploitative or degrading of any individual or group of people.

The Practice Note includes the following definitions:

Exploitative - (a) taking advantage of the sexual appeal of a person, or group of people, by depicting them as objects or commodities; or (b) focussing on their body parts where this bears no direct relevance to the product or service being advertised.

Degrading – lowering in character or quality a person or group of people. Treating humans as sexual objects or commodities for sale perpetuates the harmful view that people ... are evaluated based on their appearance ...

The Community Panel may have regard to the context or medium in which the material appears.

Panel assessment

- **Does the ad use sexual appeal?**

The Panel considered that the advertiser's business is to sell lingerie and other related items. The Panel noted that the model is dressed in one such item, which can reasonably be said to contain sexual appeal.

Accordingly, the Panel considered the ad does use sexual appeal.

- **Does the ad use sexual appeal in a manner that is exploitative?**

The Panel also considered that that this appears to be an outfit targeting women, which meant that using a female model was reasonable.

The Panel considered that the model was not presented as a commodity or sexual object for sale. The Panel considered that while her breasts are visible under the sheer bodysuit, the overall focus was on how the bodysuit looks in total, as opposed to only her breasts, or any other part of her body that might be perceived to be exploitative.

The Panel considered that the model appears confident, and there is nothing in the ad to suggest that she is subservient, or otherwise being exploited.

The Panel considered that the ad does not employ sexual appeal in a manner which is exploitative of the model.

- **Does the ad use sexual appeal in a manner that is degrading?**

The Panel considered that nothing in the ad appeared to lower the character or quality of the model. The Panel considered that the image was product-relevant, and that there was nothing to suggest some sort of power imbalance or other form of exploitation. The Panel considered that there was nothing in the ad that could be said to perpetuate the harmful view that the model, or women in general, are evaluated on their looks or sexuality.

The Panel considered that the ad does not employ sexual appeal in a manner which is degrading to the woman.

Panel decision

The Panel found that the ad did not breach section 2.2 of the Code of Ethics.

Section 2.4 (Code of Ethics): Advertising shall treat sex, sexuality and nudity with sensitivity to the relevant audience.

The Practice Note states:

Overtly sexual images are not appropriate in outdoor advertising or shop front windows.

Although not exhaustive, the following may be considered to be overtly sexual:

- People depicted in sheer lingerie or clothing where a large amount of buttocks, female breasts, pubic mound or genital regions can be seen;
- The use of paraphernalia such as whips and handcuffs, particularly in combination with images of people in lingerie, undressed or in poses suggestive of sexual position

Images of models in bikinis or underwear are permitted, however, unacceptable images could include those where a model is in a suggestively sexual pose, where underwear is being pulled up or down (by the model or another person), or where there is clear sexual innuendo from the ad (e.g. depicting women as sexual objects).

Panel assessment

- **Does the ad contain sex?**

The Panel noted that the AANA Code of Ethics defines “sex” as “sexual intercourse; person or persons engaged in sexually stimulating behaviour”.

The Panel considered that nothing in the ad could reasonably be interpreted as sex. The Panel considered that the model is alone and is not posed in a manner that suggests any form of sexually stimulating behaviour.

- **Does the ad contain sexuality?**

The Panel noted the definition of sexuality in the Practice Note is “the capacity to experience and express sexual desire; the recognition or emphasis of sexual matters”.

The Panel considered that the style of the lingerie being worn by the model was sexualised, and the ad contains sexuality.

- **Does the ad contain nudity?**

The Panel noted that the definition of nudity in the Practice Note is “the depiction of a person without clothing or covering; partial or suggested nudity may also be considered nudity”.

The Panel considered that, while the model’s nipples were covered and her genital area was not visible, her breasts remained visible in a manner that would be regarded as partial nudity.

The Panel, therefore, considered that the ad contained nudity.

- **Are the issues of sexuality and nudity treated with sensitivity to the relevant audience?**

The Panel noted that the definition of sensitivity in the Practice Note is “understanding and awareness to the needs and emotions of others”.

The Panel noted that assessing whether sexuality or nudity is ‘sensitive to the relevant audience’ requires consideration of who the relevant audience is and how they are likely to react to or feel about the ad.

The Panel considered that that the image appears in store windows and considered that the relevant audience includes retail workers, people shopping in the Honey Birdette store and people who are walking past the store, and that this last group would include children.

The Panel acknowledged that some members of the community would prefer fetish style products not be advertised where children can view them. The Panel considered that the image did not feature explicit nudity and that the model was not posing suggestively, The Panel considered that overall the content is not overtly sexual and did treat the issues of sexuality and nudity with sensitivity to the relevant broad audience, including children.

Panel decision

The Panel found that the ad did not breach section 2.4 of the Code of Ethics.

OTHER CONSIDERATIONS

The Panel found that the ad did not breach any other section of the advertising codes.

APPENDIX A: ADVERTISER RESPONSE IN FULL

We note the concerns raised regarding the “Sumi Black” campaign imagery.

Honey Birdette is a luxury lingerie brand. The campaign in question was created with professional models and photographers to present our product in a bold and stylised fashion context. The image referenced depicts a woman in a sheer black bodysuit, the garment fully covers the body and nipples. There is no nudity on display.

We strongly reject the description of the imagery as “pornography” or “dehumanising.” The creative is consistent with international fashion and lingerie advertising. The purpose of the imagery is to showcase our product as part of a luxury campaign, not to objectify or degrade.

We respect that not all members of the community will share the same views on lingerie advertising. However, we stand by our campaign and the creative direction we have chosen.

Given the repeated nature of these objections from the same location, we also question whether this matter requires a formal review.