

# ASA Ruling on Golden Vape UK Ltd

⌘ Upheld | Website (own site) | 11 February 2026

## Ad description

Seven product listings for nicotine containing e-cigarette products, sold by Golden Vape, seen on eBay on 25 September 2025.

a. The first eBay listing, for “IVG 2400 4 in 1 Rechargeable & Refillable Pod Kit” featured the text, “BUY 3 GET 1 FREE (Add 4 into cart)” and “BUY 7 GET 4 FREE (Add 11 into cart)”. Text above the product image stated, “BUY 7, GET 4 FREE (add 11 to basket) See all eligible items and terms”. The product description repeated the offers under the heading, “SPECIAL BUNDLE OFFERS”.

b. The second eBay listing, for “Edge E-liquid 50/50 Vape Juice 10ml” featured the text, “BUY 5 GET 5 FREE (Add 10 into cart)”. Text above the product image stated, “BUY 5, GET 5 FREE (add 10 to basket) See all eligible items and terms”. The product description repeated the claim, “To claim offer BUY 5 GET 5 FREE (ADD 10 Bottles into cart)”.

c. The third eBay listing, for “Vapresso Dojo Blast 10k Prefilled Pod”, featured the text, “PACK OF 5 FOR £20.70”. Text above the product image stated, “BUY 2, GET 5% OFF See all eligible items and terms”.

d. The fourth eBay listing, for “Elf Bar 4 in 1 Pods” featured the text, “BUY 3 FOR £17.91; BUY 5 FOR £28.15; BUY 10 FOR £50; BUY 20 FOR £94.40”. Text above the product image stated, “BUY 20, GET 32% OFF See all eligible items and terms”. The product description included the heading, “SPECIAL MIX & MATCH OFFERS”.

e. The fifth eBay listing, for “Lost Mary 4 in 1 Pods” included a “LIMITED TIME OFFER” badge with a clock and featured the text, “BUY 4 FOR £14.04; BUY 10 FOR £29.60; BUY 20 FOR £54.40; BUY 50 FOR £134”. Text above the product image stated, “BUY 20, GET 31% OFF See all eligible items and terms”. The

product description included the heading, “SPECIAL MIX & MATCH OFFERS”.

f. The sixth eBay listing, for “Elf Bar Dual 10k Pods” included a “LIMITED OFFER” badge with a clock and featured the text, “BUY 3 FOR £18.33; BUY 5 FOR £27.30; BUY 10 FOR £48.10; BUY 20 FOR £96.20”, and a site banner “BUY 20, GET 25% OFF”. Text above the product image stated, “BUY 20, GET 26% OFF See all eligible items and terms”. The description stated, “Mix & Match Offers – Save More When You Buy More!” and repeated the price claims.

g. The seventh eBay listing, for “Bar Juice 5000 Refillable Nic Salt”, included a banner on the main image which stated, “Hurry! Limited-Time Offer You don’t wanna miss this!” and featured the text, “BUY 6 GET 6 FREE (Add 12 Into Cart)”. Text above the product image stated, “BUY 6, GET 6 FREE (add 12 to basket)” See all eligible items and terms. The item description header repeated “BUY 6 GET 6 FREE ADD 12 INTO CART TO CLAIM OFFER”.

## Issue

The UK Vaping Industry Association Ltd (UKVIA) challenged whether ads (a) – (g) breached the Code by directly promoting unlicensed nicotine-containing e-cigarettes and their components in online media.

## Response

Golden Vape UK Ltd said the purpose of their eBay product listings was to present factual product information in a clear manner. They did not engage in paid-for advertising or external promotions. They acknowledged that repeated phrases, including those such as “Limited Time Offer”, “Special Mix & Match Offers” and “Hurry!”, and the use of offer-styled badges could be understood as promotional. They said they had amended the listings to remove all promotional elements.

## Assessment

### Upheld

CAP Code rule 22.12 reflected a legislative ban contained in the Tobacco and Related Products Regulations 2016 (TRPR) on the advertising of unlicensed, nicotine-containing e-cigarettes in certain media. The rule stated that, except for media targeted exclusively to the trade, marketing communications with the direct or indirect effect of promoting nicotine-containing e-cigarettes and their components which were not licensed as medicines were not permitted in newspapers, magazines and periodicals; or in online media and some other forms of electronic media. It further stated that factual claims about products were permitted on marketers’ own websites and, in certain circumstances, in other non-paid-for

space online under the marketer's control.

While promotional content was prohibited on marketers' own websites, rule 22.12 specified a particular exception that the provision of factual information was not prohibited. The basis of the exception to the rule was that consumers had to specifically seek out that factual information by visiting a website, as opposed to it being actively promoted to them, as set out in the CAP guidance 'Electronic cigarette advertising prohibitions'. We considered that, in principle, there was likely to be scope for the position relating to factual claims being acceptable on marketers' websites also to apply to product listings on third-party retail platforms.

We considered whether eBay was a non-paid-for online space where such ads, which featured factual claims only, were permitted. The ads were product listings on Golden Vape eBay shop. Golden Vape was registered as a business seller on eBay. We understood that the product listings could be found by users who searched for e-cigarettes using the eBay search function, or other search engines. Because the content on the Golden Vape eBay shop and in the product listings could only be found by those actively seeking it, we considered the Golden Vape eBay shop was non-paid-for online space under the marketer's control which was analogous to Golden Vape's website. Therefore, we considered that factual claims about nicotine-containing e-cigarettes and their components were permitted in that space, including in product listings.

We considered that the claims "SPECIAL BUNDLE OFFERS" in ad (a), "SPECIAL MIX & MATCH OFFERS" in ad (d), "LIMITED TIME OFFER" and "SPECIAL MIX & MATCH OFFERS" in ad (e), "LIMITED OFFER" and "Mix & Match Offers" in ad (f), and "Hurry! Limited-Time Offer You don't wanna miss this!" in ad (g) were used to suggest that the prices displayed were promotional offers intended to encourage users to purchase products from Golden Vape. We therefore considered that the claims in ads (a), (d), (e), (f) and (g) went beyond factual descriptions of the products sold by Golden Vape and that they were promotional in nature.

Ads (a), (b) and (g) featured the claims "BUY 3 GET 1 FREE", "BUY 5 GET 5 FREE", and "BUY 6 GET 6 FREE". Those ads also featured text generated by eBay, such as "BUY 7, GET 4 FREE (add 11 to basket)", alongside a red price tag. We understood that this text was generated based on settings chosen by Golden Vape, and therefore we considered that Golden Vape was responsible for the presentation of this text. We considered that Buy X Get Y Free claims were promotional in nature, as they provided an incentive for consumers to buy by including the benefit of free products. We therefore considered that the claims in ads (a), (b) and (g) went beyond factual descriptions of the products sold by Golden Vape.

The claims "PACK OF 5 FOR £20.70" in ad (c), "BUY 3 FOR £17.91; BUY 5 FOR £28.15; BUY 10 FOR £50; BUY 20 FOR £94.40" in ad (d), "BUY 4 FOR £14.04; BUY 10 FOR £29.60; BUY 20 FOR £54.40; BUY 50 FOR £134" in ad (e), and "BUY 3 FOR £18.33; BUY 5 FOR £27.30; BUY 10 FOR £48.10; BUY 20 FOR £96.20" in

ad (f) all featured in large text in capital letters on solid coloured rectangles within the images on the product listings. We considered that the text used referred to multibuy pricing, offering a discount for buying products in larger quantities. We considered that factual information about pricing, such as offering different bulk prices, was acceptable under the CAP Code. However, we considered that the presentation of the information, using large text in capital letters, on bright coloured backgrounds, went beyond objective, factual claims and incentivised consumers to buy by placing an emphasis on the price. Because of the presentation of the price statements, we considered that the claims in ads (c), (d), (e) and (f) went beyond factual descriptions of the products sold by Golden Vape. We therefore considered they were promotional in nature.

The products featured in the ads were all nicotine-containing e-cigarettes or their components. We therefore considered that the ads had the direct effect of promoting nicotine-containing e-cigarette products. Because promotional claims for nicotine-containing e-cigarettes that were not licensed as medicines were not permitted in online media, we concluded the ads breached the Code.

The ads breached CAP Code (Edition 12) rule 22.12 (Electronic cigarettes).

## Action

The ads must not appear again in the form complained of. We told Golden Vape UK Ltd that marketing communications with either the direct or indirect effect of promoting nicotine-containing e-cigarettes and their components, which were not licensed as medicines, must not appear in prohibited media.

## CAP Code (Edition 12)

### 22.12

---

## More on

**Vaping, smoking and drugs** ...

---

**Contact us:**

The Advertising Standards Authority Ltd. (trading as ASA), registered in England and Wales, Registered Number 0733214

The Advertising Standards Authority (Broadcast) Ltd. (trading as ASAB), registered in England and Wales, Registered Number 5130991

The Committee of Advertising Practice Ltd. (CAP), registered in England and Wales, Registered Number 8310744

The Broadcast Committee of Advertising Practice Ltd. (BCAP), registered in England and Wales, Registered Number 5126412

All companies listed are registered at: Castle House, 37-45 Paul Street, London, EC2A 4LS [\[view on map\]](#)

Tel: 020 7492 2222

Click [here](#) for FAQs and to submit an enquiry.

### **Useful links**

[Accessibility](#)

[Privacy policy](#)

[Cookies policy](#)

[Unacceptable contact](#)

[Careers](#)

[Transparency](#)

[Cymru](#)

[ASA Press Office](#)

[Our newsletters](#)

[Sustainability](#)