

STUDIO AI USE POLICY

Baseline Template for Game Development Studios

Studio Name: *[Your Studio Name]*

Version: 1.0

Effective Date: *[Date]*

Policy Owner: *[Studio Head / Production Director / Legal]*

Next Review: *[Date, recommended: 6 months from adoption]*

ABOUT THIS TEMPLATE

This document is a baseline template derived from published studio AI policies, platform disclosure requirements, SAG-AFTRA Interactive Media Agreement provisions (2025), and legal guidance from practitioners working in game development. It is a starting point, not legal advice. Have it reviewed by qualified counsel before formal adoption, especially if you work with union talent or distribute in the EU.

1. Purpose and Scope

This policy establishes how [Studio Name] defines, evaluates, approves, documents, and discloses the use of generative AI tools in game development. It applies to all employees, contractors, and external partners who work on studio projects.

The goal is not to restrict AI use. It is to make sure that when AI is used, the studio knows about it, has made a deliberate decision to use it, has a process for verifying the output, and has disclosed it appropriately to players and platforms.

WHY THIS EXISTS

Multiple studios have faced player backlash, award revocations, and platform policy violations in 2025 and 2026 because AI-generated assets shipped without disclosure. In most cases, the root cause was not malicious intent. It was the absence of a clear process. This policy is that process.

1.1 What This Policy Covers

- All generative AI tools used at any stage of development, including text, image, audio, video, 3D, and code generation
- AI use in production assets, pipeline tools, localization, marketing materials, and store page content
- Third-party assets purchased or licensed from marketplaces, which may contain AI-generated content
- AI tools used by contractors and outsourced teams working on studio projects

1.2 What This Policy Does Not Cover

- Traditional algorithmic AI that has been standard in games for decades: pathfinding, enemy behavior trees, procedural generation, physics simulation, anti-cheat systems
- AI tools used purely for internal administrative work with no connection to game content: scheduling, HR, accounting

PLATFORM DEFINITION REFERENCE

Steam (as of January 2026) defines the disclosure trigger as AI-generated content that players directly experience. Content generated by AI that never reaches players does not require Steam disclosure. Other platforms have no disclosure requirements. This policy adopts a more conservative internal standard: all generative AI use is logged, regardless of whether it reaches players.

2. Definitions

For the purposes of this policy:

Generative AI

Any AI system that produces new content, including text, images, audio, video, 3D assets, or code, in response to prompts or inputs. This includes but is not limited to: large language models (ChatGPT, Claude, Gemini), image generators (Midjourney, Stable Diffusion, Adobe Firefly), audio tools (ElevenLabs, Suno, Udio), and code assistants (GitHub Copilot, Cursor).

Player-Facing Content

Any content that a player directly sees, hears, or interacts with in the shipped game, including: in-game art, textures, audio, dialogue, UI text, loading screens, and in-game marketing materials. Also includes store page assets, trailers, and screenshots used in distribution.

Pipeline-Only Content

AI-generated content used internally during development that does not ship: placeholder assets, internal documentation, code that is reviewed and rewritten, test data, and reference materials used to inform human creative work.

Placeholder Asset

A temporary asset used during development with the explicit intention of replacing it before ship. A placeholder asset generated by AI must be distinguishable from final-quality work. If an AI-generated asset is good enough to be mistaken for a final asset by a team member unfamiliar with the project, it should be treated as a production asset under this policy, not a placeholder.

THE PLACEHOLDER PROBLEM

Three of the four most documented AI disclosure failures in 2025 and early 2026 used the word 'placeholder' to describe AI assets that shipped. The developer community noted publicly that real placeholder art is deliberately ugly and unmistakable, so it cannot accidentally reach production. If your AI placeholder looks like it could be a final asset, your QA process cannot reliably catch it.

Digital Voice Replica

An AI-generated replica of a specific human voice actor's voice, created from recordings of that performer. Subject to SAG-AFTRA Interactive Media Agreement (2025 IMA) requirements if the performer is or was a union member within the past three years. Requires separate written consent from the performer prior to creation.

Approved Tool

A generative AI tool that has been reviewed and listed on the studio's Approved Tools Register (Appendix A). Use of non-approved tools for any production-adjacent work requires prior written approval from the Policy Owner.

3. Decision Authority

The following roles are responsible for AI use decisions at different levels of risk. Studios should assign these to named individuals before the policy takes effect.

Policy Owner	<i>[Name, Title] -- overall policy accountability, final authority on disputed cases</i>
AI Approver (Production)	<i>[Name, Title] -- approves AI use for player-facing content on a per-task basis</i>
AI Approver (Pipeline)	<i>[Name, Title] -- approves AI use for internal pipeline tools and placeholder assets</i>
QA Lead	<i>[Name, Title] -- responsible for AI asset verification before submission to cert or platform</i>
Legal Contact	<i>[Name, Firm, or 'To Be Assigned'] -- consulted on IP, union, and platform questions</i>

3.1 Approval Levels

Not all AI use requires the same level of sign-off. The following tiers apply:

Tier	Use Case	Required Approval
Tier 1	Player-facing creative content (art, VO, narrative, UI)	AI Approver (Production) + Policy Owner
Tier 2	Player-facing functional content (code, localization, QA output)	AI Approver (Production)
Tier 3	Pipeline-only placeholder assets or internal reference	AI Approver (Pipeline)
Tier 4	Internal tooling with no connection to game	Self-documented, no prior approval

	content	required
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4. Approved Tools Register

The following tools are approved for use under this policy. Tools not on this list require written approval from the Policy Owner before use on any project. This register should be reviewed and updated at least every six months.

Tool / Vendor	Category	Approved Use	Restrictions / Notes
[Tool Name]	[Category]	[Pipeline only / Player-facing with approval]	[e.g. No voice replication of named performers]
[Add row]	[Add row]	[Add row]	[Add row]

THIRD-PARTY ASSET MARKETPLACES

If your studio purchases assets from marketplaces (Unity Asset Store, Fab, GameDev Market, Sketchfab, etc.), you are responsible for verifying that purchased assets are not AI-generated unless your studio's policy permits AI marketplace assets. As of 2025, several major marketplaces have banned AI-generated assets. Others have not. Do not assume. Check the platform policy and, where possible, request a declaration from the seller. Document the result.

5. Pre-Use Requirements

Before using any generative AI tool on a production task, the team member must:

- Confirm the tool is on the Approved Tools Register or obtain prior written approval
- Identify whether the output is player-facing or pipeline-only
- Obtain the appropriate tier approval (see Section 3.1)
- Confirm the tool's training data terms do not create IP exposure for this use case
- Confirm that no personally identifiable information, trade secrets, or proprietary game code will be entered into the tool
- Log the intended use in the AI Use Log (Appendix B) before work begins

5.1 Training Data and IP

Generative AI tools trained on data without clear rights clearance create potential IP exposure for any studio that ships the output. This is an unresolved legal area as of mid-2026. The following minimum checks apply:

- Use tools that offer contractual indemnification for IP claims where available
- Prefer tools trained on licensed or studio-owned data for player-facing creative content
- Do not use publicly available AI tools to generate content that closely replicates a named third-party IP, character, or trademark
- Document the tool and version used for any shipped asset, so the studio can demonstrate the process if a claim arises

COPYRIGHT NOTE

The US Copyright Office confirmed in March 2025 that AI-generated content without meaningful human creative contribution cannot be protected by copyright. If your studio ships AI-generated art with no substantial human creative direction, you may have no IP protection over those assets. Competitors can legally copy them. This is not hypothetical: it is the current legal standard.

5.2 Voice and Performer Requirements

If the studio intends to use AI to generate, replicate, or extend voice performances:

- For union talent (SAG-AFTRA): separate written consent is required from the performer prior to creating a digital voice replica, per the 2025 Interactive Media Agreement. Consult legal before proceeding.
- For non-union talent: written consent specifying the intended uses, duration, and compensation is required before any AI replica is created from that performer's recordings
- AI-generated voices that do not replicate any specific human performer do not trigger these requirements, but must still be logged and approved
- Do not use a performer's name as a prompt in a generative AI tool to produce voice output without separate consent and compensation. This is explicitly covered under the 2025 SAG-AFTRA IMA.

ARC RAIDERS REFERENCE

Arc Raiders (Embark Studios, 2025) used AI text-to-speech voice lines at launch with audio licensed from real voice actors. Player backlash led to post-launch re-recording with human performances. The studio's CEO acknowledged: 'A real professional actor is better than AI. That is just how it is.' The efficiency gain was real. So was the cost of reversing the decision after ship.

6. QA and Verification Requirements

AI-generated output must pass human review before it is treated as production-ready. The QA Lead is responsible for ensuring this process is followed for all player-facing AI content.

6.1 Verification Checklist

For each AI-generated asset submitted for production review, the reviewer must confirm:

- The asset meets the quality bar defined for this category of content
- The asset is visually or aurally consistent with the surrounding handcrafted content
- The asset does not contain AI artifacts: anatomical errors, text gibberish, inconsistent lighting, or other common generation failures
- The asset is documented in the AI Use Log with its tool, prompt, and review outcome
- If the asset is audio: no identifiable voice artifacts that could be attributed to a real performer
- The asset has been tagged in the project management system as AI-origin content

6.2 The Placeholder Rule

Any asset marked as a placeholder, regardless of origin, must be visually distinguishable from final-quality work. This is not new: it has been standard practice in game development for decades, and exists specifically to prevent placeholder content from accidentally shipping.

REQUIRED PRACTICE

AI-generated placeholder assets must be marked with a visible watermark, bright color overlay, or naming convention (e.g. prefix 'AI_PLACEHOLDER_') that makes them immediately identifiable in the engine, in file browsers, and in asset management tools. An AI placeholder that looks like a final asset will ship. This has happened at multiple studios.

6.3 Pre-Submission Checklist

Before submitting a build to platform certification or going gold, the QA Lead and Policy Owner must sign off that:

- All AI-generated content in the build has been reviewed and documented
- All AI-generated player-facing content has received Tier 1 or Tier 2 approval
- No placeholder assets, AI or otherwise, remain in the build
- The studio's Steam disclosure (and any other platform disclosure) has been updated to reflect AI use accurately

- The studio's legal contact has been notified of any AI voice use involving union or contracted talent

7. Disclosure Policy

The studio's position is that disclosure of AI use in shipped games is required where platform policies mandate it, and is recommended where it does not. Retroactive disclosure after player discovery is more damaging than proactive disclosure at launch. The studio has experienced this firsthand or has seen other studios experience it.

7.1 Platform Requirements (as of mid-2026)

Platform	AI Disclosure Required?	Notes
Steam (Valve)	Yes, for player-facing AI content	Disclosure form in Steamworks. January 2026 update: AI used only in dev pipeline (not player-facing) does not require disclosure. Non-compliance may breach distribution agreement.
Epic Games Store	No formal requirement as of mid-2026	Epic has publicly opposed mandatory AI disclosure. No form or requirement as of this writing. Studio may still choose to disclose voluntarily.
PlayStation / Xbox / Nintendo	Check current platform policies	Console platform policies evolve. Confirm with your platform relations contact before submission. These policies were not formally established as of this template's last update.
GOG.com	No formal requirement as of mid-2026	GOG has no AI disclosure requirement. GOG itself faced backlash in 2025 for using AI-generated art in its own storefront promotions.
Apple / Google (Mobile)	Check current platform policies	Mobile platform policies on AI are evolving. Confirm with your platform relations contact.

7.2 Voluntary Disclosure Standard

Where platform disclosure is not required, the studio's default position is:

Studio Disclosure Position	<i>[Choose one: 'Disclose all AI use voluntarily' / 'Disclose player-facing AI use only' / 'Disclose only where required by platform']</i>
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This choice should be made by the Policy Owner and reviewed by legal before the policy is adopted. The studio's position should be consistent across projects.

7.3 Disclosure Language

When disclosure is required or chosen, the following template language may be adapted:

SAMPLE DISCLOSURE LANGUAGE (PLAYER-FACING AI)

This game was developed with the assistance of generative AI tools. [Specific uses: e.g. 'Some background visual assets were created using AI image generation tools, reviewed and directed by our art team.' / 'Certain voice lines were generated using AI text-to-speech technology, with recordings licensed from professional voice actors.'] Human creative direction was applied to all AI-generated content before it was included in the game.

SAMPLE DISCLOSURE LANGUAGE (PIPELINE ONLY)

This game was developed using AI tools in our internal production pipeline. No AI-generated content appears in the shipped game. AI tools were used for [e.g. 'code assistance, internal documentation, and QA tooling'].

8. Team Member Responsibilities

8.1 All Team Members

- Use only approved AI tools on production work unless prior written approval is obtained
- Do not enter studio trade secrets, unreleased game content, or personally identifiable information into public AI tools
- Log all production-adjacent AI use in the AI Use Log before work begins
- Flag any AI-generated asset that could be mistaken for a final asset to the QA Lead
- Report any suspected AI-generated content in third-party assets or contractor deliverables to the Policy Owner

8.2 Leads and Supervisors

- Review AI Use Log entries for their team at least weekly during active development
- Ensure team members have completed any required orientation on this policy before using AI tools on studio projects
- Escalate any uncertainty about AI use classification to the Policy Owner before proceeding

8.3 Contractors and Outsource Partners

The studio requires all contractors and outsource partners working on studio projects to:

- Disclose any AI tool use in their deliverables at the time of delivery
- Represent that deliverables do not contain AI-generated content unless explicitly agreed and documented in the contract
- Obtain studio approval before using any generative AI tool on studio-related work

CONTRACT LANGUAGE RECOMMENDATION

Add the following to all contractor and outsource agreements: 'Contractor represents and warrants that no generative AI tools were used in the creation of deliverables unless disclosed in writing and approved by Studio prior to use. Contractor shall indemnify Studio against any claims arising from undisclosed AI use in deliverables.' Have legal review this language before use.

9. Data Security and Confidentiality

Generative AI tools, particularly cloud-based consumer tools, may retain input data for model training or logging. The following content must not be entered into any AI tool without explicit authorization from the Policy Owner and confirmation that the tool's data handling terms permit it:

- Unreleased game content, including story, characters, mechanics, and assets
- Studio financial information, contracts, or deal terms
- Personally identifiable information about employees, contractors, or players
- Source code for unreleased features or proprietary engine modifications
- Voice recordings or biometric data from performers or employees

9.1 Approved Enterprise Tools

Some AI tool providers offer enterprise agreements with data isolation and no-training guarantees. The studio's Approved Tools Register (Appendix A) should indicate which tools have enterprise data terms and which do not. Team members should use enterprise-tier tools for any work involving sensitive content.

Enterprise AI Tools with Data Isolation	<i>[List approved enterprise tools here]</i>
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10. Recordkeeping

The studio maintains an AI Use Log for each active project. The log is maintained by the QA Lead and reviewed by the Policy Owner at each milestone review.

10.1 Required Log Entries

Each entry in the AI Use Log must include:

- Date of use
- Team member name
- Tool and version used
- Task description and asset identifier (if applicable)
- Tier classification (player-facing or pipeline-only)
- Approval obtained from (name and date)
- Review outcome and reviewer name
- Whether the output was used in a shipped build (yes / no / modified)

Log entries for shipped assets must be retained for a minimum of three years after the game's release. This documentation may be required to demonstrate human authorship in IP disputes or respond to platform policy inquiries.

WHY LOG RETENTION MATTERS

If an IP dispute arises over AI-generated content, the studio's ability to demonstrate the extent of human creative direction over that content may determine whether copyright protection exists. The March 2025 US Copyright Office guidance confirms that human authorship, not just human review, is required for copyright eligibility. Documentation of the prompting, selection, and editing process is your evidence.

11. Policy Violations

Violations of this policy may include: using non-approved AI tools on production work, failing to log AI use, shipping AI-generated content without the required approval, or misrepresenting AI use to a platform or awards body. The studio treats these seriously because the consequences, reputational and legal, fall on the entire team, not just the individual.

11.1 Reporting

Any team member who discovers a potential policy violation, including AI-generated content in a third-party deliverable, should report it to the Policy Owner immediately. Reports made in good faith will not result in negative consequences for the reporter.

11.2 Remediation

When a violation is discovered before ship: the content is removed, reviewed, and either replaced or properly approved before the build proceeds. When a violation is discovered after ship: the Policy Owner, QA Lead, and legal contact are notified within 24 hours. The studio's response will include an assessment of disclosure obligations and, where appropriate, proactive communication to the platform and players.

PRECEDENT FROM PEARL ABYSS (CRIMSON DESERT, 2026)

After players identified AI-generated paintings in Crimson Desert within 24 hours of launch, Pearl Abyss issued a public apology, committed to a full asset audit, and retroactively added the required Steam AI disclosure. The studio acknowledged it should have disclosed at launch. Proactive disclosure before ship is significantly less damaging than reactive disclosure after players have already found it.

12. Policy Review and Updates

This policy will be reviewed every six months, or earlier if any of the following occur:

- A material change in platform disclosure requirements
- A material change in applicable law, including SAG-AFTRA agreement terms, US copyright guidance, or EU AI Act enforcement
- A studio AI incident (internal violation or post-ship discovery)
- A significant change in the AI tools available or in use at the studio

Next Scheduled Review	[Date]
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Review Conducted By	[Name(s), Role(s)]
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Changes to this policy are tracked in the version history below. All team members will be notified of material changes within five business days of adoption.

Version	Date	Changed By	Summary of Changes
1.0	[Date]	[Name]	Initial adoption

Appendix A: Approved Tools Register

Complete this register before the policy takes effect. Review and update at least every six months. Each tool entry should be approved by the Policy Owner before team members begin using it.

Tool / Vendor	Category	Tier	Approved Uses	Restrictions

Appendix B: AI Use Log Template

Maintain one log per project. Each row represents one instance of AI tool use. Logs for shipped assets are retained for a minimum of three years post-release.

Date	Team Member	Tool + Version	Task Description	Asset ID	Tier	Approval (Name + Date)	Reviewer (Name + Date)	In Shipped Build?

Log maintained by: [QA Lead name] | Project: [Project name] | Last updated: [Date]

Appendix C: Quick Reference

Before Using Any AI Tool on a Studio Project

- Is the tool on the Approved Tools Register? If not, get written approval first.
- Is this player-facing or pipeline-only?
- Have I logged this in the AI Use Log?

- Have I obtained the correct tier approval?
- Am I entering any confidential or sensitive content into this tool?

Before Any Build Goes to Cert or Goes Gold

- Has the QA Lead signed off that no placeholder assets remain?
- Has every AI-generated player-facing asset been reviewed and documented?
- Has the Steam disclosure been updated to reflect AI use accurately?
- Has legal been notified of any AI voice use involving union or contracted talent?
- Has the Policy Owner signed off?

If You Discover Undisclosed AI Content After Ship

- Notify the Policy Owner within 24 hours
- Do not make public statements until the Policy Owner and legal have been consulted
- Assess disclosure obligations for each platform where the game is available
- Proactive disclosure to the platform and, where appropriate, to players is strongly preferred over waiting for community discovery

THE CORE RULE

If AI was used to create something that players will see, hear, or interact with, that use must be logged, approved, verified by a human reviewer, and disclosed on any platform that requires it. If you are not sure whether this applies to what you are doing, ask the Policy Owner before proceeding, not after.

LEGAL DISCLAIMER

This template is provided for informational purposes only and does not constitute legal advice. It is based on publicly available information about platform policies, union agreements, and published legal guidance as of mid-2026. Laws, platform policies, and union agreements change. This document must be reviewed by qualified legal counsel familiar with your studio's jurisdiction, distribution platforms, and workforce composition before formal adoption.

Sources informing this template include: Odin Law AI Governance Guide (2025); Bird & Bird EU AI Act Gaming Guide (2025); Clyde & Co AI in Gaming analysis (2025); SAG-AFTRA Interactive Media Agreement (2025); US Copyright Office AI Guidance (March 2025); Steam AI Disclosure Policy (updated January 2026); documented studio incidents including Crimson Desert / Pearl Abyss, Clair Obscur / Sandfall Interactive, The Alters / 11 Bit Studios, and Arc Raiders / Embark Studios.

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