

Steam's new adult content policy, which restricts "certain kinds of adult only content" based on the rules of payment processors and other third-party entities, is primarily driven by the **dominant influence of these financial institutions**. These processors, including Visa, Mastercard, and PayPal, wield "veto power" due to concerns about **high chargeback rates, fraud, and reputational damage** associated with adult content. This policy change reflects Steam's effort to **mitigate financial and operational risks** by aligning with the often opaque and stringent standards of its essential service providers, rather than a direct response to specific new laws or overt pressure from religious or conservative groups targeting adult games specifically.

Steam's New Adult Content Policy: An Analysis of Payment Processor Influence and Regulatory Pressures

1. Overview of Steam's Policy Change

1.1. Introduction of New Rule Targeting "Certain Kinds of Adult Only Content"

Valve Corporation, the operator of the **Steam digital distribution platform**, recently updated its Steamworks onboarding documentation for game developers, introducing a significant new rule that explicitly addresses "**certain kinds of adult only content**". This change, identified around mid-July 2025, adds a **15th clause** to the "What you shouldn't publish on Steam" section. The rule prohibits "Content that may violate the rules and standards set forth by Steam's payment processors and related card networks and banks, or internet network providers. In particular, certain kinds of adult only content". This marks a **pivotal shift** from Steam's previously more permissive stance, which, since 2018, generally allowed mature games provided they were legally compliant and appropriately labeled and age-gated. The **vagueness of "certain kinds of adult only content"** has caused considerable uncertainty and concern among developers, as Valve has not provided specific examples or further clarification on what material might fall under this category. The introduction of this rule coincided with the **removal of numerous adult-themed games** from the Steam store, many of which reportedly contained themes such as **incest, slavery, or prison imagery**, suggesting an immediate enforcement of the updated policy.

The timing of this policy update and its swift enforcement through game removals indicate a **proactive measure by Valve to align its platform's content with external pressures, primarily from financial institutions**. The lack of detailed guidance from Valve means developers are left to interpret the "rules and standards" of these third-

party entities, which are often not publicly disclosed or can be difficult to define . This move effectively **delegates a degree of content moderation authority from Valve to its payment processors and other financial partners**. The new rule joins existing prohibitions against hate speech, child exploitation, and malware, among others . The core issue for developers is the ambiguity: while Valve's own content policies were already complex, this new layer, dictated by external financial entities, introduces a **new level of unpredictability**. The focus on "adult only content" indicates a targeted effort, likely in response to specific concerns raised by these payment processors regarding the types of adult material they are willing to facilitate transactions for, even if such material is legal or educational .

1.2. Explicit Mention of Payment Processor, Card Network, Bank, and Internet Network Provider Rules

The newly introduced clause in Steam's onboarding documentation is remarkable for its **explicit deference to the "rules and standards" of several categories of external entities**: "Steam's payment processors and related card networks and banks, or internet network providers" . This specific wording broadens the scope of potential content regulation beyond what might be typically expected from a platform's own terms of service. By naming these entities, Valve is transparently acknowledging that its content policies are now, at least in part, **shaped by the contractual obligations and risk management strategies of these third parties**. The inclusion of "payment processors" directly implicates companies like **Visa, MasterCard, and PayPal**, which are known to have stringent policies regarding adult content and other high-risk merchant categories . The reference to "related card networks and banks" suggests that the policies of the financial institutions that issue credit and debit cards, as well as those that facilitate the settlement of these transactions, also play a crucial role. This could encompass a wide array of global and regional banks and financial service providers that form the backbone of electronic payments.

Furthermore, the mention of "**internet network providers**" introduces another layer of complexity, as this category is less clearly defined in the context of content moderation . This could refer to major Internet Service Providers (ISPs) or telecommunications companies that provide the underlying network infrastructure. While their direct role in dictating content policies for platforms like Steam is less commonly discussed compared to payment processors, their inclusion suggests that network-level concerns or pressures might also be influencing Steam's policy adjustments. The collective impact of these external "rules and standards" is a **significant reduction in Valve's**

autonomy over its content decisions, particularly concerning "certain kinds of adult only content" . This explicit linkage means that any changes or tightening of policies by these external entities can directly translate into new restrictions on the Steam platform, often without clear, prior communication to developers about the specific nature of these external rules. The **opacity of these third-party standards is a major point of concern**, as developers are left to guess what might trigger a violation . This move effectively makes these external companies **co-arbiters of what is permissible** on one of the world's largest gaming platforms.

2. Identification of Key Influencing Entities (Step 1)

2.1. Steam's Listed Payment Processors (Visa, MasterCard, PayPal, etc.)

Steam's platform relies on a variety of payment processors to facilitate transactions for its global user base. The user's initial context lists several key payment processors integrated with Steam. These include:

- **PayPal**: A widely used online payment system.
- **WebMoney**: A Russian payment processing system.
- **PaySafeCard**: A European-based prepaid online payment method.
- **MasterCard**: A major global card network.
- **Visa**: Another major global card network.
- **JCB (Japan Credit Bureau)**: A card network based in Japan, widely accepted in Asia.
- **Skrill**: A digital wallet and online payment system.
- **Trustly**: A Swedish payment method that allows for direct bank-to-bank payments.

These processors are explicitly mentioned in the context of Steam's new policy, which defers to their "rules and standards" regarding acceptable content, particularly adult content . The influence of these payment processors is significant because if they decide to cease processing payments for Steam due to content-related issues, it would **severely impact Steam's ability to conduct business**. This leverage has been demonstrated in other contexts, such as with platforms like Pornhub and OnlyFans, where payment processors have forced changes to content policies . The new Steam rule effectively acknowledges this power dynamic, with Valve proactively adjusting its content guidelines to align with the expectations of these financial partners to avoid

potential disruptions . The specific internal policies of each of these processors regarding adult content are not always publicly disclosed in detail, which contributes to the ambiguity faced by developers . However, it is clear that companies like **Visa, MasterCard, and PayPal have a history of imposing restrictions on adult-oriented businesses**, often citing concerns about illegal content, brand reputation, and the risk of chargebacks or fraud .

2.2. "Related Card Networks and Banks" (Implied as financial institutions linked to payment processing)

The term "**related card networks and banks**" in Steam's updated policy refers to the broader financial ecosystem that supports electronic payments . This encompasses not just the primary payment processors like PayPal or Skrill, but also the **major card networks such as Visa, MasterCard, American Express, Discover, and JCB**, which provide the infrastructure for credit and debit card transactions. Furthermore, "banks" in this context likely refers to both the **issuing banks** (the financial institutions that provide customers with payment cards) and **acquiring banks** (the banks that process card payments on behalf of merchants like Steam). These entities collectively establish the rules and standards governing payment card transactions, including provisions related to prohibited activities and merchant categories. Their influence is substantial because they can refuse service or impose strict conditions on merchants dealing with content they deem high-risk or objectionable, such as certain types of adult material .

The rules set by these card networks and banks are often part of their merchant agreements and operational regulations, which are designed to manage risk, prevent fraud, and comply with legal and regulatory requirements. For instance, **Mastercard has implemented "Specialty Merchant Registration requirements"** for sellers of adult content, mandating that banks certify these merchants have effective controls to monitor and remove illegal content . This places a significant burden on platforms hosting adult content to ensure robust content moderation, as failure to comply can lead to the loss of payment processing capabilities. The reference to "related card networks and banks" in Steam's policy underscores the extent to which these financial institutions can dictate terms to online platforms, effectively acting as **gatekeepers for what content can be monetized** through mainstream payment channels . The global nature of Steam's operations means it must navigate the policies of an international network of financial institutions, which can vary but often align on restricting high-risk categories like adult entertainment .

2.3. "Internet Network Providers" (Less clearly defined, likely major ISPs or telecom companies)

The inclusion of "**internet network providers**" in Steam's new content policy clause is less clearly defined compared to payment processors and financial institutions, but it likely refers to **major Internet Service Providers (ISPs) and telecommunications companies** that provide the essential connectivity and infrastructure for internet services . These providers could potentially influence content availability through their terms of service or by complying with governmental requests or regulations related to content blocking or filtering. While direct evidence of ISPs pressuring Steam on adult game content is not explicitly detailed in the provided search results, their inclusion in the policy suggests Valve is attempting to cover all bases regarding third-party entities whose services are critical to Steam's operation and who might have rules affecting content distribution.

The role of internet network providers in content moderation is complex. In some jurisdictions, ISPs may be legally obligated to block access to certain types of content deemed illegal or harmful. They also have their own acceptable use policies that users and, by extension, platforms like Steam must adhere to. While it's less common for ISPs to directly dictate content policies to platforms in the same way payment processors do, their potential influence cannot be entirely dismissed, especially in regions with strict internet censorship or where ISPs have significant market power. The vagueness of "internet network providers" in Steam's policy might be a **preemptive measure to ensure compliance with any future demands or restrictions imposed by these entities**, or it could be a reflection of existing, less publicized pressures. The primary concern with payment processors appears to be more immediate and well-documented, but the mention of network providers indicates a broader strategy by Valve to mitigate risks from all critical service partners . The lack of specific examples of ISP influence on Steam's adult content in the provided information makes it difficult to assess the direct impact of this part of the clause, but it contributes to the overall uncertainty for developers.

3. The Elusive Specific Agreements (Step 2)

3.1. Lack of Publicly Available Direct Agreements Between Steam and Partners on Adult Content

A significant challenge in fully understanding the implications of Steam's new policy is the **lack of publicly available, specific agreements or contracts between Valve**

(Steam's operator) and its payment processors, related card networks, banks, or internet network providers that explicitly detail the "rules and standards" pertaining to "certain kinds of adult only content" . While Steam's updated guidelines clearly state that content violating these external rules is prohibited, the actual text of these third-party agreements or the specific clauses related to adult content moderation are not disclosed to the public or, in many cases, even to the developers publishing on Steam . This opacity creates a considerable degree of uncertainty for game developers, who are now expected to comply with a set of rules that are not transparently available for review. The search results consistently highlight this vagueness as a primary concern, with developers and commentators noting that it is difficult to adhere to rules that are not clearly defined or accessible .

The Steam Subscriber Agreement and Steamworks Documentation, while outlining Steam's own policies, do not typically reproduce the full terms of its agreements with these external partners . Instead, the new clause acts as a blanket reference, indicating that compliance with these undisclosed external standards is a condition for publishing on Steam. This situation is not unique to Steam; many platforms that rely on third-party payment processors face similar constraints, where the detailed merchant agreements and acceptable use policies of these financial entities are often proprietary and subject to change without direct public notification . The lack of direct access to these agreements means that developers must often rely on indirect information, such as public statements from payment processors, past enforcement actions against other platforms, or anecdotal evidence from other developers, to infer what might be considered a violation. This makes proactive compliance a challenging endeavor and increases the risk of unexpected content removal or account penalties based on standards that were not clearly communicated or understood. The primary source of information, therefore, becomes the enforcement actions themselves, such as the recent delisting of games with themes like incest, which provide some clues but not a comprehensive or definitive set of rules .

3.2. Evidence of Payment Processors' Own Policies on Prohibited Adult Content (e.g., Visa's Stance on CSAM, Bestiality, Non-consensual Acts)

While direct agreements between Steam and its partners regarding adult content are not publicly available, the individual policies of major payment processors like Visa offer significant insight into the types of content likely to be restricted. Visa, for example, has publicly documented its stance on prohibited adult content. The "**Visa Payment Facilitator and Marketplace Risk Guide**" explicitly states that, in addition to

complying with prohibitions in the buyer and seller's jurisdiction, "Visa prohibits the purchase or trade of certain photographs, video imagery, computer-generated images, cartoons, simulation or any other media or activities. This includes but is not limited to **CSAM [Child Sexual Abuse Material], bestiality, rape (or any other non-consensual sexual conduct), or non-consensual mutilation of a person or body part**". This policy provides a clear indication of the types of extreme and illegal content that Visa aims to prevent from being transacted on its network. The emphasis on "non-consensual sexual conduct" is particularly relevant, as it suggests that depictions of non-consensual acts, even if simulated or fictional (as in a video game), could fall under Visa's prohibitions.

Furthermore, Visa's "Core Rules and Visa Product and Service Rules" document outlines requirements for merchant agreements, including that merchants must not knowingly submit any transaction that is illegal or that they should have known was illegal. For merchants categorized under **MCC 5967 (Adult Content and Services)**, there are additional provisions specified in the Visa Integrity Risk Program Guide that must be included in their agreements with acquirers. While the full details of this program guide are not provided in the snippet, its existence underscores the heightened scrutiny and specific requirements placed on merchants dealing in adult content. The CEO of Visa Japan also commented on the company's policy, stating that while Visa aims to make legal and legitimate purchases available, it is "sometimes necessary to deny use to protect the brand," particularly concerning adult content that is legal in Japan but still deemed problematic by Visa. This indicates a global policy framework from Visa that prioritizes brand protection and risk mitigation, which can lead to restrictions on content even if it is legal in a specific local jurisdiction. These publicly available Visa policies strongly suggest that Steam's new rule is, in part, a response to such clear prohibitions from its key payment partners, aiming to prevent its platform from being used to facilitate transactions for content that these processors explicitly forbid.

3.3. Mastercard's Stricter Rules for Adult Content Merchants (Age Verification, Consent Documentation)

Mastercard has also implemented, and continues to update, **stringent rules and requirements for merchants operating in the adult content space**, which significantly influence platforms like Steam. In April 2021, Mastercard issued an updated set of standards titled "AN 5196 Revised Standards for New Specialty Merchant Registration Requirements for Adult Content Merchants". These standards aim to prevent the

distribution of illegal adult content across its network, with a strong focus on **age verification of content producers, pre-screening and verification of content, and robust content removal processes** . Key requirements outlined in these standards include: merchants must enter into a written agreement with each content provider; content providers must verify the identity and age of all persons depicted in the content to ensure they are adults and be able to provide supporting documents upon request; and content providers must obtain and keep on record written consent from all persons depicted . This emphasis on documented consent and age verification is a critical aspect of Mastercard's approach to mitigating risk and ensuring legal compliance within the adult content industry.

The Patreon support page, which details payment processor requirements for adult/18+ creators, explicitly references Mastercard and Visa as having implemented these two new core requirements: **Age Verification and Consent Documentation** . This indicates that these are not merely internal Mastercard policies but are actively being enforced on platforms that host adult content and use Mastercard for payment processing. Mastercard's rules further stipulate that merchants must only permit content uploads from verified content providers and must have a robust process for verifying the age and identity of these providers . Crucially, all uploaded content must be reviewed *before* publication to ensure it is not illegal and does not violate Mastercard's standards . This pre-screening requirement represents a significant operational burden for platforms. Additionally, merchants are prohibited from marketing their websites or permitting search terms that suggest the content contains child exploitation materials or depicts non-consensual activities . They must also support a complaint process for reporting illegal or policy-violating content and offer an appeal process for individuals depicted in content to request its removal . These comprehensive and strict rules from Mastercard provide a clear framework for the types of "rules and standards" that Steam's new policy likely refers to, compelling Valve to implement more rigorous content controls to maintain its ability to process Mastercard payments.

3.4. PayPal's Acceptable Use Policy Restrictions on Sexually Oriented Digital Content

PayPal, another major payment processor for Steam, maintains an "**Acceptable Use Policy**" (AUP) that places significant restrictions on transactions involving sexually oriented goods and services, particularly digital content . According to PayPal's policy, while they permit U.S.-only transactions for certain sexually oriented *physical* goods that are physically delivered to the customer (like videos, DVDs, and magazines), they explicitly do *not* permit PayPal account holders to buy or sell "**sexually oriented digital**

goods or content delivered through a digital medium" . This prohibition on digital adult content is a critical point for a platform like Steam, which primarily distributes digital games. Examples of such prohibited digital goods include downloadable pictures or videos and website subscriptions . This policy effectively means that any adult game distributed digitally via Steam, if purchased using PayPal, could potentially fall foul of PayPal's AUP.

Furthermore, PayPal's AUP also prohibits sexually oriented goods or services that involve, or appear to involve, minors, and services whose purpose is to facilitate meetings for sexually oriented activities . In its AUP, "Mature Audience Content" is listed under "Activities Requiring Approval," defined as "Any adult content delivered digitally including video on demand (VOD) and web-cam activities," and notes that "PayPal may be restricted from processing payments in certain jurisdictions for adult DVD's, magazines and other adult themed products or services" . This implies that even if some forms of adult content might be permissible under strict conditions, digital delivery often faces higher scrutiny or outright prohibition. PayPal states that in deciding what sexually oriented goods and services to allow, it considers factors such as regulations or restrictions on the product, its classification by a recognized ratings board, whether it describes or depicts sexual conduct in a "patently offensive way," the dominant theme of the material, its literary, artistic, political, or scientific value, potential medicinal or educational uses, and its impact on customer safety . The vagueness of terms like "patently offensive way" and the broad discretion afforded to PayPal in interpreting these factors contribute to the uncertainty faced by platforms and content creators. Historical context also shows PayPal has taken action against erotic content in the past; for instance, in 2012, PayPal contacted independent e-book publishers, threatening account deactivation if they sold erotic material depicting incest, pseudo-incest, rape fantasies, bestiality, or BDSM, leading many publishers to remove such works . This history, combined with its current AUP, underscores why Steam would need to consider PayPal's policies in its own content moderation strategy.

4. Analysis of Reasons Behind the Policy Change (Step 3)

4.1. Dominant Influence of Payment Processors

4.1.1. "Veto Power" Over Content Deemed High-Risk for Chargebacks and Fraud

The primary and most consistently cited reason for Steam's new adult content policy is the **dominant influence of payment processors, who effectively hold "veto power"** over the types of content that can be monetized on online platforms . Adult content,

particularly certain extreme or controversial subgenres, is often categorized as "**high-risk**" by financial institutions . This high-risk designation stems from several factors, including significantly **elevated chargeback rates** and a higher propensity for **fraudulent transactions** compared to other industries . Chargebacks can occur for various reasons in the adult industry: customers may dispute transactions due to buyer's remorse, embarrassment, or claims of unauthorized use of their payment method ("friendly fraud") . Fraudulent activities, such as the use of stolen credit card information to purchase adult content or subscriptions, are also prevalent . These issues translate into direct financial losses and increased operational burdens for payment processors and the acquiring banks that work with them. Consequently, payment processors like Visa, Mastercard, and PayPal impose strict guidelines and may refuse service to merchants or platforms that they perceive as inadequately managing these risks . For a platform like Steam, which relies heavily on these payment processors for its global transaction volume, **losing access to major payment networks would be catastrophic** for its business model . Therefore, compliance with their often stringent and opaque standards becomes a non-negotiable aspect of Steam's operations, compelling Valve to proactively adjust its content guidelines to align with the expectations of these financial partners.

4.1.2. Prioritization of Brand Reputation and Risk Mitigation by Payment Processors

Payment processors like Visa, Mastercard, and PayPal **prioritize the protection of their brand reputation and the mitigation of various risks** above all else. This is a fundamental aspect of their business model, as their credibility and trustworthiness are essential for maintaining their vast networks of users, merchants, and financial partners. Adult content, by its very nature, can be controversial and is often associated with societal stigma, even when the content itself is legal. Payment processors are acutely aware that any association with illegal, exploitative, or even just "unsavory" content can lead to **significant reputational damage**, public backlash, and loss of consumer confidence. This concern is not unfounded, as evidenced by past incidents where platforms hosting adult content faced intense scrutiny and pressure due to allegations of illegal material, leading to payment processors severing ties . To safeguard their brands, these financial institutions implement **stringent risk management protocols** that often involve categorizing adult content merchants as "high-risk." This categorization triggers more rigorous due diligence, higher processing fees, and, crucially, a lower tolerance for any content that might be perceived as problematic. The decision-making process for payment processors is heavily influenced by this risk-averse stance, leading them to prefer caution and sometimes

over-regulation rather than risk any negative association. This corporate imperative to protect their image and minimize exposure to legal, financial, and ethical risks is a powerful driver behind the content restrictions that platforms like Steam are now compelled to enforce.

4.1.3. Historical Precedents (e.g., Pornhub, OnlyFans) of Payment Processor Intervention

The influence of payment processors on content policies is not a new phenomenon, and **historical precedents clearly demonstrate their willingness to intervene** when they perceive a platform's content as posing a risk. The most prominent example is the **Pornhub incident in 2020**, where major payment processors like Visa and Mastercard suspended services to the platform following allegations that it hosted child sexual abuse material (CSAM) and non-consensual intimate images (NCII) . This action, largely driven by a New York Times op-ed and subsequent public pressure, had a seismic impact on Pornhub, forcing it to purge all unverified content and implement much stricter content moderation policies. This event served as a stark warning to other platforms hosting user-generated or adult content about the **power payment processors wield and their readiness to use it** to enforce their standards. Similarly, platforms like **OnlyFans and Patreon** have also faced pressure from payment processors regarding the types of adult content they allow, sometimes leading to policy changes or the removal of certain creators or content categories . These instances highlight a pattern: when payment processors deem a platform's content to be too risky, either due to illegality, potential for harm, or simply reputational concerns, they can and do exert significant pressure, often by threatening to withdraw essential payment processing services. These historical precedents undoubtedly inform Steam's decision-making, making a proactive approach to content moderation, aligned with payment processor expectations, a strategic imperative to avoid similar disruptions.

4.2. The Role of "Definitional Creep" and Moral Ordering by Payment Processors

The recent policy changes by Steam, particularly the introduction of a rule targeting "certain kinds of adult only content" based on the standards of payment processors and related financial institutions, can be significantly understood through the lens of **"definitional creep" and the "moral ordering" of sexual content** by these intermediaries . This phenomenon, as detailed in academic research, describes how payment processors, primarily Visa and Mastercard, have increasingly assumed the role of arbiters of acceptable online sexual expression, extending their influence far beyond mere financial transaction facilitation . Their policies, while ostensibly aimed at

combating illegal content such as Child Sexual Abuse Material (CSAM) and non-consensual intimate images (NCII), have evolved to encompass a broader, often ambiguously defined, range of "objectionable" or "harmful" content. This expansion is not solely driven by legal mandates but is significantly shaped by the payment processors' desire to **mitigate reputational risk and align with certain moral or ethical standpoints**, often influenced by external pressure groups. The power wielded by these financial gatekeepers is substantial; by threatening to withdraw services, they can effectively dictate content moderation policies on platforms like Steam, leading to a cautious and often over-broad application of restrictions to avoid potential conflicts or loss of essential payment processing capabilities. This dynamic creates a situation where the definitions of what constitutes "harmful" or "unacceptable" content are not static but are subject to a gradual expansion or "creep," as platforms err on the side of caution to remain compliant with the often-vague guidelines set forth by these powerful financial entities.

4.2.1. Payment Processors Acting as De Facto Moral Gatekeepers

Payment processors, notably **Visa and Mastercard**, have effectively positioned **themselves as de facto moral gatekeepers** in the digital realm, particularly concerning adult and sexual content. This role extends beyond their primary function of facilitating financial transactions and ventures into the domain of content regulation and moral judgment. The research by Webber and Franco (2024) highlights that these credit card networks have established broad rules for the moderation and verification of adult content. These rules are motivated by a combination of factors, including the **reputational risk associated with being linked to adult content** and the legal liabilities that could arise from processing payments for illegal material. However, the influence of these processors is not confined to merely preventing illegal activities. The study points out that in the development of these rules, legitimate concerns about preventing CSAM and NCII have become intertwined with broader anti-pornography sentiments. This entanglement allows payment processors to impose standards that may reflect a particular moral or ethical viewpoint, rather than a strictly legal one. For instance, the pressure exerted by groups aiming to abolish pornography and sex work has led to conflating all pornography with illegal activities like CSAM, prompting credit card networks to restrict financial services to adult platforms. This gatekeeping power means that platforms like Steam must adhere to these often subjective and far-reaching standards to maintain access to essential payment processing services, effectively **outsourcing moral and ethical content decisions to these financial institutions**. The case of Pornhub in 2020, where Visa and Mastercard revoked its

processing services following a New York Times op-ed and public pressure, exemplifies this power dynamic and its immediate, severe consequences .

The mechanisms through which payment processors enforce this moral gatekeeping are multifaceted. They establish detailed guidelines for adult content merchants, which often go beyond existing legal requirements. For example, **Mastercard introduced updated global requirements for adult content merchants** following the Pornhub incident, with Visa following suit in 2022 . These rules typically mandate stringent age and identity verification processes for performers, as well as systems for ensuring and documenting consent for each piece of content. While the stated goal is to prevent non-consensual and illegal material, the practical effect can be an **over-moderation of content**, as platforms interpret these vague guidelines broadly to ensure compliance and avoid the risk of losing payment services. The research by Webber and Franco (2024) notes that these tightened rules focus on verifying that content is created and uploaded by consenting adults and on ensuring swift removal of offending content. However, the definition of "offending content" can be subject to the payment processors' interpretations, which may be influenced by prevailing moral panics or campaigns by advocacy groups. This positions payment processors not just as financial intermediaries but as powerful entities shaping the boundaries of permissible sexual expression online, often without transparent processes or clear, consistently applied definitions, leading to what the researchers term a **"definitional creep"** where more and more content is labeled as "non-consensual," "objectionable," or "harmful" .

4.2.2. Expansion of "Harmful" Content Definitions Based on Corporate Interests and Optics

The definition of what constitutes **"harmful" content**, particularly in the context of adult material, has undergone a significant expansion, largely driven by the **corporate interests and reputational optics of payment processors** like Visa and Mastercard . While the initial impetus for stricter regulations often stems from legitimate concerns about illegal content such as CSAM and NCII, the scope of these regulations tends to broaden over time. This **"definitional creep"** occurs as payment processors, motivated by a desire to protect their brand image and avoid association with any content that could be perceived as controversial or morally questionable, impose increasingly stringent and often vaguely worded guidelines on platforms that host adult content. The research by Webber and Franco (2024) indicates that campaigns led by groups with explicit goals to abolish pornography and sex work have been successful in pressuring credit card networks by conflating all adult content with illegal and exploitative material

. This pressure creates a situation where payment processors, to safeguard their reputation and avoid public backlash, err on the side of over-caution, leading to the categorization of a wider array of legal adult content as "harmful" or "objectionable." The Pornhub incident in 2020, where Visa and Mastercard ceased services after allegations of CSAM on the platform, served as a stark reminder to the industry of the power these financial institutions wield and their willingness to act decisively to protect their corporate image, even if it means adopting a broad-brush approach to content moderation .

This expansion of "harmful" content definitions is not always based on clear, objective criteria or legal mandates but is often influenced by subjective interpretations of morality and risk. Payment processors, in their role as financial gatekeepers, are primarily concerned with minimizing financial and reputational risk. Consequently, their policies may reflect a conservative stance on sexual content, aligning with what they perceive as mainstream societal values or the demands of vocal advocacy groups. The study by Webber and Franco (2024) notes that legitimate concerns about CSAM and NCII have become entangled with anti-pornography interests, leading to adult platforms being disproportionately targeted as uniquely responsible for hosting non-consensual content, even though content moderation challenges are present across all types of user-generated content platforms . This disproportionate focus, coupled with the vague language often found in payment processor policies, allows for a flexible interpretation of what is considered "harmful." Platforms like Steam, in turn, must anticipate these interpretations and may adopt even stricter internal guidelines to avoid running afoul of their payment processors. This results in a **chilling effect on certain types of adult content**, even if legally permissible, as the financial imperative to maintain payment processing capabilities outweighs other considerations. The "definitional creep" thus becomes a self-perpetuating cycle, where platforms, to ensure compliance with broad and often opaque standards, may preemptively restrict content, further narrowing the scope of acceptable sexual expression online.

4.2.3. Prioritization of Depicted Consent Over Actual Performer Consent in Some Cases

A significant aspect of the moral ordering imposed by payment processors involves the verification of consent, but this process can sometimes **prioritize the *depiction of consent within the content itself over the actual consent and well-being of the performers involved*** . The updated rules from Visa and Mastercard place a strong emphasis on platforms having robust systems to verify the age, identity, and consent of

performers for each piece of content. This includes requirements for platforms to obtain and maintain age and consent documentation, often referred to as '2257' paperwork in the US, which has long been a standard in the industry. However, the new guidelines compel platforms to implement additional, often more intrusive, verification measures. For instance, OnlyFans requires current identification for performers even if their previous ID documents expired after filming content, and some platforms like Streamate mandate biometric liveness checks to match a performer's face to their ID on record . While these measures aim to ensure that performers are of legal age and have consented to the creation of the content, the focus within the content moderation guidelines can sometimes shift towards **how consent is portrayed within the scene**, rather than solely on the documented, off-camera consent of the individuals involved. This can lead to situations where content is flagged or removed not because the performer did not consent to its creation, but because the *depiction* of the sexual act within the content does not align with the payment processors' often conservative or specific interpretations of "consensual" behavior.

The emphasis on depicted consent can lead to the **over-moderation of certain genres or themes within adult content**, even if all performers have willingly participated and provided documented consent. For example, scenarios involving power dynamics, BDSM, or certain role-playing themes might be scrutinized more heavily if the *portrayal* of consent within the fictional narrative does not meet a specific, often narrow, standard set by or inferred from payment processor guidelines. This is part of the "definitional creep" where content that is legal and involves consenting adults can still be deemed "objectionable" or "harmful" based on its thematic elements or how consent is visually or narratively represented. The research by Webber and Franco (2024) suggests that platforms, in an effort to remain compliant with these vague and broadly interpreted guidelines, may over-moderate content . This means that performers who have genuinely consented to participate in certain types of adult content might find their work restricted or removed not due to any actual lack of consent on their part, but because the content itself is perceived by the platform (under pressure from payment processors) as potentially violating rules about "non-consensual" or "objectionable" material. This creates a complex situation where the documented, legal consent of the performer can be overshadowed by the payment processors' and platforms' interpretations of how consent should be depicted within the content to be deemed acceptable, potentially limiting creative expression and the types of adult content that can be commercially viable.

4.3. Impact of Legal and Regulatory Developments

4.3.1. The UK Online Safety Act and its Global Implications for Content Moderation

The **UK Online Safety Act (OSA)**, which received Royal Assent in October 2023, represents a significant piece of legislation with potential global implications for online content moderation, including for platforms like Steam. While the OSA primarily targets "user-to-user" services and search engines, imposing a "duty of care" on them to protect users from illegal content (such as CSAM, terrorism content, and fraud) and content that is harmful to children, its broad definitions and stringent requirements could indirectly influence how platforms approach adult content more generally. The Act requires services to implement systems and processes to mitigate and manage the risk of harm, including through content moderation and age assurance measures. For platforms like Steam that host user-generated content (e.g., game reviews, community forums, and potentially user-created game assets or mods) and distribute games, some aspects of the OSA could be relevant. The Act's emphasis on preventing access to content harmful to children, for example, aligns with the increasing pressure on payment processors and platforms to implement robust age verification and content restriction mechanisms for adult material.

While Steam's new policy explicitly defers to payment processor rules, the broader regulatory environment shaped by laws like the OSA contributes to a climate of increased scrutiny and responsibility for online platforms. The OSA's provisions for **Ofcom (the UK communications regulator) to issue codes of practice and enforce substantial fines for non-compliance** could set a precedent that other jurisdictions might follow, or at least encourage a more proactive approach to content moderation globally as platforms seek to harmonize their policies across different regions. The Act's focus on "legal but harmful" content for adults (though this aspect was significantly amended during its passage) also highlights a trend towards expecting platforms to make more nuanced judgments about content, which can be challenging when dealing with diverse global audiences and legal frameworks. The OSA's requirements for transparency reporting and risk assessments could also push platforms to be more explicit about their content moderation practices, although Steam's current approach with its new adult content rule has been criticized for a lack of transparency regarding the specific standards of its third-party partners. The overall impact of the OSA may be to **reinforce the cautious stance already being adopted by platforms and payment processors** due to other pressures, further incentivizing the removal or restriction of content that could be deemed problematic under such comprehensive regulatory frameworks.

4.3.2. Age Verification and Content Restriction Mandates in Various Jurisdictions (e.g., EU, USA)

Globally, there is an increasing trend towards **mandating age verification and content restriction for online adult content**, a development that significantly impacts platforms like Steam and the payment processors they rely on. In the **European Union**, the **Audiovisual Media Services Directive (AVMSD)** has been revised to extend its scope to video-sharing platforms, imposing obligations to protect minors from harmful content, which includes adult material. While games are not always explicitly covered in the same way as video content, the general direction of EU policy is towards greater online safety and child protection. Furthermore, individual EU member states have been exploring or implementing their own age verification laws for online pornography. For instance, France and Germany have laws requiring age verification for access to adult websites. The **Digital Services Act (DSA)**, another key piece of EU legislation, also imposes obligations on online platforms regarding illegal content and content that is harmful to minors, which could have indirect implications for how adult games are treated.

In the **United States**, there is no federal law mandating age verification for all online adult content, but several states have passed or are considering such legislation. These laws often face legal challenges on First Amendment grounds, creating a complex and evolving legal landscape. However, the **Children's Online Privacy Protection Act (COPPA)** already places strict requirements on websites and online services directed at children under 13, and the Federal Trade Commission (FTC) actively enforces COPPA compliance. Payment processors are also subject to regulations like the **Bank Secrecy Act (BSA)** and anti-money laundering (AML) laws, which require them to implement Know Your Customer (KYC) procedures. While not directly about age verification for content access, these financial regulations contribute to an environment where robust identity verification is becoming more common. The pressure from these various legal and regulatory initiatives, even if not all directly applicable to Steam's primary game distribution model, contributes to the overall climate where **payment processors are keen to ensure platforms have adequate age-gating and content restriction measures** to avoid legal liability and reputational damage. This aligns with the stricter rules imposed by payment processors like Mastercard, which explicitly require age and identity verification for adult content .

4.3.3. Potential Influence of Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) Regulations (e.g., USA PATRIOT Act)

While not directly targeting adult content itself, **Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) regulations** can indirectly influence how payment processors and platforms like Steam approach certain types of transactions and merchant categories, including adult entertainment. In the **United States**, the **USA PATRIOT Act** significantly expanded AML requirements for financial institutions, including payment processors and banks. These regulations mandate robust Customer Due Diligence (CDD) and Know Your Customer (KYC) programs to verify the identity of their customers (both individuals and businesses) and to monitor transactions for suspicious activity. Businesses deemed "high-risk," a category that often includes adult entertainment services due to factors like anonymity, high transaction volumes, and potential for chargeback fraud, may face enhanced scrutiny from financial institutions. Payment processors, in turn, must ensure that the merchants they service are legitimate and not involved in illicit activities that could expose the processor to AML/CTF violations.

This regulatory environment can make payment processors more cautious about working with adult content providers. If a platform like Steam is perceived as having lax controls over the adult content it hosts, or if there are concerns that it could be facilitating transactions for illegal operations (e.g., unlicensed brothels, human trafficking disguised as adult services, or money laundering through virtual goods), payment processors could face regulatory penalties. Therefore, to mitigate these risks, payment processors may impose stricter terms on platforms hosting adult content, requiring them to demonstrate robust content moderation, age verification, and potentially even more stringent KYC checks for developers of adult games. While AML/CTF regulations are not primarily about the moral or ethical nature of adult content, their focus on financial transparency and the prevention of illicit financial flows can contribute to a **more restrictive environment for businesses operating in sectors traditionally viewed as high-risk by financial institutions**, including certain segments of the adult entertainment industry. This adds another layer of complexity for platforms like Steam in managing their relationships with payment processors and ensuring compliance with a web of interconnected financial regulations.

4.4. Influence of External Pressure Groups (Less Directly Evidenced for Adult Games Specifically)

While the primary drivers for Steam's policy change appear to be the direct pressure and requirements from payment processors, the broader context includes the **influence of external pressure groups that target adult content**. These groups often campaign

against pornography and sex work, and their efforts can indirectly or directly impact the policies of financial institutions and, consequently, platforms like Steam. Although direct evidence linking specific recent campaigns by such groups to Steam's *adult game* policy changes is not prominently detailed in the provided information, the **historical precedent of these groups influencing payment processors is well-established**. Payment processors, sensitive to reputational damage and public outcry, may preemptively restrict certain types of content to avoid becoming targets themselves. This creates a situation where the moral judgments or campaigns of activist groups can be amplified through the financial system, leading to a form of **"financial censorship"** where content is restricted not necessarily because it is illegal, but because it is deemed objectionable by these influential third parties. The concern is that this mechanism allows for a bypassing of traditional free speech protections and democratic processes, as unelected corporate entities and pressure groups gain significant control over what content is allowed to exist and be monetized online. While some pressure groups may frame their campaigns in terms of protecting vulnerable individuals or combating illegal content, their actions can have broader chilling effects on legitimate adult content, including adult games that explore complex themes or cater to niche audiences. The vagueness of Steam's new rule, which defers to the "rules and standards" of payment processors and other entities, creates a fertile ground for such influences to take hold, as the specific criteria for what is deemed unacceptable remain opaque and subject to change based on external pressures.

4.4.1. Past Campaigns by Anti-Pornography and Anti-Sex Work Groups Influencing Payment Processors

There is a **documented history of anti-pornography and anti-sex work groups successfully influencing payment processors** to sever ties with adult content platforms. The Sage Journals article mentions a **"Ban/Takedown Campaign" orchestrated by "Campaigns Against Adult Content,"** which specifically targeted payment processors to pressure them into cutting off services for adult platforms. This strategy of "financial deplatforming" has proven effective, as payment processors are highly sensitive to reputational risk and public pressure. The **2020 Pornhub controversy**, which led to Visa and Mastercard suspending services, was significantly amplified by media coverage and advocacy from groups critical of the adult industry, alleging the platform hosted non-consensual content and CSAM. While the focus of these campaigns is often on live-action pornography or sex work, the principles of applying pressure to financial intermediaries can extend to other forms of adult content, including adult games, if these are perceived by such groups as falling under

their purview of "objectionable" material. The success of these past campaigns likely contributes to a cautious approach by payment processors, who may adopt broader restrictions on adult content to preempt potential future campaigns and safeguard their brand image.

The tactics employed by these groups often involve highlighting extreme or illegal content that may exist on a platform (or conflating legal adult content with illegal activities) to create a moral panic and pressure financial institutions to act. Payment processors, in turn, may find it easier to implement blanket restrictions or demand stricter content moderation from platforms rather than engaging in nuanced distinctions between different types of adult content or assessing the actual prevalence of problematic material. This can lead to a situation where the **entire adult content ecosystem, including legal and consensually produced games, faces increased scrutiny and restriction** due to the actions of a vocal minority of campaigners. The new Steam policy, by explicitly deferring to the standards of payment processors, indirectly opens the door for these external pressures to influence what adult games are allowed on the platform, as payment processors will likely err on the side of caution to avoid negative publicity or campaigns targeting their services. The lack of transparency in how payment processors develop their "rules and standards" further obscures the extent to which such external pressures directly shape their policies regarding adult content.

4.4.2. Concerns about "Financial Censorship" and Targeting of LGBTQ+ or "Transgressive" Content

A significant concern arising from Steam's new policy, and the broader trend of payment processors influencing content moderation, is the potential for **"financial censorship" and the disproportionate targeting of LGBTQ+ or other "transgressive" content**. When payment processors, driven by reputational risk or pressure from conservative groups, act as de facto arbiters of acceptable content, they may impose standards that reflect a narrow or traditional moral viewpoint. This can lead to the marginalization or removal of content that, while legal and consensual, challenges mainstream norms or explores themes related to queer identities, kink, or other non-normative sexualities. Commentators and members of the gaming community have expressed fears that what begins as a crackdown on specific, perhaps more extreme or widely condemned adult themes (like the initial removal of incest-themed games on Steam) could easily expand to encompass a broader range of content, including **games with LGBTQ+ themes or those that are simply deemed "too controversial" or**

"unusual" by these financial gatekeepers . The vagueness of Steam's new rule, which references "certain kinds of adult only content" without clear definitions, exacerbates these concerns, as it leaves ample room for subjective interpretations by payment processors and platforms .

The history of content moderation shows that **LGBTQ+ content is often disproportionately flagged or restricted**, even when it is not explicitly sexual or violates no specific rules, simply because it is perceived as "adult" or "controversial" by those enforcing vaguely defined standards . The fear is that payment processors, in their efforts to mitigate risk, might adopt or be pressured into adopting conservative definitions of what constitutes "acceptable" sexual content, thereby silencing or deplatforming queer creators and games that explore diverse sexualities and gender identities. This "financial censorship" is particularly insidious because it operates outside of traditional legal frameworks and democratic oversight, allowing private corporations to effectively regulate speech and artistic expression based on commercial and reputational considerations . The lack of transparency and accountability in how payment processors develop and enforce their content policies makes it difficult to challenge such censorship or to ensure that diverse voices and perspectives are not unfairly targeted. The concern is that Steam, by ceding authority to these entities, is enabling a system where the financial viability of certain types of adult games is determined not by consumer demand or artistic merit, but by the risk-averse moral judgments of banks and payment processors .

4.4.3. Lack of Direct Evidence for Specific Religious or Conservative Groups Pressuring Steam on Adult Games

While the broader influence of anti-pornography and anti-sex work groups on payment processors is acknowledged, the provided information **does not contain direct, specific evidence of recent, targeted campaigns by named religious or conservative political groups specifically pressuring Steam regarding its adult game content** in the immediate lead-up to this particular policy change. The discussions around Steam's new rules focus more on the direct pressure from payment processors themselves, who are acting to protect their brand reputation and mitigate financial risks . The "Ban/Takedown Campaign" by "Campaigns Against Adult Content" mentioned in the Sage Journals article targeted payment processors more broadly, rather than Steam specifically for adult games . While it is plausible that general societal conservatism or the agendas of such groups contribute to the overall climate of caution among payment processors, direct lobbying or public pressure campaigns aimed specifically at

Valve/Steam concerning adult *games* are not explicitly detailed in the provided search results. The primary narrative emerging from the gaming press and community discussions points towards **Valve proactively adjusting its policies to align with the often undisclosed and stringent requirements of its financial partners**, likely to avoid the kind of disruptions faced by platforms like Pornhub or OnlyFans .

However, the absence of direct evidence in the provided snippets does not entirely rule out the influence of such groups. Pressure groups often operate behind the scenes, and their influence on payment processors can be indirect. For example, ResetEra user comments suggest that payment processors might be under pressure from "specific US right wing organizations" or that their boards might have been "ideologically captured" by those wishing to wield power over objectionable content . Another comment mentions "Christofascist puritans" as the type of people looking to ban certain content, cautioning against aligning with their broader agenda, which often includes opposition to LGBTQ+ lifestyles and porn in general . While these are user comments and not direct reports of specific campaigns against Steam's adult games, they reflect a broader concern within the community about the ideological underpinnings of such censorship. The vagueness of Steam's policy and the lack of transparency from payment processors make it difficult to ascertain the precise origins of all pressures, but the general trend of financial deplatforming being used as a tool by moral campaigners is a recognized phenomenon . The focus, however, remains on the payment processors as the immediate and primary external force compelling Steam's policy shift.

4.5. Distinction Between Legal Compliance, Risk Management, and Moral Stances

The reasons behind Steam's new adult content policy are multifaceted, involving a complex interplay between legal obligations, corporate risk management, and the moral or ethical stances of influential third parties, primarily payment processors. It is crucial to distinguish between these drivers to understand the primary motivations for the policy change. While legal compliance is a baseline requirement for any platform, the new Steam rule appears to be driven more significantly by **risk management considerations related to its financial partners and, to a lesser extent, by the moral or ethical judgments these partners impose** under the guise of risk mitigation. The policy reflects a pragmatic business decision by Valve to ensure the continued viability of its payment processing infrastructure, even if it means adopting content restrictions that go beyond strict legal mandates in many jurisdictions.

4.5.1. Primary Driver: Financial and Reputational Risk for Payment Processors

The **dominant driver behind Steam's policy change is the imperative to manage financial and reputational risks for its payment processors**, such as Visa, Mastercard, and PayPal. These financial institutions categorize adult content as "high-risk" due to elevated chargeback rates, potential for fraudulent transactions, and the perceived threat to their brand image if associated with controversial or illegal material . Payment processors wield significant "veto power" because platforms like Steam depend entirely on their services for e-commerce transactions . If these processors decide that certain content on Steam violates their policies or poses too great a risk, they can threaten to withdraw payment processing capabilities, which would be catastrophic for Steam's business. Therefore, Steam's new rule is primarily a **proactive measure to align with the risk tolerance and content standards of these financial partners**, ensuring that its platform does not become a source of financial loss or reputational damage for them. This is a matter of commercial necessity for Valve, prioritizing the stability of its core business operations over a more permissive content policy. The historical precedents of payment processors intervening against platforms like Pornhub further underscore this primary motivation .

4.5.2. Secondary Driver: Compliance with Evolving Global and Local Regulations

A secondary, but still significant, driver for Steam's policy update is the need to navigate an **evolving landscape of global and local regulations concerning online content, particularly adult material**. Laws such as the UK Online Safety Act, the EU's Audiovisual Media Services Directive (AVMSD) and Digital Services Act (DSA), and various age verification mandates in different jurisdictions are increasing the legal and regulatory burdens on online platforms . These regulations often require platforms to implement measures to protect minors, combat illegal content, and ensure greater transparency in content moderation. While Steam's new rule directly references payment processor standards, these financial institutions are themselves subject to a complex web of financial regulations, including AML/CTF laws, which necessitate robust KYC/CDD procedures, especially for high-risk merchants . The stricter rules imposed by payment processors, such as Mastercard's requirements for age verification and content review for adult content merchants, can be seen as a response to these broader regulatory pressures . By aligning with these processor standards, Steam is indirectly ensuring a degree of compliance with the wider regulatory environment, thereby mitigating its own legal risks and simplifying its operational complexities in a globally regulated market. This regulatory backdrop reinforces the cautious approach adopted by both payment processors and platforms.

4.5.3. Tertiary Consideration: Potential for Broader Societal or Political Pressures Influencing Corporate "Morality"

While the primary and secondary drivers are more concrete, a tertiary consideration influencing Steam's policy is the **potential for broader societal or political pressures to shape the "corporate morality" of payment processors and, by extension, platforms like Steam**. This is evident in the phenomenon of "definitional creep," where payment processors expand their definitions of "harmful" or "objectionable" content based on reputational optics and a desire to avoid controversy, sometimes influenced by campaigns from anti-pornography or anti-sex work groups . These external pressures can lead financial institutions to adopt a more conservative stance on adult content, effectively imposing their moral or ethical judgments on what content is commercially viable. While direct evidence of specific religious or conservative groups pressuring Steam on adult games is limited in the provided information, the general climate of "financial censorship" allows for such influences to be amplified . Payment processors, acting as de facto moral gatekeepers, may prioritize a sanitized, corporately palatable version of sexuality, potentially at the expense of diverse or transgressive content, even if it is legal and consensual . This means that Steam's policy, by deferring to these external standards, incorporates an element of corporate "morality" that is driven by risk aversion and public perception, rather than solely by legal mandates or a commitment to free expression. The vagueness of "certain kinds of adult only content" leaves room for these broader societal pressures to influence what is ultimately deemed acceptable on the platform.