



WHISTLEBLOWER POLICY

(Effective August 1, 2026)

Policy Overview

AppLovin Corporation (together with its affiliates and subsidiaries, the **"Company"** or **"AppLovin"**) is committed to maintaining high standards of financial integrity, and the Audit Committee (the **"Audit Committee"**) of the Board of Directors (the **"Board"**) of AppLovin takes very seriously all complaints and concerns regarding accounting, internal accounting controls, auditing and other legal matters. AppLovin's financial information guides the decisions of the Board and management and is relied upon by the Company's stockholders, employees and business partners. AppLovin's policies and practices have been developed to maintain the highest business, legal and ethical standards.

We rely upon our officers, directors, employees, independent contractors who provide services to AppLovin and others who do business with us to bring to light good faith concerns regarding AppLovin's business practices, including reporting: (1) suspected legal violations; (2) concerns regarding the provision of truthful information in connection with an inquiry or investigation by a court, an agency, law enforcement, or any other governmental body; and (3) potential violations of our Code of Business Conduct and Ethics. (Throughout this Policy, we refer to the scenarios set forth in items 1, 2 and 3 together as **"Violations"**.)

The integrity of our business practices and financial information is paramount and we aspire to maintain a workplace where employees, when they reasonably believe that they are aware of questionable accounting, internal accounting controls, or other financial matters, or the reporting of fraudulent financial information (which we refer to in this Policy as **"Fraudulent Activities"**), can raise these concerns free of any retaliation, discrimination or harassment.

AppLovin employees are expected to act and perform their duties ethically, honestly and with integrity and the success of AppLovin depends on this. As an AppLovin employee, if you are aware of a potential Violation or Fraudulent Activity and do not report it according to this Policy, your inaction may be considered a Violation itself, which may result in disciplinary action, up to and including termination of your employment or any other working relationship that you may have with AppLovin.

Who does this Policy apply to?

This Policy applies to all employees, officers, directors and independent contractors who provide services to AppLovin (all of whom we will refer to collectively as **"employees"** or **"you"** throughout this Policy). For purposes of this Policy, **"we"** and **"our"** refers to AppLovin Corporation and its subsidiaries.

Matters to be Reported

You are encouraged to report and submit complaints of accounting and auditing matters for which there is actual or suspected:

- Intentional error or fraud in the preparation, review or audit of any of AppLovin's financial statements;

- Significant deficiencies in our internal and reporting controls or intentional noncompliance with those controls;
- Violations of rules and regulations established by the Securities and Exchange Commission (the “SEC”) that are related to accounting, internal accounting controls and auditing matters; or
- Fraud against investors, securities fraud, mail or wire fraud, bank fraud or fraudulent statements to management, the SEC or members of the investing public.

You are also encouraged to report and submit complaints regarding other Violations or Fraudulent Activities.

Reporting Procedures

If you have a good faith concern regarding conduct that you believe to be a violation of AppLovin’s policies, or you believe that any Violation or Fraudulent Activity has occurred or is occurring, we encourage you to:

- discuss the situation with your manager; or
- if your manager is involved in the situation or you are uncomfortable speaking with your manager, contact the Chief Legal Officer or the Chief Financial Officer; or
- if you don’t believe your concern is being adequately addressed, or you are not comfortable speaking with one of the above-noted contacts, you may report your concern via our confidential Whistleblower Hotline at www.lighthouse-services.com/applovin or by phone in the U.S. 866-222-0713, through which you may choose to identify yourself or remain anonymous. For country specific reporting instructions, please refer to the attached **Exhibit A**. Concerns submitted through the reporting hotline that are financial or accounting related will be reviewed by a member of the Audit Committee and the Chief Legal Officer, as appropriate.

Please also see “Additional Enforcement Information” below.

Treatment of Complaints

Accounting and Auditing Complaints

All accounting and auditing complaints received shall be entered on an accounting and auditing matters log, which shall include, among other things, information regarding the date the complaint was received, a description of the complaint, the submitter (if provided), and the status and disposition of an investigation of the complaint. Receipt of the complaint will be acknowledged to the sender, within a reasonable period following receipt, if appropriate information for response is supplied.

With respect to complaints not initially directed to the Audit Committee regarding accounting or auditing matters, the Chief Legal Officer will report immediately to the Audit Committee matters she deems significant (e.g., allegations of fraud or allegations of accounting or auditing matters involving executive officers). The Audit Committee shall direct and oversee an investigation of such complaints, as well as any complaints initially directed to the Audit Committee, as it determines to be appropriate.

All other complaints regarding accounting or auditing matters that the Chief Legal Officer deems not to be significant shall be reviewed under the direction and oversight of the Chief Legal Officer, who will involve such other parties (e.g., members of the internal audit team or outside advisors) as deemed appropriate. The Chief Legal Officer shall provide the Audit Committee with a quarterly report of all accounting or auditing complaints received and an update of pending investigations. The Audit Committee may request special treatment for any complaint and may assume the direction and oversight of an investigation of any such complaint.

Non-Accounting and Auditing Complaints

Non-accounting or non-auditing complaints shall be logged separately and will be forwarded to the appropriate person or department for investigation (e.g., the Chief Legal Officer or, if involving the Chief Legal Officer or Legal Department, to outside counsel), unless the Audit Committee or Chief Legal Officer, as appropriate, deems other treatment is necessary (e.g., such complaint involves a finance employee or an executive officer). Independent outside counsel shall be consulted regarding any complaint or investigation involving an executive officer.

Investigation and Reporting

Reported violations will be taken seriously and will be investigated. The specific action taken in any particular case depends on the nature and gravity of the conduct or circumstances reported and the results of the investigation. Where a Violation or Fraudulent Activity has been reported and confirmed, we will take corrective action proportionate to the seriousness of the offense. This action may include disciplinary action against the accused party, up to and including termination of employment or any other working relationship that the offending party may have with AppLovin. Reasonable and necessary steps will also be taken to prevent any further Violation or Fraudulent Activity.

The Audit Committee shall provide reports to the Board periodically regarding all significant complaints and the results of any investigation regarding a complaint, including any corrective actions taken.

No Retaliation

We are committed to providing a work environment in which you feel free to raise any good faith concern, free of retaliation, discrimination or harassment (to which we refer collectively throughout this Policy as “**Retaliation**”). Accordingly, AppLovin will not tolerate any Retaliation against any individual who reports in good faith or participates in the investigation of any suspected Violation or Fraudulent Activity in accordance with this Policy.

If you believe that you have been subject to Retaliation for having made a report in compliance with this Policy or for having participated in any investigation relating to an alleged Violation or Fraudulent Activity, please immediately report any alleged Retaliation to the Chief Legal Officer or the Chief Financial Officer. If, for any reason, you do not feel comfortable discussing the alleged Retaliation with these people, please report the alleged Retaliation through the Whistleblower Hotline at www.lighthouse-services.com/applovin or by phone in the U.S. at 866-222-0713. For country specific reporting instructions, please refer to the attached Exhibit A. Bringing any alleged Retaliation to our attention promptly enables us to honor our values, and to promptly and appropriately investigate the reported Retaliation. If a complaint of Retaliation is proven to be true, appropriate disciplinary action will be taken against the accused party, up to and including termination of employment or any other working relationship that the accused may have with AppLovin.

Confidentiality

Information disclosed during the course of the investigation will, to the extent practical and appropriate, remain confidential. Exceptions to confidentiality may be reasonably necessary in circumstances including, but not limited to, disclosure necessary to facilitate the investigation, take any remedial action, and to comply with applicable law. Access to reports and records of complaints may be granted to regulatory agencies and other parties at the discretion of the Audit Committee. Documents that are covered by the attorney-client communication and/or work-product privileges should not be disclosed unless the AppLovin Legal Department, following consultation with the Board or Audit Committee, has consented in writing to a waiver of privilege.

For any Violation or Fraudulent Activity not reported through an anonymous report, we will advise the reporting employee that the Violation or Fraudulent Activity has been addressed and, if we are able, of the specific resolution. However, due to confidentiality obligations, there may be times when we will not be able to provide the details regarding the corrective or disciplinary action that was taken.

Retention of Complaints

The Chief Legal Officer shall retain written complaints, the accounting and auditing matters log and all related documentation as required under applicable law.

Additional Enforcement Information

AppLovin endeavors to operate on a transparent basis, and we want to be made aware of alleged wrongdoings and to address them as soon as possible. We encourage you to first address your concerns by following the procedures outlined herein for reporting to or through AppLovin, so that we may conduct our own internal investigation and take corrective action as quickly as possible. Among other things, we may choose to self-report certain matters to government or other agencies. However, nothing in this Policy is intended to prohibit or restrict you from filing a charge or complaint, or otherwise communicating, cooperating or participating with any state, federal or other governmental agency or self-regulatory agency, including the Securities and Exchange Commission, the Equal Employment Opportunity Commission and the National Labor Relations Board. In making any such disclosures or communications, you must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute AppLovin confidential information to any parties other than the relevant agencies. Notwithstanding any other policies, you are not required to obtain authorization from AppLovin prior to disclosing information to or communicating with such agencies, nor are you obligated to advise AppLovin as to any such disclosures or communications. A report to such agencies may be made instead of, or in addition to, a report directly to AppLovin through its management or the Reporting Hotline.

Amendments

We are committed to continuously reviewing and updating our policies, and therefore reserve the right to amend this Policy at any time, for any reason, subject to applicable law. Management may update the contact information on Exhibit A from time to time as appropriate.

Exhibit A

COUNTRY SPECIFIC WHISTLEBLOWER HOTLINE INFO

Country/Language	Website	Phone Number	Access Code	Country Code
Canada/English	www.lighthousegoto.com/applovin/eng	866-222-0713	N/A	N/A
Canada/French	N/A	855-725-0002	N/A	N/A
Canada/Spanish	www.lighthousegoto.com/applovin/spa	800-216-1288	N/A	N/A
Czech Republic/Czech	www.lighthousegoto.com/applovin/cze	800-603-2869	00-800-222-55288	420
China/Traditional Chinese	www.lighthousegoto.com/applovin/ctr	800-603-2869	North, Beijing CNCG 108-888 South, Shanghai (China Telecom) 10-811	North, Beijing CNCG 86 South, Shanghai (China Telecom) 86
Cyprus /Greek	www.lighthousegoto.com/applovin/gre	800-603-2869	800-900-10	357
Cyprus/Turkish	www.lighthousegoto.com/applovin/tur	800-603-2869	800-900-10	357

Germany	www.lighthousegoto.com/applovin/ger	800-603-2869	0-800-25-5288	49
Israel	www.lighthousegoto.com/applovin/heb	800-603-2869	Barak 1-80-933-3333 Bezeq 1-80-949-4949 Golden Lines 1-80-922-2222	Barak 972 Bezeq 972 Golden Lines 972
Japan	www.lighthousegoto.com/applovin/jpn	800-603-2869	KDDI 00-539-111 NTT 0034-811-001 Softbank Telecom 00-663-5111	KDDI 81 NTT 81 Softbank Telecom 81
Mexico/Spanish	www.lighthousegoto.com/applovin/spa	01-800-681-5340	N/A	N/A
Spain/Spanish	www.lighthousegoto.com/applovin/spa	800-603-2869	900-99-0011	34
US/English	www.lighthousegoto.com/applovin/eng	866-222-0713	N/A	N/A
US/Spanish	www.lighthousegoto.com/applovin/spa	800-216-1288	N/A	N/A

International Calling Instructions for Employees Outside of Canada, Mexico, and the United States:

1. Make sure you have an outside line.
2. Enter the Direct Access Code identified above for the country and/or the telephone system you are calling from. You will then hear a noise that sounds like 'bong'. Access codes are subject to change. If the access code above does not work, please refer to the [AT&T Direct Toll-Free Access Codes](#).
3. An English-language voice prompt will ask for the number you are calling.
4. Enter the telephone number identified above. There is no need to dial "1" first. This will connect you to the hotline.
5. A greeting will be played in multiple languages. Choose from the pre-recorded language prompts or press 000 and tell the English operator the language you speak. An interpreter will then join the call in 2-3 minutes. An operator will interview you, aided by the interpreter.
6. A report in English will then sent be to the designated recipient(s) of your company.