ANTI-BRIBERY/ANTI-CORRUPTION POLICY

(As amended on October 30, 2025)

AppLovin Corporation (together with its subsidiaries, **"AppLovin"**) has zero tolerance for bribery and other forms of corruption. Our policy on bribery and corruption reflects our commitment to conducting business in accordance with all applicable anti-corruption laws and regulations and in accordance with high ethical standards.

Corrupt conduct can have severe legal consequences for AppLovin as well as those who have engaged in, approved or acquiesced in such conduct. The potential consequences include heavy fines, imprisonment, termination of a tainted contractual arrangement, a ban on doing business with governments and government-owned entities, reputational damage and the appointment of a court appointed compliance monitor.

Responsibilities

This Policy applies to all directors, officers, and employees of AppLovin and its subsidiaries ("**Team Members"**), as well as its consultants, agents, contractors, business partners, and any other third-party representatives acting on or purporting to act on AppLovin's behalf ("**Representatives,**" and together with AppLovin's Team Members, "**Covered Persons**").

No policy or procedures manual, however detailed, can cover every corruption issue that can arise. If you have questions about what you should do in a particular situation, please talk with your manager, supervisor or a member of AppLovin's Legal Team.

If questions arise concerning the policy or procedures summarized in this manual, the bedrock rule is simple:

> *Ask first and act later, once you have obtained authoritative guidance.*

Definitions

"**Family Member**" means a person's spouse, parents, children, siblings, mothers and fathers-in-law, sons and daughters-in-law, brothers and sisters-in-law, and anyone (other than domestic employees) who shares that person's home.

"**Government Official**" means any:

- Person who works for a Government Agency;
- Person acting in an official capacity for a Government Agency;
- Candidate for foreign government or political office;
- Member of a royal family; or
- Person representing one of those people.

"**Government Agency**" means any:

- Government or other regulatory entity, including boards, commissions, and legislative bodies;
- Government-owned or government-controlled entity (including state-owned or state-controlled businesses, universities, or quasi-government entities);
- Political party;
- Royal family;
- Tribunal or arbitral body; or
- Public international organization (*e.g.*, the United Nations or World Bank).

"**Private Sector Individual**" means an individual employed by another company in the private sector with which AppLovin is doing or seeking to do business.

Core Bribery Prohibition

No Covered Person may pay a bribe. A bribe is when one person gives another person something to improperly influence the recipient's conduct. This means that you cannot promise, offer, give, or authorize bribes to any person, whether they are a Government Official or Private Sector Individual. Bribery is not limited to winning contracts—it can take many forms, including customs benefits and tax advantages. There are no exceptions to this Policy, even if you believe that our competitors or other entities engage in improper behavior or if corruption is an accepted practice in a country where we operate. To be clear: (1) offering a bribe is against the law even if the individual does not accept it; (2) a bribe can have value to the recipient even if it does not have value to AppLovin; and (3) it does not matter if you are trying to influence someone (e.g., a government official) by giving something to another person (e.g., that government official's friend or family member). We also cannot have someone else pay a bribe for us.

Bribes can take many forms, including money, real estate, cars, gift cards, tuition payments, or offers of employment. Some things, like gifts, meals, or tickets to sporting events can be bribes or they can be legal, depending on your intent.

Giving a thing of value to the Family Member of a Government Official or Private Sector Individual can also be construed as being intended to influence the Government Official or Private Sector Individual.

Gifts, Meals, Entertainment, and Travel

Gifts, meals, and entertainment of nominal value are usually not bribes and are generally permitted, but cash or cash equivalents (like gift cards) and expensive or lavish items that may be viewed as an attempt to improperly influence someone are not permitted.

You may not provide anyone—whether a Government Official or Private Sector Individual—with something if you know that it violates their employers' policies or their country's laws covering what they can accept. You also must ensure that you give things openly in AppLovin's name—hiding that you are giving something to someone can indicate bad intent. Gifts, meals, and entertainment must be given in good faith and without expecting any improper advantage in return. Please refer to AppLovin's Code of Conduct and Business Ethics and AppLovin's Global Travel and Expense Policy for additional information about our policies covering gifts, meals, entertainment, and travel.

Charitable Donations

The making of charitable donations by AppLovin generally is permitted but must be approached with caution. Care must be taken to minimize the risk of the donation's creating an appearance of impropriety. All charitable donations to be made on behalf of or in the name of AppLovin require prior written approval from the Legal Team before any offer or payment is made.

Political Contributions

AppLovin may communicate its position on important issues to Government Officials and will comply with all applicable laws covering political contributions. Donations to political campaigns or causes can violate anti-corruption laws, especially if contributions are made at the request or suggestion of a Government Official. Any contribution made on behalf of AppLovin or using AppLovin funds or facilities must be pre-approved, in writing, by the Chief Administrative and Legal Officer.

The foregoing prohibition is not meant to discourage participation by Covered Persons in the political process so long as such participation is purely private, does not use AppLovin's resources and complies with local laws and regulations.

Facilitation Payments

AppLovin prohibits the making of so-called "facilitation" payments. Facilitation payments are bribes, usually of small amounts, made to a Government Official to expedite non-discretionary government action to which AppLovin is legally entitled. Since facilitation payments are bribes, requests for them must be rejected and reported to the Legal Team promptly. Facilitation payments are different from expediting fees that are openly and publicly charged by a Government Agency (not made to an individual) at a set amount to speed up non-discretionary activity by the agency and are permitted by law.

Misconduct by Third Party-Representatives

We may not authorize or permit our Representatives to do anything on AppLovin's behalf that we could not or would not do ourselves. To protect AppLovin from liability for Representative misconduct, the procedures summarized below should be followed before a Representative is retained. The AppLovin Legal Team is responsible for and has the authority to determine the nature and extent of appropriate, risk-based due diligence, contractual provisions, compliance safeguards, and other legal terms and conditions for our Representatives.

Representative Due Diligence

Appropriate, risk-based due diligence must be completed on all proposed Representatives unless a member of AppLovin's Legal Team concludes that the proposed Representative does not present a legal risk to AppLovin or our Team Members. The members of AppLovin's Legal Team have been assigned responsibility for determining the nature and extent of the pre-retention due diligence that is completed on proposed Representatives.

Bribery Related "Warning Flags"

In reviewing the results of the due diligence that has been completed on proposed Representatives, special attention should be paid to any bribery related "warning flags," including the following:

- Unusual payment requests such as requests for (a) an above market rate of compensation, (b) a substantial up-front payment, (c) payment in a country other than the country or countries in which the goods or services that AppLovin needs are expected to be provided or the individual or entity is headquartered or maintains some other physical presence, (d) the payment of a success fee of a type or size that would tend to incentivize bribery or (e) payment in cash for all or a portion of the goods or services that AppLovin needs.
- Comments suggesting that the value added by the proposed Representative consists in whole or in part of an already existing relationship between the proposed Representative and one or more Government Officials.
- A Government Official introduced the proposed Representative to us and/or recommended that that AppLovin retain the proposed Representative.

Responding to Bribery Related "Warning Flags"

If a bribery related "warning flag" has been identified during the due diligence process, a member of AppLovin's Legal Team must be consulted ***before*** the proposed Representative is retained.

Contractual Requirements for Representatives

No Representative, or any other entity or individual, should provide services to AppLovin or be permitted to interact on AppLovin's behalf with external persons or entities – including in particular Government Officials – without first having executed a written agreement containing appropriate anti-bribery/anti-corruption provisions that have been approved by the Legal Team.

Monitoring the Conduct of AppLovin's Representatives

The conduct of AppLovin's Representatives must be monitored on a risk-based basis to ensure their continuing compliance with the laws and regulations prohibiting public and private sector bribery. To facilitate appropriate oversight of the conduct of our Representatives, the AppLovin employee responsible for managing the engagement of the Representative shall monitor the work being done by each Representative and consult with the Legal Team to determine whether, based on the risk profile of the Representative, such Representative should be required to periodically complete and provide an Anti-Bribery/Anti-Corruption Certificate of Compliance.

Corporate Transactional Activity

The corruption risks posed by merger, acquisition, joint venture, and other corporate transactional activity will vary depending on several factors, including the nature of the transaction and the contemplated relationship. Our Legal Team must be involved at the earliest stage possible of any contemplated activities to help devise an appropriate approach to anti-corruption due diligence and post-transaction integration. Once completed, if we control or operate a business, we will implement this policy promptly. If we do not control or operate the business, we will use our influence to encourage it to follow this Policy or to adopt appropriate policies to ensure compliance with anti-corruption laws.

Books and Records

Applicable anti-corruption laws and regulations require AppLovin to maintain adequate records which, in reasonable detail, accurately and fairly reflect the transactions and dispositions of AppLovin's assets.

Whether or not assigned a formal oversight responsibility with respect to our books and records, every Team Member has an important role to play in ensuring that our books and records are kept and maintained in an appropriate manner. Additionally, under certain circumstances, AppLovin could be liable under anti-corruption laws if an employee knows of misconduct by a Representative without explicit proof of bribery. For example, if a Team Member knows that a Representative has overbilled clients to create slush funds, AppLovin could be liable. Everyone must notify the Legal Team if they become aware of any sort of slush funds or off-the-books accounts.

Discipline

In addition to the civil and criminal penalties that can be imposed upon individuals for having violated applicable anti-bribery/anti-corruption laws and regulations, AppLovin reserves the right to sever our relationship with any director and to terminate the employment or other relationship of any Covered Person who violates such laws and regulations or the anti-bribery/anti-corruption policy and procedures summarized in this manual. Relationships with business partners may also be terminated for violations of this policy or applicable anti-bribery/anti-corruption laws and regulations.

Cooperating with Internal Investigations

You and all other Covered Persons will be expected to cooperate fully in any internal investigation that AppLovin decides to undertake or direct of possible violations of the anti-bribery/anticorruption policy and procedures summarized in this manual and/or the laws or regulations prohibiting bribery and other forms of corruption.

AppLovin reserves the right to discipline anyone who does not cooperate with an internal investigation of possible misconduct.

Reporting Obligation

Any Covered Person who learns of possible bribery or corruption involving AppLovin must report his or her concerns immediately, preferably in writing to his or her immediate supervisor, the AppLovin Legal Team (legal@applovin.com) or through our ethics hotline as set forth in AppLovin's Whistleblower Policy. AppLovin reserves the right to take appropriate disciplinary action, up to and including termination of employment, for failure to make a timely report of possible bribery or other form of corruption prohibited by applicable laws or regulations or this manual.

No Retaliation

AppLovin does not permit retaliation or retribution for reports made in good faith of possible bribery or other form of corruption by others, including conduct that violates the anti-bribery policy or procedures summarized in this manual.

"Good faith" does not mean that the report must lead ultimately to a finding of misconduct. Rather, it means that the person making the report did so on the belief that misconduct may have occurred.

Periodic Reviews

The Legal Team will oversee periodic reviews to assess AppLovin's anti-corruption risk and the adequacy and effective implementation of this Policy. If any material irregularities are noted during these reviews, the Legal Team shall promptly take any necessary actions.

Amendments to this Policy

AppLovin is committed to continuously reviewing and updating its policies, and AppLovin therefore reserves the right to amend this Policy at any time, for any reason, subject to applicable law.