Chegg Responsible Marketing (the "Policy")

Last Updated: June 2021

#### Introduction

As outlined in our <u>Code of Business Conduct and Ethics</u>, "we must communicate accurately and consistently with the public – it's important to our brand and may be necessary to meet our legal obligations."

We are committed to understanding, respecting, and supporting the needs of our students and striving to earn their trust through everything we do. As part of our mission to help students save time, save money, and get smarter, we work to make our marketing and advertising honest, accurate, and consistent with our values.

In order to articulate our commitment to responsible marketing and advertising across voice, print, and digital channels, we have formulated this Policy for use by those involved in marketing and advertising across Chegg. When our marketing and advertising activities include work with external partners, we seek to choose partners whose own policies, practices, and values align with our own. This Policy defines our guidelines and principles for responsible marketing and advertising and is consistent with our values and our mission of helping students. This Policy has been approved by Chegg's Chief Marketing Officer.

### Scope

The scope of this Policy covers marketing and advertising for all Chegg companies.

## Ethical, Truthful, and Responsible Communication

**Ethical.** We do not directly market to children under the age of 16. We aim to avoid advertising on media in which at least 35% of the target audience are children aged 0-16, or on media or digital channels that are directed to children, or at children's television viewing times. While we do not always enjoy full control of paid advertising reach, we aim to prevent our marketing content from unintentionally reaching children under the age of 16.

**Honest.** We communicate about our products honestly and accurately. We take care not to make misleading or unfounded claims about our products or in comparison with other products.

**Transparent.** We use clear language in our marketing communications intended to convey material information to our consumers. Product pictures are materially accurate representations of the products. We take care to make the boundary between content and commercial promotion clear and identify commercial content as such. We require our sponsorship to be clearly disclosed.

**Inclusive.** Our messages encourage human diversity in various forms and we strive to reflect the reality of our students in our marketing and communications.

# **Consumer Data Privacy**

We conform to Chegg's data privacy rules and policies covering all aspects of the collection and use of Chegg user and customer information. We work to act transparently, protect and secure the data, respect the rights of our consumers, and verify compliance with all legal requirements. For further information, please review the Chegg Global Privacy Policy.

## **Training, Compliance and Review**

All new members of our marketing and advertising teams are required to review and acknowledge this Policy as part of their onboarding to the company.

We consistently work to comply with all applicable laws and regulations in the markets in which we operate. We maintain training programs for management and employees who are involved in and oversee marketing, and allocate appropriate resources to address any required actions. All individuals are encouraged to report any instances of marketing or advertising that violate the elements stated in this Policy. All reports may be directed to our communications department. Our Chief Marketing Officer is responsible for compliance with responsible marketing content creation and distribution, reporting directly to our Chief Executive Officer. Oversight of marketing legal compliance is provided by our legal team, who work closely with our marketing team .

We will review this Policy from time to time so that it remains relevant, effective and appropriate and we will update as necessary, as determined by our then-current Chief Marketing Officer.

## Communication

This Policy is available to our employees through our internal internet portal and externally on our corporate website.