



Code of Conduct and Business Ethics

(Adopted on December 1, 2020)

AppLovin Corporation (together with its affiliates and subsidiaries, the “**Company**” or “**AppLovin**”) is a values-driven organization. Our values are more than just words to make us feel good, they are guiding principles for how we operate. They are our expectations for each other and ourselves. Our values drive our decisions and define our culture.

A. Purpose

This Code of Conduct and Business Ethics (this “**Code**”) was adopted to further AppLovin’s commitment to conducting its business with honesty and integrity. This Code applies to all directors, officers and employees of the Company (who, unless otherwise specified, are collectively “**employees**”), as well as contractors and consultants of the Company. For purposes hereof, “contractors” and “consultants” shall mean contractors and consultants who provide services to AppLovin.

This Code is intended to ensure and promote:

1. fair and accurate financial reporting;
2. ethical conduct and compliance with applicable laws, rules and regulations including, without limitation, full, fair, accurate, timely and understandable disclosure in reports and documents we file with or submit to the Securities and Exchange Commission and in our other public communications;
3. the prompt internal reporting of violations of this Code, as set forth in this Code;
4. honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest;
5. a culture of honesty and accountability; and
6. the deterrence of wrongdoing.

This Code serves as a source of guiding principles, and the Company expects employees, contractors and consultants to use their own judgment at all times to follow the high ethical standards to which the Company is committed.

You are expected to read the policies set forth in this Code and ensure that they understand and comply with them. The AppLovin Legal Team (legal@AppLovin.com) is responsible for applying these policies to specific situations in which questions may arise and has the authority to interpret these policies in any particular situation. Any questions about this Code or the appropriate course of conduct in a particular situation should be directed to AppLovin’s Legal Team, who may consult with the Company’s outside legal counsel or the Company’s Board of Directors (the “**Board**”), as appropriate.

This Code should be read in conjunction with other policies applicable to an employee, contractor or consultant. Any determination with respect to the applicability of the provisions of this Code with respect to officers or directors of the Company may be made only by the Board.

B. Financial Reports and Other Records – Disclosure

Employees, contractors and consultants are responsible for the accurate and complete reporting of financial information within their respective areas of responsibility and for the timely notification to senior management of financial and non-financial information that may be material to the Company. The Company expects all of its employees, contractors and consultants to take this responsibility very seriously to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that the Company files with government agencies or releases to the general public.

Each employee, contractor and consultant, to the extent involved in the Company's disclosure process, including without limitation, the principal executive officer, principal financial officer and other senior employees who perform similar functions in the Company (collectively, "**Senior Financial Officers**"), must familiarize themselves with the disclosure requirements applicable to the Company as well as the business and financial operations of the Company, and must not knowingly misrepresent, or cause others to misrepresent, facts about the Company to others, whether within or outside the Company, including to the Company's independent auditors, governmental regulators and self-regulatory organizations.

All of the Company's books, records, accounts and financial statements must be maintained in reasonable detail, and reflect the matters to which they relate accurately, fairly and completely. Furthermore, all books, records, accounts and financial statements must conform both to applicable legal requirements and to the Company's system of internal controls. All assets of the Company must be carefully and properly accounted for. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation and authorization. Misclassification of transactions as to accounts, business units or accounting periods is forbidden. Each employee, contractor and consultant bears responsibility for ensuring that they are not party to a false or misleading accounting entry.

C. Conflicts of Interest

A conflict of interest is any activity or interest that is inconsistent with or opposed to the best interests of the Company. Your decision and actions in the course of employment or other relationship with the Company should be based on the best interests of the Company and not based on personal relationships or benefits. You must never use or attempt to use your position with the Company to obtain improper personal benefits. Any situation, transaction or relationship that may give rise to an actual or potential conflict of interest must be disclosed to the Company and shall be avoided, unless approved by the Company.

The following are some examples of conflicts of interest to be avoided:

1. Family Members. You may not conduct business on behalf of the Company with family members or an organization with which a family member is associated, unless such business relationship has been disclosed to and authorized by the Company and is a bona fide arms-length transaction. "Family members" include a spouse, parents, children, siblings and in-laws.
2. Interests in Other Businesses. You may not accept compensation in any form for services performed for the Company from any source other than the Company. You should not have

an undisclosed material financial interest in a competitor, supplier, customer or business partner of the Company.

3. Improper Conduct and Activities. You may not engage in any conduct or activities that are inconsistent with the Company's best interests or that materially disrupt or impair the Company's relationship with any person or entity with which the Company has or proposes to enter into a business or contractual relationship.
4. Gifts and Gratuities. This policy does not prohibit normal, appropriate and modest hospitality to or from third parties. These customary courtesies are designed to build goodwill among business partners. You should, however, be mindful that public officials may be restricted in the benefits they can accept for performing their duties, including non-cash benefits such as travel, meals and entertainment. The practice of giving business gifts and taking part in corporate hospitality or undertaking speaking engagements varies between countries, regions and industries. What may be normal and acceptable in one may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable (both from the perspective of the provider and recipient) rather than lavish and extraordinary; bearing in mind that what may normally be viewed as small or insignificant in some countries can be of significant value in another. The intention behind the gift should always be considered and nothing should be explicitly or implicitly expected or demanded in return. The giving of gifts and corporate hospitality or entertainment is not prohibited, if the following requirements are met:
 - a. it is done in the normal course of the Company's business and without the intention of, or without a reasonable prospect of, influencing a third party to obtain or retain an improper business advantage, or to reward the provision or retention of an improper business advantage, or in explicit or implicit exchange for favors or benefits;
 - b. it complies with U.S. and applicable local law;
 - c. it does not include cash or a cash equivalent;
 - d. it must be properly recorded and disclosed, and not paid personally to avoid any approval or disclosure requirements;
 - e. taking into account the reason for the gift or hospitality, it is of an appropriate type and value in the applicable country/region and given at an appropriate time;
 - f. it is given openly and in the Company's name, not secretly;
 - g. it is not given or received frequently between the same individuals; and
 - h. gifts or hospitality should not be offered to public officials or government representatives, or politicians or political parties, without the prior approval of AppLovin's Chief Legal Officer.
5. Personal Use of Company Assets. You may not use Company assets, labor or information for personal use, other than incidental personal use, unless approved by the Company.

Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. Please reference the Company's Anti-Bribery / Anti-Corruption Policy and Procedures Manual. We also encourage you to seek guidance from your manager, AppLovin People Ops or the AppLovin Legal Team when you have any questions or doubts.

If you are aware of an actual or potential conflict of interest where your interests may conflict with the Company's interests, or are concerned that a conflict might develop, please discuss with your manager and then obtain approval from AppLovin's Chief Legal Officer or their designee before engaging in that activity or accepting something of value.

D. Corporate Opportunities

Except as otherwise set forth in the Company's certificate of incorporation and bylaws, employees owe a duty to the Company to advance the Company's business interests when the opportunity to do so arises. You are prohibited from taking or directing to a third party to take, a business opportunity that is discovered through the use of corporate property, information or position, unless the Company has already been offered the opportunity and turned it down. More generally, you are prohibited from using Company property, information or position for personal gain. You are further prohibited from competing with the Company directly or indirectly.

Sometimes the line between personal and Company benefits is difficult to draw, and sometimes there are both personal and Company benefits in certain activities. The prudent course of conduct is to make sure that any use of Company property or services that is not solely for the benefit of the Company, is approved beforehand by the Company.

E. Protection of Assets, Confidentiality & Communications

You should endeavor to protect the Company's assets and ensure their efficient use. Any suspected incident of fraud or theft should be reported immediately to your immediate supervisor or manager or other appropriate Company personnel for investigation.

In carrying out the Company's business, you may learn confidential or proprietary information about the Company, its customers, suppliers or business partners. Confidential or proprietary information of the Company, and of other companies, includes any non-public information that would be harmful to the relevant company or useful to competitors if disclosed.

You must maintain the confidentiality of information about the Company and other companies entrusted to you by the Company, use the information only for permissible business purposes and in accordance with any restrictions imposed by the disclosing party, and limit dissemination of the confidential information, both inside and outside the Company, to people who need to know the information for business purposes and who are bound by similar obligations of confidentiality, unless disclosure is authorized or legally mandated.

The obligation to protect confidential information does not end when you terminate your relationship with the Company. Any questions about whether information is confidential should be directed to AppLovin's Legal Team.

If you are contacted by a member of the financial community, the press or any other outside organization or individual seeking information about the Company other than in the ordinary course of business, you should consult with AppLovin's Chief Marketing Officer prior to responding. This includes, among other

things, answers to questions in overall business trends, business in different geographies, pricing, suppliers, new offerings or technologies and lawsuits or disputes.

F. Fair Dealing

The Company has a history of succeeding through honest business competition. The Company does not seek competitive advantages through illegal or unethical business practices. You should endeavor to deal fairly with each other and with the Company's customers, service providers, suppliers, business partners and competitors. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practice.

G. Compliance with Laws, Rules & Regulations

You must respect and obey all laws when carrying out responsibilities on behalf of the company and refrain from illegal conduct.

You have an obligation to be knowledgeable about specific laws, rules and regulations that apply to your area of responsibility. If a law conflicts with a policy in this Code, you must comply with the law.

Any questions as to the applicability of any law should be directed to AppLovin's Legal Team. The following is a brief summary of certain topics about which you should be aware:

1. Antitrust

Competition laws and regulations throughout the world are designed to foster a competitive marketplace and prohibit activities that restrain trade. Generally, actions taken in combination with other companies that restrain competition may violate antitrust laws. Certain antitrust violations involving agreements with competitors are criminal and can result in large fines and prison terms for the individuals involved. In addition, actions taken by an individual company in market segments in which it has a particularly strong position may violate antitrust laws if the actions have the effect of excluding competition through unfair means.

The Company is dedicated to compliance with laws governing fair competition in all of its activities. Any activity that undermines this commitment is unacceptable. The laws governing this area are complex, and you should seek counsel before taking any action whenever appropriate.

2. Health, Safety & Environment

The Company works to conduct its business activities and operations in a manner that promotes protection of people and the environment to the extent practicable. Compliance with all applicable laws, rules and regulations governing health, safety and the environment are a responsibility of management and employees, contractors and consultants in all functions.

3. Fair Employment Practices

The Company works to maintain a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and where discriminatory practices, including harassment, are prohibited.

The Company requires each employee, contractor and consultant to treat all colleagues in a respectful manner and to forge working relationships that are uniformly free of bias, prejudice and harassment. The

Company prohibits discrimination against or harassment of any employee on the basis of race, religion, color, sex, pregnancy, national origin, age, physical or mental disability, military or covered-veteran status, marital status, sexual orientation, family medical leave, gender identity or any other classification protected by applicable federal, state or local law.

Any employee, contractor or consultant who is found to have discriminated against another employee, contractor or consultant is subject to discipline up to and including termination.

You will not suffer any reprisals or retaliation for making complaints or reporting any incidents of discrimination or perceived discrimination, or for participating in any investigation of incidents of discrimination or perceived discrimination.

4. Political Activities

The Company does not make contributions to political candidates or political parties except as permitted by applicable laws.

Employees, contractors and consultants engaging in political activity will do so as private citizens and not as representatives of the Company. Your personal lawful political contribution, or decision not to make contributions, will not influence your compensation, job security or opportunities for advancement.

5. Foreign Corrupt Practices and Anti-Bribery Laws

You may only transact business on behalf of the Company in foreign markets and with foreign government officials in accordance with the Company's established policies regarding foreign corrupt practices and/or any applicable law, including the United States Foreign Corrupt Practices Act (the "FCPA"), the United Kingdom Bribery Act of 2010, the United States Travel Act and Title 18 of the United States Code section 201. You must never engage in any bribery, kickbacks or other types of corruption when dealing with customers, suppliers or other third parties regardless of local practices or competitive intensity. Specifically, you must never directly or indirectly via a third party make or provide a payment (including cash or any other items of value such as meals, gifts, travel, entertainment, etc.) to a foreign official or government employee to corruptly influence the foreign official or government employee, obtain or retain business for the Company or to acquire any improper advantage.

If you are unaware of the legal rules involving these activities, you should consult with AppLovin's Legal Team before taking any such action. For more information about the FCPA and the rules governing providing things of value to foreign officials, please reference the Company's Anti-Bribery / Anti-Corruption Policy and Procedures Manual, which can be found on the Company's internal website, or contact AppLovin's Legal Team.

H. Compliance & Reporting

1. Seeking Guidance

You are encouraged to seek guidance from supervisors, managers or other appropriate Company personnel when in doubt about the best course of action to take in a particular situation. In most instances, questions regarding this Code should be brought to the attention of AppLovin's Legal Team.

2. Reporting Violations

If you know of or suspect a violation of this Code, or of applicable laws and regulations (including complaints or concerns about accounting, internal accounting controls or auditing matters), you must report it immediately to AppLovin's Legal Team.

All reports will be kept confidential, to the extent practical, except where disclosure is required to investigate a report or mandated by law. The Company does not permit retaliation of any kind for good faith reports of violations or possible violations.

3. Investigations

Reported violations will be promptly and thoroughly investigated. It is imperative that the person reporting the violation not conduct an investigation on their own. You are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. You should never withhold, tamper with or fail to communicate relevant information in connection with an appropriately authorized investigation.

In addition, you are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided below or by applicable law. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Company representatives, regulators or other governmental entities may be grounds for immediate termination of employment or other relationship with the Company and also be a criminal act that can result in severe penalties.

4. Sanctions

Violations of this Code may result in disciplinary action, up to and including termination. Moreover, employees or officers who direct or approve of any conduct in violation of this Code, or who have knowledge of such conduct but do not immediately report it may also be subject to disciplinary action, up to and including termination of employment. A director who violates this Code or directs or approves conduct in violation of this Code shall be subject to action as determined by the Board.

Furthermore, violations of some provisions of this Code are illegal and may subject you to civil and criminal liability.

5. Disclosure

Nothing contained in this Code or any other Company agreement or policy is intended to prohibit or restrict you from disclosing confidential information to any government, regulatory or self-regulatory agency including under Section 21F of the Securities and Exchange Act of 1934, as amended, and the rules thereunder.

I. Waivers of this Code

Any amendment or waiver of any provision of this Code must be approved in writing by AppLovin's Chief Legal Officer or Chief Financial Officer, and promptly disclosed pursuant to applicable laws and regulations. Any waiver or modification of this Code for a Senior Financial Officer will be promptly disclosed to stockholders if and as required by applicable law.

J. Amendment

The Company is continuously reviewing and updating its policies, and therefore reserves the right to amend this Code at any time for any reason.

K. Acknowledgment

All employees must sign an acknowledgment form confirming that they have read this Code and that they understand and agree to comply with its provisions. Signed acknowledgment forms will be kept in employee personnel files. Failure to read this Code or to sign an acknowledgment form does not excuse any person from the terms of this Code.

**Acknowledgement of
Code of Conduct and Business Ethics**

- I acknowledge that I have received and read the Company’s Code of Conduct and Business Ethics.
- I acknowledge that I understand the standards, policies and procedures contained in the Code of Conduct and Business Ethics and understand that there may be additional standards, policies, procedures and laws relevant to my position.
- I agree to comply with the Code of Conduct and Business Ethics, including the policies referenced therein.
- I acknowledge that if I have questions concerning the meaning or application of the Code of Conduct and Business Ethics, any Company policies or the legal or regulatory requirements applicable to my position, it is my responsibility to seek guidance from my manager, AppLovin People Ops or the AppLovin Legal Team.
- I acknowledge that neither this Acknowledgment nor the Code of Conduct and Business Ethics is meant to vary or supersede the regular terms and conditions of my employment by the Company or to constitute an employment contract.

Please review, sign and return this form to AppLovin People Ops.

(print name)

(signature)

(date)