



Duolingo Responsible Marketing Policy

This Responsible Marketing Policy outlines the principles and guidelines that govern how Duolingo markets its learning application. This policy reflects Duolingo's marketing efforts and aligns with the fundamental principles, policies and procedures outlined in the [Code of Ethics and Conduct](#). This policy applies to all employees, contractors, and partners involved in Duolingo's learning application marketing activities.

Ethical Marketing Practices

Duolingo is committed to conducting marketing activities with honesty, integrity, and transparency. Duolingo will maintain culturally sensitive marketing practices and public communications that reflect the brand's inclusivity as it engages with diverse audiences. As a learning application, a portion of Duolingo's audience is children; Duolingo has additional safeguards in place for this audience relating to paid acquisition or targeted marketing.

All marketing materials and communications must accurately represent the learning app services offered by Duolingo. Misleading or deceptive practices are strictly prohibited.

Legal Compliance

Marketing efforts respect the dignity, privacy, and rights of individuals. Any use of personal data for marketing purposes must comply with applicable data protection laws and regulations. Duolingo makes best efforts to ensure that its marketing efforts materially comply with relevant laws, regulations, and industry standards in each of Duolingo's jurisdictions. Duolingo's advertising materially complies with all applicable advertising platform rules, including regulations related to false advertising, unfair competition, and endorsements.

Internal Compliance

Duolingo has implemented guidelines and content policies that govern marketing content. At the time of employee onboarding, a clear understanding and adherence to Duolingo's internal marketing guidelines are emphasized. In addition, this policy is available to all employees on our intranet.

Duolingo employs a third-party consultant to advise on select topics' compliance with internal guidelines, procedures, and content policies. In addition, Duolingo attempts to ensure adherence to relevant laws and internal policies by reviewing maintained records of marketing activities on topics such as underage users and tracking, following industry standards, legal requirements, and internal guidelines. Duolingo's learning app marketing guidelines are revised and updated as needed.

Oversight

This policy has been approved by Duolingo's Chief Marketing officer and will be updated as necessary. The Board is briefed periodically and at least annually on the Company's marketing performance and strategy.