May 31, 2023

Political Contributions and Lobbying Policy

Political Contributions

US law prohibits Udemy from making corporate contributions to candidates, political party organizations, political committees, or Political Action Committees at the federal level.
At Udemy, we do not allow any political contribution, in any form, to be provided in return for an implied or promised official act, and we're committed to compliance with all applicable laws and disclosure requirements. In the rare case that we believe a corporate contribution would reflect Udemy's corporate interests, Udemy's Legal team must first approve the contribution. We do not allow any contributions that reflect the interests of any individual or officer at Udemy.

We apply these same general principles to non-US political contributions as well. Specifically, for example, we do not allow any political contribution to be provided to a candidate or political organization in return for an implied or promised official act. Any political contributions we choose to make must also comply with local law and other applicable rules (e.g., the Foreign Corrupt Practices Act). Where local law allows one of Udemy's non-US entities to make a contribution, Udemy's Legal team must first approve it.

Political Activities

Udemy does not make direct political contributions to individual candidates, parties, committees, or IRS Section 527 entities. Udemy does not directly pay for any independent expenditure or electioneering communication as defined by law. In the event that Udemy decides to make a direct political contribution as an exception to this policy, Udemy requires management approval.

Lobbying

Udemy discloses US federal, state and local lobbying activity and expenditures as required by law. We don't currently make direct expenditures towards any lobbying activities, including US federal or state grassroots lobbying communications to the general public.

Employee Political Activity

Employees have the right to participate in the political process by making personal contributions from personal funds, subject to applicable legal limits and requirements. However, as stated in our policies, employees won't be reimbursed by Udemy directly or otherwise through compensation increases for any personal contributions or expenses. We do not allow employees to be reimbursed for personal political contributions or expenses under any circumstances, nor to use Udemy resources to promote their personal political views, causes, or candidates.

If an employee chooses to engage in political activity, they do so as a private citizen and not as a representative of Udemy. An employee's personal lawful political contribution, or decision not to make a contribution, will not influence their compensation, job security or opportunities for advancement.

Review

This Political Contributions and Lobbying Policy is periodically reviewed and updated by Udemy's Legal team, and approved by Udemy's General Counsel.