



# **CULTURAL INTELLIGENCE A.I. AUDIT CHECKLIST**

FOR MARKETERS

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# STEP 1: DATA

## Identifying Under-Representation and Cultural Bias in Training Data

### Critical Questions:

#### DATA REPRESENTATION

##### 1.1 Language Diversity

- Does your training data include multiple languages beyond English?
- Are language variants represented? (Mandarin vs Cantonese, Mexican Spanish vs Castilian Spanish)
- Is multilingual data proportional to your target market demographics?
- Are code-switching patterns captured? (bilingual speakers mixing languages)

**Priority:** ● CRITICAL

**Why it matters:** Language-limited data creates blind spots in reaching multilingual audiences

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##### 1.2 Cultural Context in Data

- Does training data include cultural context metadata? (not just demographics)
- Are cultural moments and celebrations represented? (Lunar New Year, Diwali, Eid, etc.)
- Is cultural significance tagged? (red = luck in Chinese culture vs danger in Western)
- Are regional cultural differences captured? (Chinese-Canadian vs Mainland Chinese)

**Priority:** ● CRITICAL

**Why it matters:** Data without cultural context leads to offensive or irrelevant outputs

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##### 1.3 Geographic and Demographic Representation

- Does your data represent populations proportional to your market?
- Are under-represented communities included in sufficient volume?
- Is data sourced from diverse geographic regions, not just Western countries?
- Are immigrant and diaspora communities represented distinctly from origin countries?

**Priority:** ● HIGH

**Why it matters:** Geographic bias leads to products that only work for dominant markets

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#### 1.4 Historical Bias Identification

- Have you audited training data for historical bias patterns?
- Are outdated cultural stereotypes flagged and removed?
- Is historical under-representation quantified? (% of data by demographic)
- Are you actively correcting for historical data imbalances?

**Priority:** ● CRITICAL

**Why it matters:** Historical bias in data perpetuates discrimination at scale

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#### 1.5 Cultural Sensitivity in Data Labels

- Are data labels culturally accurate, not stereotypical?
- Were culturally diverse annotators involved in labeling?
- Are cultural nuances captured in labels? (not flattened to broad categories)
- Is offensive or culturally insensitive content flagged and contextualized?

**Priority:** ● CRITICAL

**Why it matters:** Biased labels teach AI to make biased decisions

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#### 1.6 Data Source Diversity

- Are data sources diverse? (not just English-language websites)
- Do sources include multicultural media, platforms, and communities?
- Are culturally specific sources included? (WeChat, ethnic media outlets, community forums)
- Is Western-centric data balanced with non-Western sources?

**Priority:** ● HIGH

**Why it matters:** Homogeneous sources create echo chambers in AI learning

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#### 1.7 Generational and Acculturation Representation

- Does data distinguish between generations? (1st gen immigrant vs 2nd gen)
- Are acculturation patterns captured? (bicultural identity, language preference shifts)
- Is generational cultural change represented? (evolving norms within communities)
- Are hybrid identities represented, not just binary categories?

**Priority:** ● MEDIUM

**Why it matters:** Generational differences significantly impact behavior and preference

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## DATA STAGE - RED FLAGS TO INVESTIGATE:

- ⚠️ **Training data is >80% English-language sources**
  - ⚠️ **No cultural context metadata in data sets**
  - ⚠️ **Data labeling done entirely by non-diverse team**
  - ⚠️ **No audit of historical bias in training data**
  - ⚠️ **Cultural categories are broad and flattened ("Asian," "Hispanic" with no nuance)**
  - ⚠️ **Data sourced entirely from Western platforms and media**
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## DATA STAGE - REMEDIATION ACTIONS:

- ✅ **Conduct data diversity audit** - Quantify representation gaps
  - ✅ **Add multicultural data sources** - Include ethnic media, multilingual platforms
  - ✅ **Enrich with cultural context** - Add metadata about cultural significance
  - ✅ **Engage diverse annotators** - Ensure cultural accuracy in labeling
  - ✅ **Balance historical bias** - Oversample under-represented groups where appropriate
  - ✅ **Document data provenance** - Track where data came from and what it represents
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# STEP 2: MODEL

## Preventing Proxy-Based Discrimination and Identity Simplification

### Critical Questions:

#### MODEL DESIGN AND FEATURES

##### 2.1 Proxy Variable Detection

- Have you identified features that act as cultural proxies? (name, language, location)
- Are proxy variables being used to discriminate indirectly?
- Is the model penalizing culturally specific patterns? (non-Western name formats, international credentials)
- Have you tested for proxy-based discrimination across cultural segments?

**Priority:** ● CRITICAL

**Why it matters:** Proxy discrimination is often illegal and always unethical

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##### 2.2 Cultural Identity Complexity

- Does the model allow for multi-faceted identity? (bilingual, bicultural, multi-ethnic)
- Are cultural identities flattened into simplified categories?
- Can the model handle code-switching and hybrid behavior patterns?
- Are regional and generational differences within cultures recognized?

**Priority:** ● CRITICAL

**Why it matters:** Simplified identities lead to stereotyping and missed opportunities

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##### 2.3 Cultural Context in Features

- Do model features include cultural context, not just demographics?
- Is cultural significance of behaviors captured? (shopping during Lunar New Year vs Christmas)
- Are cultural norms incorporated? (communication styles, decision-making patterns)
- Does the model understand that same behavior has different meaning across cultures?

**Priority:** ● HIGH

**Why it matters:** Context-free models misinterpret culturally specific behaviors

## 2.4 Name and Language Handling

- Does the model handle non-Western name formats correctly?
- Are multilingual inputs processed accurately without bias?
- Is transliteration handled properly? (Chinese names in Latin characters)
- Are name-based assumptions avoided? (inferring ethnicity, religion, or gender from names)

**Priority:** ● CRITICAL

**Why it matters:** Name bias is pervasive and immediately visible to affected users

## 2.5 Credential and Experience Recognition

- Does the model recognize international credentials as equivalent to domestic?
- Are non-traditional career paths penalized? (common in immigrant communities)
- Is international work experience valued appropriately?
- Are cultural differences in resume/CV format accommodated?

**Priority:** ● HIGH

**Why it matters:** Credential bias screens out qualified international talent

## 2.6 Model Fairness Testing Across Cultural Segments

- Have you tested model performance across cultural segments?
- Are accuracy, precision, and recall measured by cultural demographic?
- Have disparate impact analyses been conducted for cultural groups?
- Is model performance comparable across all served populations?

**Priority:** ● CRITICAL

**Why it matters:** Model may perform well on average but fail specific cultural groups

## 2.7 Stereotype Amplification Prevention

- Have you tested for stereotype amplification in outputs?
- Does the model avoid reinforcing cultural stereotypes?
- Are culturally offensive associations flagged and prevented?
- Is the model audited for subtle bias in recommendations or predictions?

**Priority:** ● CRITICAL

**Why it matters:** AI can amplify subtle biases into harmful stereotypes at scale

## MODEL STAGE - RED FLAGS TO INVESTIGATE:

- ⚠ **Name or language used as features without cultural intelligence**
  - ⚠ **Model assumes binary or simplified cultural categories**
  - ⚠ **No fairness testing across cultural segments**
  - ⚠ **International credentials treated as inferior to domestic**
  - ⚠ **Cultural patterns flagged as "anomalies" or "outliers"**
  - ⚠ **Model performs significantly worse for specific cultural groups**
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## MODEL STAGE - REMEDIATION ACTIONS:

- ✅ **Conduct proxy bias audit** - Identify indirect discrimination pathways
  - ✅ **Add cultural context features** - Don't rely on demographics alone
  - ✅ **Test fairness across cultures** - Disaggregate performance metrics
  - ✅ **Remove stereotype-reinforcing patterns** - Audit outputs for bias
  - ✅ **Implement cultural equivalency mappings** - Recognize international credentials
  - ✅ **Enable complex identity representation** - Allow multilayered cultural identity
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# STEP 3: DEPLOYMENT

## Preventing Algorithmic Optimization That Amplifies Harm

### Critical Questions:

#### OPTIMIZATION AND PERFORMANCE

##### 3.1 Optimization Metric Review

- Do your optimization metrics account for cultural fairness?
- Are you optimizing for aggregate performance at expense of cultural segments?
- Have you identified metrics that could amplify cultural bias?
- Are cultural equity metrics included alongside business metrics?

**Priority:** ● CRITICAL

**Why it matters:** Optimizing for averages can harm minority groups

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##### 3.2 Feedback Loop Analysis

- Have you mapped how user feedback affects the model?
- Could majority user feedback drown out minority needs?
- Are feedback loops tested for amplifying existing bias?
- Is cultural segment feedback weighted appropriately?

**Priority:** ● HIGH

**Why it matters:** Feedback loops can rapidly amplify small biases into large harms

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##### 3.3 Algorithmic Amplification of Harm

- Have you tested whether algorithm amplifies toxic content toward specific cultures?
- Are culturally offensive outputs surfaced more frequently than appropriate?
- Does personalization create cultural filter bubbles or stereotyping?
- Are recommendation systems tested for cultural bias in what they surface?

**Priority:** ● CRITICAL

**Why it matters:** Algorithms can amplify hate, stereotypes, or exclusion at scale

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### 3.4 Cultural Harm Prevention

- Is there a process to identify culturally harmful outputs before deployment?
- Are culturally diverse testers involved in pre-launch testing?
- Is there a mechanism to rapidly remove culturally harmful content?
- Are cultural sensitivities documented and monitored?

**Priority:** ● CRITICAL

**Why it matters:** Cultural harm damages brand and harms communities

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### 3.5 Gendered and Intersectional Harm

- Have you tested for amplification of gendered stereotypes in cultural contexts?
- Are intersectional identities considered? (e.g., Muslim women, Black LGBTQ+)
- Does the system avoid culturally specific gender bias?
- Are cultural norms around gender recognized without reinforcing harmful patterns?

**Priority:** ● CRITICAL

**Why it matters:** Intersectional bias compounds harm for most vulnerable users

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### 3.6 Performance Monitoring by Cultural Segment

- Are performance metrics tracked by cultural demographic?
- Is degraded performance for specific cultures flagged automatically?
- Are cultural segments experiencing different error rates?
- Is there visibility into how different cultures experience the system?

**Priority:** ● HIGH

**Why it matters:** Invisible failures for minority groups go undetected without segmented monitoring

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### 3.7 A/B Testing and Cultural Impact

- Are A/B tests evaluated for disparate cultural impact?
- Could optimizations help majority users while harming minority users?
- Are cultural segments represented in test populations?
- Is cultural fairness a test success criterion, not just engagement?

**Priority:** ● HIGH

**Why it matters:** Optimization can improve average metrics while harming specific groups

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## DEPLOYMENT STAGE - RED FLAGS TO INVESTIGATE:

- ⚠️ **Optimization metrics don't include cultural fairness measures**
  - ⚠️ **No monitoring of performance by cultural segment**
  - ⚠️ **Feedback loops favor majority users**
  - ⚠️ **A/B tests don't evaluate cultural impact**
  - ⚠️ **Harmful cultural content not proactively detected**
  - ⚠️ **Cultural minorities report worse experience than majority users**
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## DEPLOYMENT STAGE - REMEDIATION ACTIONS:

- ✅ **Add cultural fairness to optimization goals** - Don't optimize for average alone
  - ✅ **Monitor performance by cultural segment** - Make disparities visible
  - ✅ **Test for amplification of harm** - Proactively identify problematic patterns
  - ✅ **Implement cultural harm detection** - Flag and prevent offensive outputs
  - ✅ **Balance feedback loops** - Ensure minority voices aren't drowned out
  - ✅ **Include cultural equity in A/B test criteria** - Not just engagement metrics
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# STEP 4: GOVERNANCE

## Implementing Neutral Design and Strong Monitoring

### Critical Questions:

#### GOVERNANCE STRUCTURE

##### 4.1 Design Neutrality and Stakeholder Inclusion

- Were culturally diverse stakeholders involved in design decisions?
- Are cultural communities represented in governance structures?
- Is there a process for cultural communities to provide input?
- Are design decisions audited for cultural bias and neutrality?

**Priority:** ● CRITICAL

**Why it matters:** Non-neutral design embeds bias from the start

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##### 4.2 Accountability and Ownership

- Is there clear ownership of cultural intelligence and fairness outcomes?
- Are cultural fairness goals tied to performance reviews and compensation?
- Is there executive accountability for cultural bias incidents?
- Are teams incentivized to prioritize cultural intelligence?

**Priority:** ● HIGH

**Why it matters:** Without accountability, cultural intelligence remains aspirational

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##### 4.3 Monitoring and Measurement Systems

- Are cultural intelligence KPIs defined and tracked?
- Is ongoing monitoring in place for cultural bias in live systems?
- Are cultural harm incidents logged and analyzed?
- Is there real-time alerting for cultural fairness metric degradation?

**Priority:** ● CRITICAL

**Why it matters:** Weak monitoring means bias goes undetected until major harm occurs

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#### 4.4 Audit and Review Processes

- Are regular cultural intelligence audits conducted? (at least quarterly)
- Are third-party auditors engaged for independent assessment?
- Is there a cultural impact review before major releases?
- Are audit findings acted upon with documented remediation?

**Priority:** ● HIGH

**Why it matters:** Without audits, cultural bias compounds over time

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#### 4.5 Incident Response and Remediation

- Is there a cultural harm incident response process?
- Can affected cultural communities report issues easily?
- Is there rapid remediation when cultural bias is identified?
- Are root causes analyzed and systemic fixes implemented?

**Priority:** ● CRITICAL

**Why it matters:** How you respond to cultural harm defines your credibility

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#### 4.6 Transparency and Communication

- Are cultural intelligence practices disclosed publicly?
- Are known limitations and cultural gaps communicated to users?
- Is there transparency about how cultural data is used?
- Are cultural communities informed about changes affecting them?

**Priority:** ● HIGH

**Why it matters:** Transparency builds trust and accountability

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#### 4.7 Continuous Improvement and Learning

- Is there a process to incorporate cultural intelligence learnings?
- Are teams trained regularly on cultural bias and intelligence?
- Is cultural expertise developed internally or accessed through partnerships?
- Are cultural intelligence capabilities improving over time?

**Priority:** ● MEDIUM

**Why it matters:** Cultural intelligence requires ongoing learning, not one-time fixes

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#### 4.8 Policy and Documentation

- Are cultural intelligence policies documented and enforced?
- Is there a cultural bias assessment required for new features?
- Are cultural intelligence standards integrated into development processes?
- Is documentation accessible to diverse stakeholders?

**Priority:** ● HIGH

**Why it matters:** Undocumented practices aren't scalable or sustainable

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#### GOVERNANCE STAGE - RED FLAGS TO INVESTIGATE:

- ⚠ **No culturally diverse representation in governance**
  - ⚠ **Cultural intelligence metrics not tracked or reported**
  - ⚠ **No accountability for cultural bias incidents**
  - ⚠ **Monitoring systems don't segment by cultural demographics**
  - ⚠ **No incident response process for cultural harm**
  - ⚠ **Cultural intelligence not part of regular training or development**
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#### GOVERNANCE STAGE - REMEDIATION ACTIONS:

- ✅ **Establish cultural advisory board** - Include community representation
  - ✅ **Define cultural intelligence KPIs** - Track and report regularly
  - ✅ **Implement continuous monitoring** - Segment by cultural demographics
  - ✅ **Create incident response protocol** - Rapid remediation for cultural harm
  - ✅ **Conduct regular audits** - Internal and third-party assessments
  - ✅ **Build cultural intelligence training** - Ongoing team capability development
  - ✅ **Document policies and standards** - Make cultural intelligence requirements clear
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# CANADIAN MARKET CONTEXT

For organizations operating in Canadian markets, apply these additional considerations:

## Canadian-Specific Cultural Intelligence Requirements

### Data Stage - Canadian Context:

- Training data includes Canadian English and Canadian French variants
- Indigenous peoples represented and culturally contextualized appropriately
- Immigrant and diaspora communities distinguished from origin countries
- Regional differences captured (Québécois, Maritime, Prairie, BC cultures)
- Canadian multicultural policy framework reflected in data collection

### Model Stage - Canadian Context:

- Bilingual capabilities (English/French) as baseline, multilingual as goal
- Canadian credential recognition (international degrees common)
- Immigration and generational status incorporated appropriately
- Indigenous data sovereignty principles respected
- Canadian cultural moments recognized (Canada Day, Thanksgiving timing, Truth and Reconciliation Day)

### Deployment Stage - Canadian Context:

- Performance monitored across Canada's 200+ ethnic origins
- Optimization doesn't favor Toronto/Vancouver at expense of other regions
- Cultural harm prevention includes Indigenous cultural sensitivity
- French-language outputs have equal quality to English
- Accessibility across Canadian multicultural media ecosystem

### Governance Stage - Canadian Context:

- Compliance with Canadian privacy and anti-discrimination laws
- Indigenous consultation protocols followed where applicable
- Representation from Canada's major multicultural communities in governance
- Transparency reporting aligned with Canadian standards
- Partnership with Canadian multicultural organizations

# RESOURCES AND TOOLS

## For Implementation Support:

### Tulong Technologies - Cultural Intelligence AI Infrastructure

- Multicultural media marketplace
- Cultural intelligence data sets and APIs
- Cultural intelligence audit and services
- MQ (Multicultural Quotient) assessment services

Contact: [joycelyn@tulong.tech](mailto:joycelyn@tulong.tech) | [www.tulong.tech](http://www.tulong.tech)



### The Multicultural Mindset - Book

- Frameworks for building cultural intelligence
- Case studies of cultural intelligence success and failure



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## CULTURAL INTELLIGENCE AI AUDIT CHECKLIST FOR MARKETERS

### LEGAL DISCLAIMER

*This checklist is provided for educational and assessment purposes. It does not constitute legal advice. Organizations should consult with legal counsel regarding compliance with applicable anti-discrimination, privacy, and AI governance laws and regulations in their jurisdictions.*

*Cultural intelligence requirements continue to evolve. This checklist should be updated regularly to reflect emerging best practices, regulatory requirements, and community expectations.*