



WHISTLEBLOWER POLICY

(As of December 10, 2019)

1 Introduction

- 1.1 As a Life360 Innovations Holdings Inc. has the potential to be a reporting and/or publicly traded entity, the integrity and accountability of the financial, administrative and management practices of Life360 Innovations Holdings Inc. and its wholly or partially owned subsidiaries (collectively, the **Company**) are critical. These financial, administrative and management practices guide the decisions of the Company's Board of Directors (the **Board**) and are relied upon by investors of the Company and the financial markets.
- 1.2 For these reasons, it is critical for the Company to maintain a workplace where concerns regarding questionable business practices can be raised without fear of any discrimination, retaliation or harassment.
- 1.3 This Whistleblower Policy (the **Policy**) sets out the Company's framework for maintaining an effective workplace.

2 Reporting

- 2.1 All directors, officers, contractors and employees (**Company Individuals**) are encouraged to promptly report either orally or in writing to their immediate supervisor, all evidence of activity by the Company or a Company Individual that may constitute any of the following:
 - 2.1.1 Questionable accounting practices;
 - 2.1.2 Inadequate accounting controls;
 - 2.1.3 The misleading or coercion of auditors;
 - 2.1.4 Disclosure of fraudulent or misleading financial information;
 - 2.1.5 Instances of corporate fraud; and
 - 2.1.6 Activities in violation of anti-corruption laws.
- 2.2 In instances where a satisfactory response is not received from their immediate supervisor, or if they are uncomfortable addressing their



concerns to their supervisor, the complainant may contact any senior officer of the Company.

- 2.3 In instances where a satisfactory response is not received from such senior officer, or if they are uncomfortable addressing their concerns to a senior officer, the complainant may contact the Chairman of the Audit Committee of the Board by mail, telephone, fax or email as follows:

Robert Gayton Chairman, Audit Committee
Life360 Innovations Holdings Inc.
Suite 250 - 1075 West Georgia Street
Vancouver, V6CE 3C9
Phone: +1 604 638 2494
Mobile: +1 604 307 8558
Email: whistleblower@life360innovations.com

- 2.4 Anonymous written or telephone communications will be accepted.
- 2.5 Complainants are encouraged to provide as much specific information as possible including names, dates, places and events that took place, the complainant's perception of why the incident(s) may constitute any of the activities described above, and what action the complainant recommends be taken.
- 2.6 All complaints under this Policy will be promptly and thoroughly investigated, and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action and subject to applicable law.
- 2.7 All reports made to supervisors and senior officers in respect of matters specifically covered by this Policy will be reported to the Audit Committee of the Board.
- 2.8 Any Company Individual who in good faith reports such activities described above will be protected from threats of retaliation, harassment, discharge, or other types of discrimination including but not limited to those respecting compensation or terms and conditions of employment, that are directly related to such reports. If any such complainant believes they have been unfairly or unlawfully retaliated against in respect of a report made by such complainant under this



Policy, they may file a complaint with their supervisor or with a senior officer in instances where they are uncomfortable filing the complaint with their supervisor. If such a person is uncomfortable filing the complaint with a supervisor or any senior officer, they may file their complaint with the Chairman of the Audit Committee of the Board.

- 2.9 The Company reserves the right to take effective remedial action against any Company Individual who makes an accusation without a reasonable, good faith belief in the truth and accuracy of the information or who knowingly provides false information or makes false accusations. This action may include disciplinary measures up to and including the removal in the case of a director, termination in the case of an officer or employee, termination of the contract in the case of a contractor and, if warranted, legal proceedings.
- 2.10 All Company Individuals have a duty to co-operate in an investigation. Should a Company Individual fail to cooperate or provide false information in an investigation, the Company will take effective remedial action commensurate with the severity of the offense. This action may include disciplinary measures up to and including the removal in the case of a director, termination in the case of an officer or employee, termination of the contract in the case of a contractor and, if warranted, legal proceedings.

Amended and approved by the Board on December 10, 2019