Modern Slavery Statement 2021
Modern Slavery Statement

1. Opening Statement
1.1 At Life360, Inc., our mission is to bring families closer together and we recognise the importance of modern slavery as a significant worldwide problem. In staying true to our mission, Life360, Inc. is fully committed to preventing acts of modern slavery and human trafficking from occurring within in its own business or in its supply chains, and expects the same high standards from all of its contractors, suppliers and other business partners.

1.2 This statement is made for the reporting period 1 January 2021 to 31 December 2021.

2. Organisation
2.1 Life360, Inc. was incorporated in the State of Delaware in the United States of America in 2007. It was listed on the ASX in 2019.

2.2 The Company employs around 222 people and has offices in San Francisco, San Diego and Chicago. For the Jiobit product, the Company utilizes a primary manufacturer located in Malaysia, with the next largest vendors being distributors located in the US and Canada. The Company also sources some components from various countries across the world, primarily in Asia.

2.3 Life360, Inc. develops and sells subscriptions to the Life360 mobile application, which has location and driving safety features and is marketed for use by families. In September 2021, the Company acquired Jiobit, a provider of wearable location devices for young children, pets and seniors.

2.4 To find out more about the nature of Life360, Inc.’s business, please visit our website at https://www.life360.com.

3. Anti-Modern Slavery Policy
3.1 Life360, Inc. has developed an Anti-Modern Slavery Policy to reflect its commitment to acting ethically and with integrity in all of its business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its supply chains.

3.2 During the course of the next reporting period, Life360, Inc. will continue to engage with its:
   3.2.1 employees and contractors; and
   3.2.2 suppliers and other third party business partners,
   to ensure that they are aware of our approach to combating modern slavery risk and our corresponding expectations of them.

4. Due Diligence Processes for Combating Modern Slavery Risks
4.1 Life360, Inc. has in place systems to:
   4.1.1 establish and assess areas of potential risk in our business and supply chains;
   4.1.2 monitor potential risk areas in our business and supply chains;
   4.1.3 reduce or mitigate the risk of slavery and human trafficking occurring in our business and supply chains; and
   4.1.4 provide adequate protection for whistleblowers.

4.2 As part of our initiative to identify modern slavery and mitigate associated risks in our business and supply chain we have adopted the following due diligence procedures outlined below.
5. Risk Analysis of our Business Operations

5.1 Our business, during the 2021 reporting period, was organised into two business units being the Life360 mobile application and Jiobit hardware tracking device. The Life360 mobile application is intended for families with features that range from communications to driving safety and location sharing. The Jiobit hardware tracking device is intended for young children, pets, and seniors with features that range from real-time tracking to location history.

5.2 Having completed a risk analysis of our business operations, Life360, Inc. considers that its operations continue to present low levels of modern slavery risk. In particular:

5.2.1 The Life360 mobile application has a subscription-based Software-as-a-Service (SaaS) business model and its suppliers primarily include technology hosting services, and contractors and other outsourced service providers that support the mobile application.

5.2.2 The Jiobit hardware tracking device has a subscription attached hardware business model and its suppliers primarily include technology and hosting services, contract manufacturer, IT and hardware service providers, and logistics partners.

6. Risk Analysis of our Supply Chains and Third Party Business Partners

6.1 Life360, Inc. has also completed a modern slavery risk assessment of its supply chain and third party business partners.

6.2 To date, the focus of this risk assessment has been on Life360, Inc.’s suppliers providing services in excess of $300,000 over the relevant reporting period (which represents 71% overall spend for the year), and the geographical profile of our supplier base. This risk assessment was undertaken in line with key external guidance such as the Global Slavery Index and also by reference to industry, country, product and services risk profile.

6.3 Life360, Inc. has determined that the risk of modern slavery practices occurring in our operations and supply chains continues to be low. While recognizing that some of our suppliers are based in countries that have a higher perceived level of risk of modern slavery, Life360, Inc. does not believe we have any material exposure to modern slavery arising in connection with our relationship with these suppliers given the nature of the services these suppliers provide to us, and based on our due diligence and our understanding of their employment practices and conditions.

7. Monitoring our Modern Slavery Program

7.1 During the Reporting Period, we have monitored the effectiveness of the measures that we have implemented to mitigate modern slavery risks in our business operations and supply chain. Our monitoring efforts have led to some of the following improvements to the Program:

7.1.1 we have delivered specific modern slavery training to all Life360 employees and executives with PO approval authority;

7.1.2 we have implemented Descartes Visual Compliance Restricted Party Screening tool to screen existing and new vendors against denied party lists; and

7.1.3 we began including contractual obligations reinforcing our business partners’ commitment to compliance with modern slavery laws in new contracts in excess of $200,000 in value.
8. Further Steps

8.1 Life360, Inc. is committed to continuous improvement to address the challenging and complex issue that is modern slavery.

8.2 During the course of the next reporting period, Life360, Inc. will:

8.2.1 update its modern slavery risk assessment in order to understand whether its modern slavery risk profile has changed;

8.2.2 survey any suppliers and other third party business partners who are identified as medium and high risk in the updated risk analysis; and

8.2.3 determine appropriate additional steps to combat modern slavery risk depending on the business partners’ responses to the surveys.

8.3 In addition to the steps outlined above, we will look to implement one or more of the following as we determine appropriate in order to ensure that the risks of modern slavery occurring in our operations and supply chains remains low:

8.3.1 deliver additional modern slavery training and awareness for employees who are more likely to require an enhanced awareness of modern slavery or human trafficking risks due to the nature of their roles. This will include staff in areas such as Procurement, the People team, recruitment specialists, Facilities staff as well as anyone who is involved in purchasing paper products or IT hardware; and/or

8.3.2 implementation of a ‘supplier code of conduct’ which sets out Life 360, Inc.’s expectations with respect to compliance and modern slavery laws and which requires our suppliers to maintain accountability within their own supply chains.

9. Consultation and Approval

9.1 This statement is made in accordance with the Australian Modern Slavery Act 2018 (Cth) and constitutes Life360, Inc.’s modern slavery statement for the financial year commencing 1 January 2021 and ending 31 December 2021.

9.2 This statement was approved by the Board of Directors of Life360, Inc. on June 27, 2022.

John Philip Coghlan
Chairman
Date: 27 June, 2022

1 Produced by the Walk Free Foundation – see www.globalslaveryindex.org