

LIFE360, INC.
ANTI-CORRUPTION POLICY
(Effective June 7, 2024)

I. PURPOSE

LIFE360, INC. (together with its subsidiaries, “*Life360*” or the “*Company*”) has implemented this Anti-Corruption Policy (the “*Policy*”) for the purpose of ensuring compliance with the U.S. Foreign Corrupt Practices Act of 1977, as amended (the “*FCPA*”), the U.S. Travel Act, the U.S. Domestic Bribery Statute, the UK Bribery Act, the Australian Anti-Money Laundering and Counter-Terrorism Financing Act 2006, the Australian Criminal Code Act 1995, and all other anti-corruption laws and regulations applicable to the Company’s business anywhere in the world. This Policy applies to all world-wide directors, officers, employees, and individuals serving as independent contractors of the Company or its subsidiaries (collectively, “*Personnel*”). Please report all questions or concerns to the Company’s General Counsel whose contact information appears below.

II. POLICY STATEMENTS

Life360 Personnel are strictly prohibited from promising, offering, providing, or authorizing cash payments (such as bribes or kickbacks) or anything else of value directly or indirectly to any person to achieve an improper purpose related to the Company’s business.

Life360 Personnel are also strictly prohibited from requesting, agreeing to receive, or accepting money or anything else of value from any person to achieve an improper purpose related to the Company’s business.

Life360 Personnel must comply with all of the Company’s internal controls, especially those designed to (i) ensure accurate and complete books and records and (ii) otherwise prevent corruption, self-dealing, embezzlement, fraud, money laundering, or other improper activities.

There are no exceptions to this Policy, even if Life360’s competitors engage in improper behavior or corruption is an accepted practice in a country where Life360 operates. Life360 Personnel are required to adhere to both the spirit and the letter of this Policy with respect to Life360’s business anywhere in the world.

III. ANTI-BRIBERY PROHIBITIONS

The FCPA and other anti-bribery and anti-corruption laws prohibit Life360 and Life360 Personnel from corruptly promising, offering, providing, or authorizing the provision of money or anything of value directly or indirectly to a government official and certain other persons to achieve an improper purpose. “Improper purposes” include influencing any act or decision of the recipient in his/her official capacity, inducing the recipient to do or omit to do any act in violation of his/her lawful duty, inducing the recipient to influence any act or decision of a government or instrumentality of a government, or securing any improper advantage, in order to obtain, retain, or direct regulatory approvals, contracts, business, or other benefits.

The FCPA prohibits improper payments provided to officials of governments, state-affiliated entities, and political parties outside the United States. However, the provision of improper benefits to government or private-sector recipients within the United States will violate U.S. domestic bribery statutes.

In addition to the United States, many other countries have promulgated their own anti-bribery legislation. Most of those countries prohibit making improper payments to government and private-sector recipients within their borders. However, several countries have also adopted legislation similar to the FCPA that prohibit improper payments outside those countries. The existence of all of these laws means that there is potential for a company or an individual to face liability in several countries for the same single act of corruption. One of the leading anti-corruption laws other than the FCPA is the UK Bribery Act. Attachment 1 contains an overview of that law.

Given the broad prohibitions under the FCPA and other anti-corruption laws applicable to the Company, this Policy prohibits bribes, kickbacks, and the provision of other improper benefits and advantages to *any* person, entity, or organization, including, but not limited to, employees, officials, representatives, or agencies of any

- government;
- state-owned or affiliated entity, including, but not limited to, a state hospital, research institution, utility, public university, or sovereign wealth fund;
- public international organization such as the United Nations or the World Bank;
- political party, including the party itself as well as candidates for public office;
- non-governmental organization, including a sports federation such as FIFA or the International Olympic Committee; or
- private-sector company.

One may be asked by certain parties to provide a bribe or other improper benefit in exchange for

- the award of a contract, sponsorship opportunity, or other business;
- the issuance or renewal of a concession, license, or business, construction, or other permit or registration;
- the successful filing of a patent or trademark application;
- an impermissible reduction in duties or other taxes;
- securing the purchase of state-owned land or other public assets;
- avoiding mandatory inspections;

- obtaining a favorable inspection result or court decision, even if the facts or circumstances do not support such a result; or
- the grant of some other improper advantage.

This Policy prohibits Life360 Personnel from providing bribes or other improper benefits to any person to achieve any of the above purposes.

A violation of this Policy can occur even if the bribe fails to achieve the purpose for which it was intended. This means that a person can violate this Policy if that person provides an improper payment or benefit to a recipient and the recipient does not grant any business or other advantage in return. In addition, the mere offer or promise of a bribe or other improper benefit is sufficient to cause a violation. All of the anti-bribery prohibitions contained in this Policy apply irrespective of whether one uses Company funds or personal funds to finance improper payments or other benefits.

This Policy also prohibits Life360 Personnel from soliciting or accepting bribes, kickbacks, or other improper payments/benefits from the Company's vendors or other persons in relation to Life360's business. For instance, a violation of this Policy will occur if you cause the Company to overpay a vendor and that vendor then shares all or a portion of that overpayment with you.

This Policy requires Life360 Personnel to adhere to high ethical standards and to comply with all applicable laws in the course of performing services for the Company. FCPA and other anti-corruption violations typically involve circumstances that also result in violations of other laws, including those that address money laundering, embezzlement, fraud, export controls, and sanctions/embargoes. Guilty persons can face multiple charges based on the same set of facts.

IV. ACCOUNTING REQUIREMENTS

Life360 adheres to certain accounting requirements. Specifically, the Company must maintain books, records, and accounts, which, in reasonable detail, accurately and fairly reflect the Company's transactions, expenses, and asset dispositions. Life360 is also committed to maintaining a system of internal accounting controls to provide reasonable assurances that transactions are properly authorized by management, executed, and recorded. This means that Company Personnel must comply with Life360's internal controls and avoid unauthorized activities or expenses. Life360 Personnel must also cooperate with the Company's periodic audits and other efforts to ensure that Life360's internal controls are being observed.

Violations of the above accounting standards can occur if one conceals bribes or falsifies other transactions or expenses, even if they are not related to a bribe, in the Company's ledgers or other records. Also, there is no materiality standard. This means that even small misreported amounts may result in violations.

V. FACILITATION PAYMENTS

This Policy prohibits all corrupt payments or benefits, including so-called grease, speed, or facilitation payments provided to government officials in their personal capacity to expedite or secure routine government actions (collectively, "*Facilitation Payments*"). Facilitation Payments include payments to a

government official to expedite routine and nondiscretionary activities, such as processing permit and license applications, scheduling inspections, and/or providing infrastructure services (*e.g.*, water, electricity mail). Life360 strictly prohibits the offer, promise, or provision of Facilitation Payments to any U.S. or foreign local or federal government official, as they can violate anti-corruption laws and regulations.

Please note that in some cases, government agencies may impose *official* fees that may be paid directly in the name of a governmental entity or enterprise itself, as set out in published fee schedules or other official documents. These *official* government fees can be paid to expedite passports, licenses, or other services, provided that they are deposited in the treasury of a government, an official government receipt is collected, and the expense is accurately recorded in the Company's books. However, Facilitating Payments provided for the benefit of government officials in their *personal* capacity (*i.e.*, are not deposited in an official treasury account belonging to a government) will violate this Policy.

VI. INTERMEDIARIES AND BUSINESS PARTNERS

This Policy prohibits the provision of bribes or other improper benefits directly as well as indirectly through third parties whether in or outside the United States. This risk can arise in cases where the Company works with agents, consultants, representatives, lobbyists, suppliers/vendors, resellers, distributors, customs or other brokers, contractors, advisors, other business partners, or anyone else that performs services for or on behalf of the Company (collectively "*Intermediaries*").

In certain cases, Life360 and Life360 Personnel can be held liable under the FCPA and other laws *even if* they do not expressly authorize an Intermediary to engage in corruption, but they do so anyway. This can occur if one (i) has actual knowledge or a firm belief that a person will engage in corruption or (ii) consciously disregards, deliberately ignores, or is willfully blind to the Intermediary's corrupt or improper practices.

Given these risks, this Policy forbids Life360 from using or paying any Intermediary responsible for government interactions unless (i) appropriate anti-corruption due diligence is performed and confirms that the Intermediary does not have a history or reputation for corruption or similar wrongdoing and (ii) the Intermediary has executed a written agreement containing anti-corruption compliance clauses. Please confer with the Company's General Counsel on appropriate due diligence measures and anti-corruption clauses.

Throughout any relationship with an Intermediary, the Company must monitor their performance to ensure that they do not engage in activities that raise FCPA/corruption concerns. The General Counsel can guide you on the types of red flags that one should monitor before and *after* engaging an Intermediary.

This Policy requires Life360 Personnel to notify the General Counsel if they learn of any Company Intermediary that engages in corrupt or other improper practices. Also, all payments to Intermediaries or other vendors must be accurately reported in Life360's books and records in accordance with the accounting requirements discussed above.

VII. GIFTS & HOSPITALITIES

The FCPA and other laws prohibit the provision or acceptance of money or things of value for corrupt or improper purposes. A violation of this prohibition is likely in instances where personal benefits are given or accepted in the course of negotiation or tender bid. However, reasonably priced gifts, meals, entertainment, travel, and other benefits provided for non-corrupt business promotion or goodwill purposes may be permissible under the FCPA and other anti-corruption laws in certain cases. For instance, a plastic pen, a t-shirt, a coffee mug, a paper weight, or a hat of moderate value and embossed with the Company's logo will generally not violate the FCPA. However, a fur coat, a car, or a vacation will raise FCPA and other anti-corruption concerns, especially if such benefits are provided to a government official or other person who is responsible for making decisions in relation to the Company's business.

In addition to complying with the FCPA, Life360 Personnel must also ensure that the provision of a gift or other benefit does not violate local laws or policies that apply in the country where the recipient of the benefit is located. Some countries impose express limits on the value of gifts/benefits that a recipient can accept; other countries ban such gifts/benefits altogether even if given with no corrupt or improper intention.

Life360 Personnel must obtain the approval of the General Counsel prior to providing gifts, meals, travel benefits, and other hospitalities to employees, officials, or agents of any government, political party, state-owned entity, or public international organization. The General Counsel will help determine whether the provision of the benefit is permissible under the FCPA and local law. If the expense is approved, its value and business purpose must be recorded accurately in the Company's books. Cash and gift cards or gift certificates that can easily be converted into cash are strictly prohibited.

VIII. OTHER ACTIVITIES

Corruption concerns can arise in a number of other cases including, but not limited to (i) joint ventures or teaming arrangements with public or private-sector partners; (ii) mergers and acquisitions, especially if the target business has significant government interactions or an international profile; or (iii) the provision of political or charitable contributions. Please confer with the General Counsel before engaging in these types of activities to ensure that appropriate anti-corruption compliance measures are observed.

IX. VIOLATIONS AND CONSEQUENCES

A violation of this Policy will result in appropriate disciplinary action, including demotion, reassignment, additional training, probation, suspension, or even termination.

The FCPA is a criminal statute. Both Life360 and Life360 Personnel may be subject to substantial fines and penalties for violating these and other anti-corruption laws. In serious cases, individuals may face imprisonment for up to five years for each FCPA anti-bribery violation and up to 20 years for each FCPA accounting violation. In addition, the Company may face suspension or debarment from government contracts, the loss of U.S. export privileges, and certain other consequences.

Anti-corruption enforcement has significantly increased in the United States. In addition, a number of other countries have strengthened their laws on this matter. This means that Life360 can face liability across multiple jurisdictions for the same corrupt act.

X. TRAINING AND CERTIFICATION

Designated personnel must undergo anti-corruption training provided by the Company. The nature, content, and frequency of that training will be determined by the Company based on risk profile.

You will be asked to execute an electronic certification acknowledging that you have read and will comply with this Policy.] The Company may require designated personnel to recertify compliance with this Policy on a periodic basis.

XI. STATUS

This Policy does not form part of any employment contract with you and may be amended at any time. This Policy should be read in conjunction with the Company's Code of Business Conduct and Ethics and other policies and procedures.

XII. REPORTING/QUESTIONS

Life360 Personnel have an affirmative obligation to report all violations of this Policy to the General Counsel as follows:

Susan Stick
General Counsel and Corporate Secretary
sstick@life360.com

Reports may also be submitted anonymously by using the Company's Compliance Hotline as described in the Company's Whistleblower Policy for Accounting and Auditing Matters. However, Life360 encourage you to consider revealing your identity so that the Company can properly follow up and investigate alleged violations. The Company will ensure that appropriate confidentiality measures are taken and will not retaliate against any individual for reporting violations in good faith.

Life360 Personnel must also notify the General Counsel of any corrupt, improper, illegal, or other unusual requests for payments or other benefits made by customers, Intermediaries, vendors, business partners, government officials, or Company employees.

ATTACHMENT 1

THE UK BRIBERY ACT 2010

Among various matters, the UK Bribery Act 2010 (the “UKBA”) prohibits individuals and entities from offering, promising, or giving (directly or indirectly through a third party) a financial or other advantage to a recipient with (i) the intention that the advantage induce the recipient to perform improperly a relevant function or activity or to reward a person for the improper performance of such function or activity, or (ii) the knowledge or belief that the acceptance of the advantage would itself constitute an improper performance of a relevant function or activity. A violation of the UKBA will occur irrespective of whether the recipient of an improper payment or advantage is a government official or an employee of a private-sector entity.

The UKBA contains four principal offenses as follows: (i) offering, promising, or giving of a bribe to another person (Section 1); (ii) requesting, agreeing to receive, or accepting a bribe (Section 2); (iii) bribery of a foreign (non-UK) public official (Section 6); and (iv) failure by certain commercial organizations to prevent Section 1 or 6 bribery offenses by their associated persons (including employees, contractors, Intermediaries, or anyone else performing services for or on behalf of a company) of any nationality anywhere in the world (Section 7). The UKBA provides a statutory defense to a Section 7 violation for companies that can demonstrate that they had in place adequate systems and controls designed to prevent offenses under UKBA. This Policy is part of the Company’s overall effort to establish such systems and controls.

Courts in the United Kingdom exercise broad jurisdiction over UK as well as non-UK persons who commit UKBA offenses. Accordingly, there could be circumstances where the Company’s non-UK entities and employees could be subject to UKBA jurisdiction.

Under the UKBA, individuals guilty of bribery may be subject to imprisonment for up to 10 years and/or subject to a fine of an unlimited amount. Commercial organizations guilty of bribery or failure to prevent bribery may also be subject to a fine of an unlimited amount as well as debarment from government contracts. In addition, UKBA offenses could result in violations of other laws such as the UK Proceeds of Crime Act 2002, which contains the UK’s principal money laundering offenses.

ATTACHMENT 2

CERTIFICATION

I hereby certify that I have read and am in compliance with the Anti-Corruption Policy (the “*Policy*”) of Life360, Inc. (together with its subsidiaries, the “*Company*”). Neither I nor, to my knowledge after due inquiry, any of my direct or indirect reports nor any Company contractor or business partner with which I or they work has offered, provided, solicited, or accepted a bribe, kickback, or other improper payment/benefit or has otherwise taken any actions that would result in a violation of (i) the Policy or any employee handbook, code of conduct, or other policies or procedures of the Company that have been provided to me; (ii) the U.S. Foreign Corrupt Practices Act of 1977, as amended; or (iii) any other anti-corruption or other law or regulation such as the UK Bribery Act 2010 to the extent applicable. I will notify the Company’s General Counsel if, at any time, I learn of or suspect such violation.

Name:

Title:

Date: