

WHISTLEBLOWER POLICY

Limeade is committed to lawful and ethical behavior in all of its activities and has adopted this Whistleblower Policy to encourage employees to raise any concerns and report instances of illegal or unethical behavior without fear of reprisal. This policy establishes mechanisms and procedures for employees to report unethical or illegal conduct in a manner that protects the individual and provides the necessary information for Limeade to investigate the report and act appropriately.

1. Introduction. Through its corporate values, Limeade seeks to create an environment in which every employee can do their best work to delight our customers. This environment depends, in part, on ensuring that all employees feel comfortable that they can live our values of “speak plainly” and “own it” by discussing concerns about improper conduct openly and honestly without fear of retaliation or adverse consequences on their jobs. This policy provides mechanisms through which employees may report concerns about potentially illegal or unethical conduct confidentially and without any fear of retribution or retaliation.

If at any time an employee has a concern regarding the propriety or legality of any action (please note that in Germany a report regarding only minor or merely suspected violations should be avoided) taken or contemplated to be taken by any Limeade employee, contractor, or vendor, or if action needs to be taken for Limeade to comply with the law or appropriate ethical standards, Limeade encourages the employee to voice the concern promptly. This is consistent with Limeade’s values and reputation as a great place to work; it also serves to protect Limeade.

2. Scope. For purposes of this policy, a “Whistleblower” is any employee who uses the below- described processes to report an activity or contemplated activity that the employee reasonably considers to be illegal, dishonest, unethical, fraudulent, or otherwise improper. Examples of conduct that may fall under this policy include violations of law, billing irregularities, violations of company policies, and other improper conduct. A Whistleblower is entitled to the protections set forth herein even if a subsequent investigation determines that the conduct complained of was not improper—the Whistleblower does not have to be “right” in order to be protected. A Whistleblower may lose the protections afforded by this policy, however, if the Whistleblower intentionally submits a false report of wrongdoing, attempts to use this policy for improper purposes, or otherwise acts in bad faith.
3. Procedure. If an employee has a reasonable concern that the type of conduct described above has occurred, is occurring, or is being contemplated, the employee should immediately contact their manager to report the concern. If an employee does not feel comfortable reporting the concern to their manager (or if their manager is involved in the concern), the concern may be reported to: (i) any other manager in their reporting chain; (ii) their department lead/VP; (iii) the Chief People Officer or VP of Legal; or (iv) the Chief Executive Officer. Alternatively, employees may at any time submit concerns through the NAVEX Global (EthicsPoint) website or telephone hotline. All submissions received through NAVEX Global (EthicsPoint) will be promptly reviewed.

Once a concern has been reported through any mechanism described above, it will be forwarded to the Chief People Officer for investigation or, if the Chief People Officer is involved in the concern, to the VP of Legal. These resources are responsible for investigating the matter and coordinating any response or corrective action. The Whistleblower is not responsible for investigating or resolving the concern or for determining fault—that is the responsibility of appropriate company executives or, as appropriate, outside legal counsel.

When a material issue is raised under this policy (as determined by the Chief People Officer, the VP of Legal, or outside legal counsel), an appropriate disclosure will be made to the Limeade Board of Directors regarding (i) the concern raised; (ii) the status of the investigation; (iii) any determinations about underlying causes for any improper conduct; and (iv) any corrective action taken or proposed. This disclosure is intended to ensure Board awareness and to facilitate improvements to eliminate and avoid improper conduct at Limeade.

4. Protection. Whistleblowers who utilize this policy in good faith are entitled to protection in two important and independent areas: confidentiality and retaliation. Where possible, Limeade will take all reasonable efforts to keep the Whistleblower's identity confidential. There may be circumstances where confidentiality cannot be maintained, however, such as during the course of an investigation, to comply with law, or (in an extreme case) to afford those involved with their legal right to defend themselves against accusations. Limeade takes confidentiality seriously and will not intentionally disclose a Whistleblower's identity unless it is necessary. Limeade will make every effort to notify the Whistleblower before making such disclosures.

Limeade prohibits and will not tolerate any retaliation against a Whistleblower. This means that the employee will not be discharged, demoted, threatened, or harassed, or otherwise discriminated against in any way with respect to compensation, promotion, work assignments, or any other terms, conditions, or privileges of employment at Limeade for raising legitimate concerns under this policy. If a Whistleblower believes they are being retaliated against, they should immediately notify the Chief People Officer or, if the Chief People Officer is involved, the VP of Legal. If both of these people are involved, any concerns about retaliation should be raised with the Chief Executive Officer.

5. Training. Compliance with this policy is the responsibility of every Limeade employee— whether they are raising or responding to concerns. As such, Limeade will conduct periodic training (including during onboarding) for all employees about this policy and the protections it affords. Similarly, all managers will be trained on this policy both with respect to how they can voice their own concerns and, importantly, how to respond when they receive reports under this policy. Finally, all Limeade executives at the VP level or higher will also receive training about their obligations when they receive reports under this policy. The People Team (and the Legal Team as appropriate) will periodically evaluate the effectiveness of this policy and will recommend any required or suggested substantive changes to the Limeade Board for consideration and adoption.