



Whistleblower Policy

Policy Overview

The purpose of this policy is to reinforce the business integrity of ContextLogic Inc. (d/b/a Wish) and its subsidiaries (collectively, the “**Company**”), by providing a safe and reliable means for employees and others to report concerns they may have about conduct at the Company. By following this policy, you can raise concerns, confidentially and anonymously if desired, and free of any retaliation, discrimination, or harassment.

Whether you are an employee, an officer or director, an independent contractor, or someone who does business with us, we ask that you bring to light good faith concerns regarding the Company’s business practices.

We ask that you follow this policy to report good faith concerns regarding any of the following:

- Suspected violations of law, our Code of Conduct, or other Company policies, which we refer to in this policy as “**General Matters**” or
- Questionable accounting, internal accounting controls, or other auditing or financial matters; the reporting of fraudulent financial information; or potential violations of securities laws, which we refer to in this policy as “**Financial Matters.**” Financial Matters can include, but are not limited to:
 - Any fraud or deliberate error in preparing, evaluating, reviewing, or auditing any financial statement;
 - Any fraud or deliberate error in recording or maintaining of financial records;
 - Any deficiencies in, or lack of compliance with, internal accounting controls;
 - Any misrepresentation or false statement regarding a matter contained in, or affecting, any financial record, financial report, or audit report; or
 - Any deviation from full and fair reporting of the Company's financial condition or results.

If called upon, we also ask that you provide truthful information in connection with an inquiry or investigation by a court, an agency, law enforcement, or any other governmental body.

Who does this Policy apply to?

This policy applies to all employees, officers, directors, and independent contractors of the Company, all of whom we will refer to collectively as “**employees**” or “**you**” throughout this policy. In this policy, “**we,**” and “**our**” refers to the Company.

As an employee of the Company, if you are aware of a General Matter or Financial Matter and do not report it according to this policy, your inaction may be considered a violation itself, which may result in disciplinary action, up to and including termination of your employment or any other relationship that you may have with the Company.

This policy only applies to reports made in good faith with reasonable belief in the accuracy of the report. Reports that are made in bad faith, with malicious intent, or with the knowledge that they were false may result in disciplinary action, up to and including termination of employment.

Reporting and Investigation

If you have a good faith belief that a General Matter or Financial Matter has occurred or is occurring, we encourage you to promptly:

- discuss the situation with your manager;
- if you are uncomfortable speaking with your manager or believe your manager has not properly handled your concern, contact the Head of HR, General Counsel, Chief Financial Officer, Internal Audit, and/or Chief Compliance Officer; or
- if you do not believe your concern is being adequately addressed, or you are not comfortable speaking with one of the above-noted contacts, report your concern via the methods listed below, through which you may choose to identify yourself or remain anonymous:
 - By email to compliance@wish.com (note that this will only be anonymous if your email address is unrecognizable to the Company);
 - Via our ethics hotline online at wishemployee.ethicspoint.com; or
 - By phone at:
 - UNITED STATES: 1-844-361-0786
 - CANADA: 1-844-361-0786
 - CHINA: Global Inbound Services (GIS) 400-6-612-179
 - NETHERLANDS: Global Inbound Services (GIS) 0800-3800012

Receipt of the report will be acknowledged to the sender within a reasonable period following receipt if an address for response is supplied.

All reports of a General Matter or Financial Matter will be taken seriously and will be promptly investigated. The Company asks any person submitting a report to provide as much information as possible along with the report, especially if the report is being made anonymously. The Company may not be able to fully investigate a report if insufficient information is provided.

The specific action taken in any particular case depends on the nature and gravity of the conduct and the results of the investigation. If a General Matter or Financial Matter has been reported and confirmed, we

will take corrective action proportionate to the seriousness of the offense. This action may include, but is not limited to, disciplinary action against the accused party, up to and including termination of employment (or any other working relationship that the offending party may have with the Company). Reasonable and necessary steps will also be taken to prevent any further General Matter or Financial Matter.

Handling Reports

- All reports of General Matters or Financial Matters, **except for** those that are purely employee relations or Human Resources (HR) matters, will be entered into a tracker, which will include, among other things: (1) information regarding the date the report was received, (2) a description of the report, (3) the submitter (if provided), and (4) the status and disposition of an investigation of the report.
- Employee relations or HR matters will be logged separately and will be forwarded to the appropriate person or department for investigation (e.g., Human Resources), unless the General Counsel or Chief Compliance Officer determines that other treatment is necessary.
- The General Counsel or Chief Compliance Officer will promptly report to the Audit Committee: (1) reports of General Matters or Financial Matters that, if substantiated, could result in significant reputational harm, criminal charges, or a material adverse impact on the Company's financial statements, (2) matters related to our executive officers, and (3) such other matters as the General Counsel deems significant or material. The Audit Committee shall direct and oversee an investigation of such reports, as it determines to be appropriate. The Audit Committee may also delegate the oversight and investigation of such reports to the appropriate members of our management.
- All other reports of General Matters or Financial Matters shall be reviewed under the direction and oversight of the General Counsel or Chief Compliance Officer, who will involve such other parties (e.g., members of the Finance Department or outside advisors) as deemed appropriate. The General Counsel or Chief Compliance Officer shall provide the Audit Committee with a quarterly report of all reports received and an update of pending investigations. The Audit Committee may request special treatment for any report and may assume the direction and oversight of an investigation of any such report.
- The Audit Committee shall have full access to all complaint and investigation documentation at all times. The Audit Committee also has the authority to retain outside legal, accounting, or other expertise in any investigation as it deems necessary to conduct the investigation in accordance with its charter and this policy.
- Notwithstanding the foregoing, in no event will any employee of the Company, including the Chief Compliance Officer, General Counsel, or Chief Financial Officer, be involved in any aspect of conducting the investigation of any report if the report alleges that s/he specifically was involved in the matter.

Confidentiality

Information disclosed during the course of the investigation will, to the extent practical and appropriate, remain confidential, except as may be reasonably necessary under the circumstances (e.g., to facilitate the investigation, take remedial action, or to comply with applicable law or court order).

For any General Matter or Financial Matter not reported through an anonymous report, we will advise the reporting employee that the General Matter or Financial Matter has been addressed and, if we are able, of the specific resolution. However, due to confidentiality obligations, there may be times when we will not be able to provide the details regarding the corrective or disciplinary action that was taken or not taken.

No Retaliation

The Company takes its non-retaliatory obligations seriously and will not allow anyone to take adverse action, threaten, intimidate, or retaliate against an employee who reports a General Matter or Financial Matter in good faith or cooperates in an investigation. The Company considers retaliation itself a violation of this Policy and the Code of Conduct and will respond accordingly.

If you believe that you have been subject to retaliation for having made a report in compliance with this Policy or for having participated in any investigation relating to a General Matter or Financial Matter, please immediately report the alleged retaliation to the Head of HR, General Counsel, Chief Financial Officer, or Chief Compliance Officer. If, for any reason, you do not feel comfortable discussing the alleged retaliation with these people, please immediately report the alleged retaliation through the ethics or reporting hotline online and by phone as noted above. Bringing any alleged retaliation to our attention enables us to promptly and appropriately investigate the reported retaliation in accordance with the procedures outlined above. If a complaint of retaliation is proven to be true, appropriate disciplinary action will be taken against the accused party, including but not limited to termination of employment (or any other working relationship that the accused may have with the Company).

Additional Enforcement Information

The Company endeavors to operate on a highly transparent basis and we want to be made aware of any alleged wrongdoings and address them as soon as possible. However, nothing in this Policy is intended to prevent any employee from reporting information to federal, state, or local law enforcement agencies when an employee has reasonable cause to believe that a violation of federal, state, or local law has occurred. A report to law enforcement agencies may be made instead of, or in addition to, a report directly to the Company through its management or the ethics hotline.

Retention

The Chief Compliance Officer or designee will retain a copy of the summary logs, all submitted reports, and all substantive documents provided or generated pursuant to any investigation hereunder for a period of not less than seven years.

Modification

We are committed to continuously reviewing and updating our policies, and therefore reserve the right to amend this policy at any time, for any reason, subject to applicable law.