BETTERLIFE PHARMA INC.

CORPORATE TREASURY INVESTMENT POLICY

Adopted by the Board of Directors on October 16, 2026

I. Purpose & Scope

This Investment Policy Statement (the "**Policy**") establishes the guidelines and governing framework for managing the corporate cash, cash equivalents, and investable funds (the "**Treasury Assets**"), and the short-term investment portfolios of BetterLife Pharma Inc. (the "**Company**") established with the Treasury Assets (the "**Portfolio**"). This Policy applies to all Treasury Assets of the Company and its consolidated subsidiaries.

II. Investment Objectives

The management of Treasury Assets shall adhere to three core objectives, ranked in order of absolute priority:

1. **Safety and Preservation of Capital:** Investment choices must minimize risk to the Treasury Assets and the Portfolio. Speculative trading is strictly prohibited.
2. **Liquidity Maintenance:** The Portfolio must remain structured to ensure the Company can meet all operating obligations, payroll demands, research and development expenditures, capital expenditures (if any), and potential mergers and acquisitions.
3. **Maximization of Return (Yield):** Subject to satisfying the safety and liquidity constraints above, the Treasury Team (defined below) will seek a competitive market rate of return.

III. Governance and Delegation of Authority

- **Board of Directors (or Audit Committee):** Holds ultimate fiduciary responsibility. The Board must approve this Policy and any subsequent structural modifications.
- **Chairman of the Audit Committee**: Oversees the initial investment of the Treasury Assets in the Portfolio and reviews the Portfolio on a quarterly basis with the Chief Financial Officer and the Treasury Team.
- **Chief Financial Officer:** Oversees execution and ensures Treasury Team compliance with this Policy.
- **Treasurer or Controller/Vice-President, Finance (collectively with Chief Financial Officer, the "Treasury Team"):** Manages day-to-day transaction processing, choosing specific investments, and buying and selling approved securities and assets within the bounds of this Policy.

IV. Permitted Investment Instruments

The Company may only invest surplus cash in the following high-grade, dollar-denominated vehicles:

Investment Type	Maximum Maturity	Minimum Credit Rating Required	Maximum % Allocation of Total Portfolio
US Treasuries	3 years	N/A (Sovereign Backed)	100%
Certificates of Deposits (US) issued by FDIC insured institution	3 years	Aa3 / A+ / AA / AA (low)	100%
Government of Canada Securities	3 years	N/A (Sovereign Backed)	40%*
Guaranteed Investment Certificate (Canada) or USD Term Deposits (Canada)	3 years	Aa3 / A+ / AA / AA (low)	40%*
Commercial Paper	270 days	R-1 (low) / A-1 (low)	40%*

* For purposes of monitoring the Company's status under section 3(a)(1)(C) of the United States *Investment Company Act of 1940,* as amended from time to time (the "**ICA**"), the aggregate Value of the Company's investment securities must not exceed 40% of the Value of the Company's total assets, exclusive of Government Securities and Cash Items, in each case determined on an unconsolidated basis and in accordance with that ICA. The internal allocation limits set out in this Policy are separate risk-management limits and do not determine whether an asset is an investment security, Government Security or Cash Item under that ICA. "**Value**" has the meaning assigned under that ICA and generally means, with respect to (i) securities for which market quotations are readily available and held at the end of the last fiscal quarter, the market value at the end of that quarter, (ii) other securities and assets held at the end of the last fiscal quarter, fair value as determined in good faith by the Board of Directors as at the end of that quarter, and (iii) assets acquired after the end of the last fiscal quarter, their cost. "**Government Securities**" and "**Cash Items**" have the meanings assigned under that Act. For greater certainty, securities issued or guaranteed by the Government of Canada are not Government Securities for purposes of that Act merely because they are sovereign obligations.

V. Prohibited Investments

If the Company approaches any threshold relevant to its status under the United States *Investment Company Act of 1940*, as amended from time to time (the "**ICA**") or proposes to rely on an exclusion, exemption or temporary safe harbour under that Act, the Chief Financial Officer shall immediately suspend further acquisitions of investment securities and obtain advice from qualified United States securities counsel. Reliance on any temporary safe harbour, including Rule 3a-2, requires prior approval of the Board of Directors and contemporaneous documentation of each applicable condition, the intended duration of reliance and the Company's plan to restore compliance before the applicable period expires.

The Treasury Team shall not invest in any of the following instruments. The Board of Directors may authorize an exception by special resolution only if the proposed investment is lawful under applicable Canadian and United States securities legislation, does not cause or create a material risk that the Company will be required to register as an investment company under the ICA, complies with applicable stock-exchange requirements and the Company's public disclosure obligations, and has been reviewed in advance by qualified legal counsel:

- Publicly traded equities or common stock of other corporations (to prevent market risk and conflicts of interest).
- Venture capital, private equity, or crypto-assets.
- Commodities, options, futures, or speculative derivative instruments (except for approved foreign exchange/interest rate hedges).

- High-yield ("junk") bonds or asset-backed securities (ABS/MBS) falling below investment grade.

VI. Diversification & Concentration Limits

To mitigate counterparty default risk, the portfolio must be diversified:

- **US Government securities**: No less than **60%** of the Portfolio shall consist of US Treasuries and Certificates of Deposits (US) issued by FDIC insured institution.
- **Single Issuer Limit:** No more than **15%** of the total portfolio may be invested in the commercial paper or corporate notes of any single corporate issuer.
- **Sovereign Exception:** Except as noted herein, there is no limitation on allocations made directly to Canada or United States Treasury securities.

VII. Internal Controls, Reporting & Compliance

- **Segregation of Duties:** The individual responsible for executing an investment transaction cannot be the same individual who reconciles the bank statements or authorizes wire transfers.
- **Reporting:** The Treasury Team will distribute a **Monthly Investment Summary** to the Chief Financial Officer and a **Quarterly Compliance Report** to the Chief Financial Officer, the Chairman of the Audit Committee and the Board of Directors. Each report must detail total return, portfolio duration, asset breakdown, credit exposure, compliance with each allocation and concentration limit, the issuer and legal classification of each investment, the Company's analysis under applicable Canadian and United States securities legislation, any actual or potential disclosure obligation, any related-party or conflict-of-interest issue, and any breach, exception or remedial action. Supporting calculations and classifications must be retained with the Company's books and records.
- **Policy Exceptions:** Any actual or potential breach of this Policy or applicable Canadian or United States securities legislation must be reported immediately to the Chief Financial Officer, the Chairman of the Audit Committee and legal counsel. No position may be liquidated, acquired or otherwise altered as a corrective measure until the Chief Financial Officer has considered market, disclosure, insider-trading, contractual, accounting and tax consequences with appropriate advisers. The breach must be corrected as promptly as practicable through a documented remediation plan approved by the Chief Financial Officer; any breach that could be material to the Company must also be reported promptly to the Board of Directors and assessed for required public disclosure.
- **ICA Compliance.** Notwithstanding any other provision of this Policy, the Treasury Team shall manage the Treasury Assets and the Portfolio so that the Company does not become an investment company required to register under the ICA. Before acquiring any investment, and at least monthly thereafter, the Chief Financial Officer shall cause the Company to assess its status under the ICA. Any calculations thereunder shall be performed on an unconsolidated basis and shall use the classifications and valuation requirements prescribed by applicable United States securities legislation. No investment may be acquired or retained solely because it is permitted by the allocation limits in this Policy if the acquisition or retention could cause the Company to be an investment company.

- **Securities Law and Exchange Compliance.** All activities under this Policy shall comply with applicable Canadian and United States securities legislation, the rules and policies of each stock exchange on which securities of the Company are listed, and the Company's disclosure, insider trading and related-party transaction policies. Before implementing or materially changing an investment strategy, entering into a material investment transaction or incurring a material loss, the Chief Financial Officer shall consult with legal counsel to determine whether a news release, material change report, current report, financial statement disclosure, management's discussion and analysis disclosure, stock-exchange notice or approval, or other public filing is required. No person may trade or direct trading in circumstances that would contravene applicable prohibitions concerning material non-public information, tipping, manipulation, fraud or misleading disclosure.
- **Registered Advisors**. Any investment dealer, adviser, portfolio manager, custodian or other intermediary engaged in connection with the Portfolio must be appropriately registered, licensed or exempt from registration in each applicable jurisdiction and must be independent of the Company and its directors and officers unless the relationship and transaction have been reviewed and approved in accordance with applicable related-party transaction requirements. No discretionary investment authority may be delegated unless the delegation is documented in a written agreement approved by the Chief Financial Officer and reviewed by legal counsel.

This Policy is effective as of the date of its adoption by the Board of Directors.

Adopted by the Board of Directors of BetterLife Pharma Inc. on October 16, 2026.