March 22, 2019

H.E. António Guterres
Secretary-General
United Nations
New York, NY 10017

Dear Mr. Secretary-General,

I am pleased to confirm Vitality Biopharma, Inc. reaffirms its support of the ten principles of the Global Compact on human rights, labor, environment and anti-corruption. With this communication, we express our intent to implement those principles. We are committed to making the Global Compact and its principles part of the strategy, culture and day-to-day operations of our company, and to engaging in collaborative technology projects that also advance the broader development goals of the United Nations, particularly the Millennium Development Goals.

Vitality Biopharma, Inc., which originally joined the UN Global Compact in July 2016 under the name of Stevia First Corp., has developed an efficient biosynthesis platform that was originally used for the production of stevia but is now being applied to the production of novel cannabinoid pharmaceuticals. Our primary operations today are within the biotechnology and healthcare industries, focused on 1) therapeutic drug development of a new class of cannabinoid pharmaceuticals that may be especially useful for treatment of gastrointestinal or digestive disorders such as inflammatory bowel disease and colorectal cancer and 2) the treatment of opiate dependence, including the use of cannabis products to reduce such dependence.

As part of our continued support and ongoing commitment to the Global Compact initiative and its principles, we would like to provide the following Communication on Progress (COP) that describes our company's efforts to implement the ten principles of the Global Compact.

Sincerely,

Robert Brooke
Chief Executive Officer

Human Rights

As a company that leverages recent breakthroughs in healthcare and biotechnology to develop human therapeutics, we have a clear understanding of how our products can influence human health. Our primary goals are to 1) develop new drugs that can improve outcomes in patients diagnosed with serious neurological and inflammatory conditions, such as inflammatory bowel disease (IBD) and 2) treat opiate dependence, including the use of cannabis products to reduce such dependence.

The treatment of opiate dependence is an important and timely application of cannabinoid pharmaceuticals. Cannabinoid pharmaceuticals may provide a safer and less addictive form of pain relief than opiate painkillers. The statistics are startling. In 2015, in America alone, there were 47,055 deaths from drug overdoses, and opioids were involved in 61% of these cases. Since 2013, the rates of drug-overdose fatalaties has exceeded the number of deaths from car

accidents. Our goal is to raise awareness for and to commercialize safer and less addictive cannabinoid pharmaceutical products, which provide an alternative to opioid pain medications.

We believe prevention and treatment of substance abuse and addiction is a global human rights issue. Human rights sometimes lag behind in emerging markets, and the dangers of addictive and harmful products has the same negative impact regardless of economics or geography. As opioid sales decline in developed countries, often due to public health measures and public backlash against addictive products with negative health effects, sales begin to increase in emerging markets as manufacturers opportunistically look for new markets. This trend has occurred in the past with tobacco products, and is now occurring with sugar and sugary beverages, and is predicted to also occur with opiate painkillers. Our goal is to raise awareness for our products and the opportunity they represent globally, and whenever possible to make our products available in economically challenged markets through licensing and co-development arrangements.

Measurement of Outcomes

Our primary outcome measure is the development of products that provide a safer and less addictive form of pain relief compared to opiate painkillers. Our near-term efforts will therefore be based on initiation of clinical trials for our proprietary pharmaceuticals, initiation of clinical research on medical cannabis, as well as broad outreach and communication of these research results to the scientific and medical communities through publication of the results.

Labour

Vitality Biopharma's team is made up of research and development team members as well as medical personnel who provide treatment for opiate depencence. We seek to provide competitive compensation and benefits, including payment of healthcare benefits for every full-time employee and their family members. Our management team is dedicated to addressing the needs of each employee, both professionally and personally, and we strive to encourage ongoing professional development that will enable each individual's success at Vitality and beyond.

We acknowledge the freedom of association and the effective recognition of the right to collective bargaining, and stand behind the principals of eliminating all forms of compulsory labor, the effective abolition of child labor, and the elimination of discrimination in respect of employment and occupation. We also seek to eliminate discrimination in all forms, including primarily sex, race, religion, disability status, age, and sexual orientation.

Measurement of Outcomes

We have fourteen employees currently, including two scientific researchers at the Ph.D.-level, four researchers at the M.S.-level an M.D. and 4 clinical psychologists. Beyond this, we also interact frequently with outside advisors and consultants as well as regulatory agencies such as the U.S. DEA to help achieve our company's goals. We benefit from a diverse body of employees and advisors, and currently have had no labor disputes or work-related injuries, and no reports of any other significant negative labor-related issues related to the ten principles.

Environment

Please use the box below to describe actions your company has taken in the area of environment. Examples include:

As a drug development company leveraging recent breakthroughs in biotechnology to enable innovative drug manufacturing, the products and processes we use are ones that didn't exist as few as 10-15 years ago, and in many cases are dramatically more sustainable and efficient compared to traditional methods of production. Our focus today is on the production and development of novel cannabinoid pharmaceuticals, although the same biosynthesis process could enable the efficient production of high-potency stevia sweeteners. Such biosynthesis methods could enable a large reduction in usage of raw material inputs compared to traditional agricultural production used in the stevia industry today. Notably, the WHO has labeled sugar as the crop that has contributed to more loss of biodiversity on the planet than any other. We recognize the importance for sustainability and also the economic opportunity in creating technologies that help improve the environment, so we make it a priority to analyze and develop environmentally-friendly technologies.

Measurement of Outcomes

Our primary outcome measure is the development of healthy products and technologies that are more competitive in part because they are more environmentally-friendly. So far, we have made progress on this outcome through the development of bioproduction technologies, which previously have been used for stevia, and now are being applied to the production of cannabosides, a novel class of cannabinoid pharmaceuticals. Cannabosides have no peer group, as they represent a new class of targeted cannabinoid pharmaceuticals, so traditional methods of sustainability analysis are not applicable. Cannabosides can eliminate the intoxicating effects of cannabinoids through targeted delivery to the site of disease. This also means that much lower doses than have been traditionally administered may be effective, reducing the environmental footprint of our manufacturing operations.

In our legacy stevia program, we made notable advances in sustainable biomanufacturing, including the production of steviol compounds from a microorganism that can feed on extremely inexpensive agricultural byproducts or waste, such as sugarcane bagasse. If implemented at an industrial-scale, this production method could reasonably replace hundreds of thousands of acres of sugarcane and stevia leaf production that are currently required to produce purified sweeteners (mostly sugar) for the multinational food and beverage industries.

Anti-Corruption

As a drug development company operating within the healthcare industry, there are many stakeholders involved, including our shareholders, employees, patients, physicians, insurers, researchers, and more. Due to this scope of engagement, often many complex ethical decisions must be made related to real and perceived conflicts-of-interest. For instance, certain physician-researchers would like to commit large amounts of their time to our company's cause, yet if we incentivize them with stock options, it may create a perceived conflict-of-interest that they would not be acting with their patients' interest as their highest priority. Our goal is to not to reduce the presence of conflicts-of-interest, but rather to stress their full disclosure in all appropriate venues, such as in scientific publications, scientific presentations, public speaking

events, and in general whenever communicating with patients and with others in the scientific and medical communities.

The pharmaceutical and biotechnology industries are very profitable and lucrative industries in part due to public support for research and development, and the premise that new and innovative treatments will result from this work. We seek to encourage ongoing public support for our company and the industry as a whole mainly through delivering value within our research and development, and through the creation of pharmaceutical products with medical value that can be clearly communicated to our stakeholders, the medical community, and patients. We are also committed to exploring combination therapies, either alone or in collaboration with other pharmaceutical companies, which may require more complex clinical trials and regulatory development paths, but that we expect will provide substantial benefit for patients participating in such trials and for future patients through improvement of the clinical standard-of-care. For instance, in disease settings viewed as traditionally very challenging, such as progressive multiple sclerosis, our goal is to develop combination products that may have the best chance to enable functional improvement for patients. Beyond commercial success, our goal is recognition as a “cure development” company, and to provide a model for successful drug development that others can emulate and that places a high priority and sense of urgency on meeting the needs of patients with serious and currently intractable disorders.

Measurement of Outcomes

Market approvals for new drugs is the primary measurable outcome along with resulting sales of products that provide clear benefit to patients and healthcare payors. An added benefit and demonstrable outcome for Vitality is to enable us to advance into clinical development and to eventual market approval of our products more quickly than other companies, which may be expedited through added goodwill from company stakeholders. This includes maintaining positive relations and open dialogue with pharmaceutical regulatory agencies and others in the public sector who recognize and appreciate our organizational commitment to not only anti-corruption, but to all of the ten principles of the Global Compact, and to more broadly using our products and technologies to advance the development goals of the United Nations.