

**Report of Organizational Actions
 Affecting Basis of Securities**

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name Vibe Bioscience Ltd. (formerly Altitude Resources Inc.)		2 Issuer's employer identification number (EIN) None	
3 Name of contact for additional information Ryan Mercier	4 Telephone No. of contact 833-420-8423	5 Email address of contact ryanm@vibebioscience.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 2505 - 17th Avenue SW, #214		7 City, town, or post office, state, and ZIP code of contact Calgary, Alberta, Canada T3E 7V3	
8 Date of action March 25, 2019	9 Classification and description Common Shares		
10 CUSIP number 92556L108	11 Serial number(s) N/A	12 Ticker symbol CSE: VIBE	13 Account number(s) N/A

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ **On March 25, 2019, Vibe Bioscience Corporation ("VBC") amalgamated with 2657152 Ontario Inc. to form Vibe Bioscience Inc., a wholly-owned subsidiary of Vibe Bioscience Ltd. ("VBL") (the "Arrangement"). VBC shareholders received approximately 6.883 VBL common shares for every one VBC class A common share exchanged pursuant to the Arrangement.**

Immediately after the Arrangement, Altitude Resources Inc. changed its name to "Vibe Bioscience Ltd."

The Arrangement is described in full in the Listing Statement of Vibe Bioscience Ltd. dated as of March 25, 2019 (the "Listing Statement"), which is available at www.sedar.com.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ **VBL intends that the Arrangement qualify as a tax-deferred reorganization within the meaning of Code Section 368(a). As a result, if the Arrangement qualifies as a tax-deferred reorganization within the meaning of Code Section 368(a), each VBC shareholder would generally have a tax basis in the VBL common shares he, she or it received pursuant to the Arrangement equal to such shareholder's aggregate tax basis in the VBC class A common shares surrendered in exchange therefor.**

Certain VBC shareholders that fail to file a timely gain recognition agreement with the IRS may recognize a gain under Code Section 367.

Even if the Arrangement qualifies as a reorganization under Code Section 368(a), certain special rules would apply if VBC was classified as a passive foreign investment company, as defined under Code Section 1297, for any tax year during which a shareholder held VBC common shares. Former VBC shareholders should review the Listing Statement and consult their own tax advisors regarding the U.S. federal income tax consequences of the Arrangement.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ **For purposes of calculating fair market value, the fair market value of the VBL common shares on April 3, 2019, is estimated at U.S. \$0.64, which was the opening price for VBL shares for its first day of trading on the Canadian Stock Exchange on April 3, 2019 (as converted to U.S. dollars using the daily exchange rate published by the Bank of Canada on April 3, 2019).**

Shareholders should consult with their own tax advisors to determine whether they are required to recognize any gain and what measure of fair market value is appropriate.

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► **VBL intends that its acquisition of VBC pursuant to the Arrangement qualify as a reorganization within the meaning of Section 368(a) of the Code. Consequently, if the Arrangement qualifies as a reorganization within the meaning of Code Section 368(a), the U.S. federal income tax consequences of the Arrangement to VBC shareholders would be determined under the Code Sections 354, 358, 1001 and 1221.**


In addition, if VBC was classified as a passive foreign investment company as defined under Code Section 1297 (a "PFIC"), then Code Sections 1291-1298 would be applicable. Former VBC shareholders should consult their own tax advisors regarding the potential application of the PFIC rules.

18 Can any resulting loss be recognized? ► **If the Arrangement qualifies as a reorganization within the meaning of Code Section 368(a), then in general, each VBC shareholder who received VBL common shares pursuant to the Arrangement should not recognize any loss.**

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► **In general, any gain recognized should be reported by shareholders for the taxable year which includes March 25, 2019 (e.g., a calendar year shareholder would report the transaction on his or her federal income tax return filed for the 2019 calendar year).**

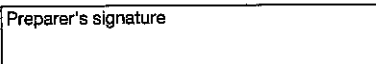
Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ►  Date ► April 16, 2019

Print your name ► **John Ryan Mercier** Title ► **Chief Financial Officer**

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
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