

Anti- Bribery and Corruption Policy

Last Updated: 01 January 2024

Mobile Accord, Inc. (T/A GeoPoll) operates around the world and we pride ourselves on our reputation for acting with integrity and honesty wherever we do business. At GeoPoll, it's not only about delivering business results; it is about delivering them the "right" way. This document outlines the expectations we have for our employees, clients and contractors. We do not make compromises in these areas and we expect all personnel to always adhere to the letter, spirit and intent of these expectations and values.

At GeoPoll, we comply fully with laws and regulations in all countries we do business in. We respect the law, support universal human rights, protect the environment and endeavor to benefit the communities where we work. We expect our clients and contractors to conduct their business in compliance with these requirements as well. Bribery of any government official in any country is strictly against company policy, even if the refusal to make such a payment would result in the loss of a business opportunity. GeoPoll complies with the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act.

What is bribery and corruption?

Bribery involves the giving or receiving of money or anything else of value as an inducement or reward for an improper act. An act will be improper if it involves someone performing (or failing to perform) a function illegally, unethically, in bad faith, not impartially, or in breach of a position of trust.

The recipient of a bribe can be in the Private Sector (i.e. in business) or in the Public Sector (e.g. in government or a state-owned company). Bribery can take place where the offer or payment is made indirectly through a third party, such as an agent. Bribes can take many different forms, such as cash payments, gifts, hospitality (e.g. meals, hotel stays or tickets or invitations to sporting and cultural events), other promotional expenses (e.g. travel and accommodation expenses), political contributions, and/or charitable donations.

Our anti-bribery and corruption commitments

- We are committed to a zero-tolerance approach to bribery and corruption. Bribery and corruption are never acceptable by or on behalf of GeoPoll - we will not tolerate them in our business or by those we do business with.
- We are committed to acting fairly, honestly, openly and in an ethical manner in all our business dealings and relationships wherever we operate.
- We are committed to upholding applicable national and international laws and regulations relevant to countering bribery and corruption wherever we operate.
- We are committed to implementing and enforcing effective systems within GeoPoll to counter the risk of bribery and corruption.

General restrictions

This Policy contains certain general restrictions which help guard against the risk of bribery and corruption. **You must not**, whether directly or indirectly through a third party:

- **provide** money or anything else of value to any person: (1) with the intention of obtaining, retaining or rewarding any improper commercial or other advantage, or (2) to induce any person to act improperly

or to reward them for doing so, or (3) knowing or believing that acceptance by the other person would itself be improper; or

- **receive** money or anything else of value where you know or suspect that: (1) it is offered or provided either with the intention of inducing any person to provide any improper commercial or other advantage or to act improperly, or as a reward for doing so, or (2) the request itself is improper.

Money or anything else of value includes any gift, hospitality, charitable donation, political contribution, or other promotional expense or any other financial or other advantage. References to “providing” include offering, promising, and authorizing. References to “receiving” include requesting, soliciting, agreeing to receive, and accepting. Conflicts of interest will be addressed and documented in an open and transparent manner. At no time will any contract be given to any government official.

It is GeoPoll’s standard policy not to make facilitation payments. Prior to paying any consulting or processing fees, due diligence will be conducted. Payments must be approved by the CEO, CFO, and/or the General Counsel, and documented in an open and transparent manner.

In the event that any GeoPoll personnel believes themselves to be threatened or in danger for refusing to bribe an official, the health and safety of that person shall be considered paramount. Any action taken will be promptly reported to the immediate GeoPoll line manager in writing, and the GeoPoll CEO and General Counsel.

All transactions, including payment of professional fees and suppliers, will be fully documented. In the event of any irregularity, a standard investigation process will be followed.

How to raise concern

If you have any questions about the Policy or are unsure about the application of any aspect of it, please seek guidance from your line manager. If you become aware of any actual or suspected breach of this Policy, you must raise your concerns as soon as possible to nick@mobileaccord.com or tnusratty@mobileaccord.com.

Nicholas Becker – CEO
Mobile Accord, Inc. (T/A GeoPoll)

RELATED POLICIES & PROCEDURES (all policies are reviewed every two (2) years):

- Anti-Money Laundering Policy
- Anti-Bribery & Corruption Policy
- Code of Ethics and Conflict of Interest Policy
- Data Classification & Protection Policy
- GeoPoll Privacy Policy