



Due Diligence + KYC Policy - Independent Contractors + Subcontractors

Last Updated: 01 January 2024

Objective: Establish a consistent Due Diligence and Know Your Customer Policy (“DD + KYC Policy” or “Policy”) within Mobile Accord, Inc. (T/A GeoPoll) and GeoPoll’s affiliates and subsidiaries.

Scope: This Policy applies to all departments and all persons working for GeoPoll.

Authority: The Chief Executive Officer, the Chief Legal Officer, and/or their nominee(s) are responsible for the development, administration, and evolution of this Policy (“Authority”). Each person / department at GeoPoll is responsible for compliance.

Statement: As a multinational company with operations spanning multiple countries and jurisdictions worldwide, GeoPoll maintains this Policy (and other similar policies) to guide its operations and processes with respect to the engagement of independent contractors and subcontractors in its many operating countries (as listed below).

The purpose of this Policy is to ensure that GeoPoll remains at all times a bona fide entity in compliance with all local laws and regulations, as well as to protect the interests of the independent contractors and subcontractors we engage with to carry out work on our behalf.

Policy & Procedure for Engaging Independent Contractors and Subcontractors:

Whenever GeoPoll decides to engage an Independent Contractor and/or Subcontractor, GeoPoll must carry out the following steps to ensure full compliance with local labor and tax laws and also to minimize any potential legal exposure for GeoPoll:

1. Non Disclosure Agreement (NDA): Once identified for engagement by MAI, the candidate must sign a standard mutual NDA with MAI to protect MAI’s information and the candidates information. – *This may (and should) be accomplished through DocuSign or another document signing software.*
2. In addition, the following information must be collected from the candidate and shared with the relevant administrative staff for policy and procedure implementation. For the avoidance of doubt GeoPoll Executive Team members, namely the Chief Operating Officer, the Chief Legal Officer, the Director of Finance, and the Senior Director of People & Culture (or Head of HR) may query this information for their records and further action as needed:
 - a. Full name;
 - b. Contact information and address;
 - c. Scanned copy or photo of a valid national identification card and/or passport (front and back);
 - d. Applicable to Nigeria Only: Valid Tax Identification Number (TIN) as provided by the Federal Inland Revenue Service (FIRS) of Nigeria – To be provided to Finance for tax withholding purposes when payments to the candidates are effectuated.**
 - e. Full bank account credentials for the effectuation of future payments; and (if available)
 - f. Mobile money payment coordinates in the event that remuneration method is available.
3. Once this information is provided by the candidate to GeoPoll, GeoPoll must conduct a Specially Designated Nationals And Blocked Persons List (SDN) search through the Office of Foreign Controlled Assets (OFAC) portal to check if the candidate is subject to any specific sanctions from or is blocked by the US Department of Treasury, which would prohibit GeoPoll from engaging in any capacity with that person. The SDN list can be queried here:



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- a. <https://sanctionssearch.ofac.treas.gov/>
 - b. <https://home.treasury.gov/policy-issues/financial-sanctions/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>
4. If the candidate is not subject to any such OFAC sanctions / blocks, they must then enter into an Independent Contractor Agreement (ICA). As part of the ICA the candidate will also need to sign MAI's Anti-Bribery & Corruption Policy and Code of Ethics and Conflict of Interest Policy, which form central parts of the foundation of MAI's greater compliance policies – *These may (and should) be accomplished through DocuSign or another document signing software.*
 5. Once the ICA and those other documents are fully executed and the candidate has been engaged, onboarded, and commenced work on behalf of GeoPoll, they will need to provide regular monthly invoices to MAI's Finance department to ensure they are remunerated in accordance with the Finance Department's monthly AP / payroll processes, either to the candidate's nominated bank account or mobile money account. **Applicable to Nigeria Only: This will also entail withholding the required taxes to be paid to the FIRS in Nigeria on behalf of the candidate.**

Disclosure. All apparent breaches of this Policy and/or noncompliant acts must be disclosed to the Chief Executive Officer, the Chief Legal Officer, and/or their nominee(s) for review and determination of whether a violation of this Policy exists.

Complaints or Inquiries. All complaints or inquiries concerning possible violations of this Policy should immediately be reported to the Chief Executive Officer, the Chief Legal Officer, and/or their nominee(s) for review and a determination as to whether a violation of this Policy exists.

7. Violations. In addition to any compensatory and/or punitive damages contained in any provision of law that may be relevant to this Policy, any determination by the Authority that a breach or a noncompliant act has occurred or may occur may result in immediate termination of a candidate's engagement with GeoPoll.

8. Integration: The terms contained in this Policy is indoctrinated as a GeoPoll policy and shall be integrated into GeoPoll overall compliance policies, which govern the arrangement between GeoPoll, its employees, independent contractors, and subcontractors..

9. Understanding. Each employee, independent contractor, and subcontractor shall read through this Policy and confirm his/her understanding and acceptance of the same, as well as the principles, terms and conditions contained within this Policy. All employees, independent contractors, and subcontractors are charged with having read and understood this Policy

This Policy is officially accepted and implemented by GeoPoll.