



WORKPLACE HARASSMENT POLICY

Last Updated: 01 January 2024

Objective: Establish a consistent Workplace Harassment Policy ("Code and Policy") within Mobile Accord, Inc. (T/A GeoPoll)

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

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

Statement: GeoPoll maintains certain policies to guide its employees with respect to standards of conduct expected in areas where improper activities could damage GeoPoll's reputation and otherwise result in serious adverse consequences to GeoPoll and its employees. The purpose of this Code and Policy is to affirm required standards of conduct and practices with respect to certain type of behavior, payments, and political contributions.

Policy Against Workplace Harassment

GeoPoll has a strict policy against all types of workplace harassment, including sexual harassment and other forms of workplace harassment based upon an individual's age (40 or older), sex (including gender identity), pregnancy (including childbirth, lactation, and related conditions), sexual orientation (including transgender status), race (including hair texture, hair type, or a protective hairstyle commonly or historically associated with race, such as braids, locs, twists, tight coils or curls, cornrows, Bantu knots, Afros, and headwraps), national origin, disability, creed, religion, genetic information, ancestry, military or veteran status, or any other status protected by federal, state, or local laws. All forms of harassment of, or by, employees, vendors, visitors, customers, and clients are strictly prohibited and will not be tolerated.

Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment; (2) submission to, or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

While it is not possible to identify every act that constitutes or may constitute sexual harassment, the following are some examples of sexual harassment:

- Unwelcome requests for sexual favors;
- Lewd or derogatory comments or jokes;
- Comments regarding sexual behavior or the body of another;
- Sexual innuendo and other vocal activity such as catcalls or whistles;
- Obscene letters, notes, emails, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual nature;
- Repeated requests for dates after being informed that interest is unwelcome;



- Retaliating against another for refusing a sexual advance or reporting an incident of possible sexual harassment to the Company or any government agency;
- Offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors; and
- Any unwanted physical touching or assaults, or blocking or impeding movements.

Other Harassment

Other workplace harassment is verbal or physical conduct that insults or shows hostility or aversion towards an individual because of the individual's age (40 or older), (including gender identity), pregnancy (including childbirth, lactation, and related conditions), sexual orientation (including transgender status), race (including hair texture, hair type, or a protective hairstyle commonly or historically associated with race, such as braids, locs, twists, tight coils or curls, cornrows, Bantu knots, Afros, and headwraps), national origin, disability, creed, religion, genetic information, ancestry, military or veteran status, or any other status protected by federal, state, or local laws.

Again, while it is not possible to list all the circumstances that may constitute other forms of workplace harassment, the following are some examples of conduct that may constitute workplace harassment:

- The use of disparaging or abusive words or phrases, slurs, negative stereotyping, or threatening, intimidating, or hostile acts that relate to the above protected categories;
- Written or graphic material that insults, stereotypes, or shows aversion or hostility toward an individual or group because of one of the above protected categories and that is placed on walls, bulletin boards, email, voicemail, or elsewhere on our premises, or circulated in the workplace; and
- A display of symbols, slogans, or items that are associated with hate or intolerance toward any select group.

5. Disclosure. All apparent breaches of this Code and Policy and/or noncompliant acts must be disclosed to the Chief Executive Officer, the General Counsel, and/or their nominee for review and determination of whether a violation of this Code and Policy exists.

6. Complaints or Inquiries. All complaints or inquiries concerning possible violations of this Code and Policy should immediately be reported to the Chief Executive Officer, the General Counsel, and/or their nominee for review and a determination as to whether a violation of this Code and 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 Code and Policy, any determination by the Authority that a breach or a noncompliant act has occurred or may occur may result in immediate termination of an employee's employment with GeoPoll, an order that the employee divest and/or remove himself/herself from the activity causing the conflict and provide GeoPoll with evidence of such divestment and/or removal, or an order that the employee ceases and desists from engaging in the noncompliant act and evidence of the same. In the event of termination for violation of any provision of this Code and Policy, the employee shall expressly acknowledge that he/she shall not be liable to receive from GeoPoll any form of severance or termination payment.

8. Integration: The terms contained in this Code and Policy is indoctrinated into GeoPoll policy and shall be integrated into all employees' terms of employment which govern the arrangement between GeoPoll and the employees.



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

This Code and Policy is officially accepted and implemented by GeoPoll.

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

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

- Data Classification & Protection Policy
- GeoPoll Privacy Policy