Corporate and Social Responsibility Policy

Mobile Accord, Inc. (T/A GeoPoll)

1. Purpose and scope

GeoPoll conducts primary research in emerging markets, largely by interviewing members of the public in their own communities and in their own languages. The conduct of that work carries direct social responsibility, both towards the people GeoPoll employs and contracts, and towards the people it interviews.

This policy states GeoPoll's corporate and social responsibility commitments and identifies the specific policies through which each commitment is implemented. It applies to Mobile Accord, Inc., its wholly owned subsidiaries in the Democratic Republic of the Congo, Kenya, Mauritius, Nigeria, South Africa and Tanzania, and to all personnel, consultants, contractors and subcontractors performing work on GeoPoll's behalf.

2. Governing framework

GeoPoll conducts its business in accordance with the laws of the countries in which it and its subsidiaries operate, in line with international best practice. As an agent of telecommunications and financial technology partners, GeoPoll is additionally governed by their operating agreements and licences and complies with their Know Your Customer, anti-money laundering and anti-bribery and corruption requirements.

GeoPoll supports the labour standards of the International Labour Organisation and the principles of the Universal Declaration of Human Rights, and where a conflict arises between national law and a higher standard, GeoPoll applies the higher standard.

The policies below are published on GeoPoll's website, are communicated to personnel during induction training, and are reviewed every two years. Each line manager is responsible for adherence within their team, and each individual is responsible for familiarity and compliance.

3. Responsibility to workers

3.1 Child labour and forced labour

GeoPoll does not use and does not tolerate child labour, forced, bonded, involuntary or trafficked labour in its own operations or in its supply chain. Workers are free to leave employment on reasonable notice. This is implemented through the Anti-Human Trafficking Compliance Policy and through pre-engagement due diligence on contractors and subcontractors.

3.2 Health, safety and hygiene

GeoPoll maintains controlled access to its offices and CCTV surveillance in common areas. Employees are covered by Workers Injury Benefits Act coverage and comprehensive medical insurance. Field personnel receive safety briefings before deployment, and interviewer safety is treated as a condition of fieldwork rather than a consideration secondary to data collection.

3.3 Discipline, grievance and harassment

Physical abuse, the threat of abuse, sexual or other harassment, verbal abuse and other forms of intimidation are prohibited. Accessible channels for complaints and whistleblowing are maintained. Disciplinary and grievance procedures are documented and communicated to personnel. This is implemented through the Workplace Harassment Policy and the GeoPoll HR Handbook.

3.4 Freedom of association and employee representation

GeoPoll adheres to the laws of each country of operation regarding trade union representation and the formation of employee representation groups.

3.5 Working hours, remuneration and employment terms

Working hours comply with applicable national law and are not excessive. Wages and benefits meet or exceed national standards, and workers receive clear written information on pay and conditions. Excessive wage deductions are not used as a disciplinary measure. All workers, including interviewers engaged for a single assignment, receive written terms detailing the conditions of their engagement in language they can understand.

3.6 Equality of treatment

GeoPoll seeks to avoid any form of unlawful discrimination in all aspects of employment, including on the grounds of age, caste or tribe, disability, gender or sex, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation and military status, together with any other characteristic protected by local legislation. This is implemented through the Recruitment and Selection Process.

3.7 Right to work

GeoPoll verifies the right to work of the people it engages, and applies the same verification requirement to contractors and subcontractors through its Due Diligence and Know Your Customer Policy.

4. Responsibility to research participants

Participation in GeoPoll research is voluntary and informed. Respondents are told what is being collected, for what purpose and by whom, and are given the opportunity to give or withhold consent before participating. Participation is never made a condition of access to a product, service or benefit.

Personal data is collected, processed and retained in accordance with GeoPoll's published data protection policies and with the General Data Protection Regulation, the Kenya Data Protection Act 2019 and its implementing regulations, the California Consumer Privacy Act, the Tanzania Personal Data Protection Act 2022 and other applicable data protection law. Respondents hold enforceable rights of access, rectification, erasure, restriction, objection, portability, withdrawal of consent and complaint to a supervisory authority.

GeoPoll collects only the data necessary for the stated purpose, retains it no longer than necessary, restricts access to respondent telephone numbers, and prohibits interviewers from downloading or forwarding collected data.

5. Community impact

GeoPoll recruits interviewers, supervisors and field managers locally in the markets where it works, which places employment and income in the communities being researched rather than importing capacity into them. Local field teams are trained and certified, and many are engaged repeatedly across assignments, which builds durable research capability in those markets.

GeoPoll research is frequently used to inform humanitarian, health, education and financial inclusion programming, and GeoPoll publishes research findings in the public interest where the client permits.

6. Business practices

GeoPoll complies with applicable laws and regulations concerning bribery, corruption, fraud, money laundering, tax evasion and unethical business practice, including the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act.

GeoPoll makes no contribution to any political party or candidate for political office except as permitted by law and by its own Code of Ethics. Employees may not enter into arrangements with competitors restricting price, cost, service offering, terms of sale, volume, market share, territory or customer selection. Gifts offered to employees must be reported to the Chief Executive Officer or the General Counsel before acceptance, regardless of value. This is implemented through the Anti-Bribery and Corruption Policy, the Anti-Money Laundering Policy, the Anti-Facilitation of Tax Evasion Policy and the Code of Ethics and Conflict of Interest Policy.

7. Environment

GeoPoll's environmental impact arises principally from three sources: travel associated with field research, energy consumed by the systems that host and process data, and consumables used in data collection. GeoPoll takes the following measures to reduce that impact:

- Interviewers and field supervisors are recruited in-country, which removes the international air travel that would otherwise be required to staff each assignment
- Data collection is electronic. Questionnaires are administered on devices or by telephone, which eliminates printed questionnaires, printed showcards and the physical transport and storage of paper returns
- Where in-person interviewing is required, field visits are grouped geographically so that a given area is covered in a single deployment rather than repeated journeys
- Remote and telephone-based methods are offered as an alternative to face-to-face collection where they meet the research objective, which removes field travel entirely
- Personnel work across distributed and remote locations, which reduces commuting and the office footprint per employee
- Datasets, transcripts, documentation and reports are delivered electronically
- Systems are hosted on shared infrastructure rather than dedicated on-premise hardware, and hardware is used to end of life before replacement

GeoPoll expects the environmental performance of its suppliers and field partners to be consistent with these measures, and takes environmental considerations into account when selecting them.

8. Professional standards and research ethics

GeoPoll applies recognised research ethics standards to the design and conduct of its studies, including voluntary informed consent, confidentiality, data minimisation, safeguarding of vulnerable respondents and protection of interviewer safety. GeoPoll has participated in institutional review board processes at universities and research institutions where a study required it, and submits studies for ethical review where the client, the design or the jurisdiction requires.

9. Supply chain

GeoPoll requires its contractors, subcontractors and field partners to meet the standards set out in this policy. Contractors and subcontractors are assessed before engagement under the Due Diligence and Know Your Customer Policy. Where a client imposes a supplier code of conduct on GeoPoll, GeoPoll notifies its sub-suppliers of their responsibility to implement that code, and passes on the corresponding contractual obligations.

GeoPoll will cease to trade with a supplier that shows persistent disregard for the social, ethical or environmental standards in this policy.

10. Governance, reporting and review

The Chief Executive Officer and the General Counsel, or their nominee, are responsible for the adoption, administration and review of this policy. Suspected breaches must be reported to the Chief Executive Officer or the General Counsel for review and determination, and failure to report a known breach is itself a breach. Determinations may result in disciplinary action up to and including termination.

This policy is reviewed every two years in line with GeoPoll's standard policy review cycle.

11. Related policies

- GeoPoll Code of Business Conduct
- Code of Ethics and Conflict of Interest Policy
- Anti-Bribery and Corruption Policy
- Anti-Money Laundering Statement
- Anti-Facilitation of Tax Evasion Policy
- Anti-Human Trafficking Compliance Policy
- Workplace Harassment Policy
- Recruitment and Selection Process
- Commitment to Employee Safety and Security Statement
- Due Diligence and KYC Policy for Independent Contractors and Subcontractors
- Privacy Policy
- Data Subject Rights, Security Controls, and Data Collection
- Data Subject Rights Procedure
- Business Continuity and Disaster Management Plan

Approved and adopted on behalf of Mobile Accord, Inc. (T/A GeoPoll)

Signature: 

Name: Timur Nusratty
Title: Chief Legal Officer
Mobile Accord, Inc. (T/A GeoPoll)

Date: 06 October 2026