



GeoPoll Code of Business Conduct

Last Updated: 01 January 2024

Mobile Accord, Inc. (T/A GeoPoll) is a registered business entity in the United States with wholly-owned subsidiaries in the DRC, Kenya, Mauritius, Nigeria, South Africa, and Tanzania. GeoPoll shall at all times conduct its business in accordance with the laws of the countries in which the GeoPoll and its subsidiaries operate, in line with international best practices. Additionally, as agents of our telecommunications and financial technology partners, we are governed by their operating agreements, their telecommunication licenses, and their financial services license, and we comply with their Know-Your-Customer (KYC), their Anti-Money Laundering, and their Anti-Bribery and Corruption regulations. As agents, we offer assistance to our customers to verify and audit transactions at the telecom and financial services levels on their behalf.

We are committed to the mission and ethics of promoting good people doing good things in sustainable, ethical, and innovative ways. Our activities are guided by the following corporate policies and procedures:

- Anti-Money Laundering Policy
- Anti-Bribery & Corruption Policy
- Code of Ethics and Conflict of Interest Policy
- Data Classification & Protection Policy
- GeoPoll Privacy Policy
- Security Protocol & Procedure
- The GeoPoll HR Handbook

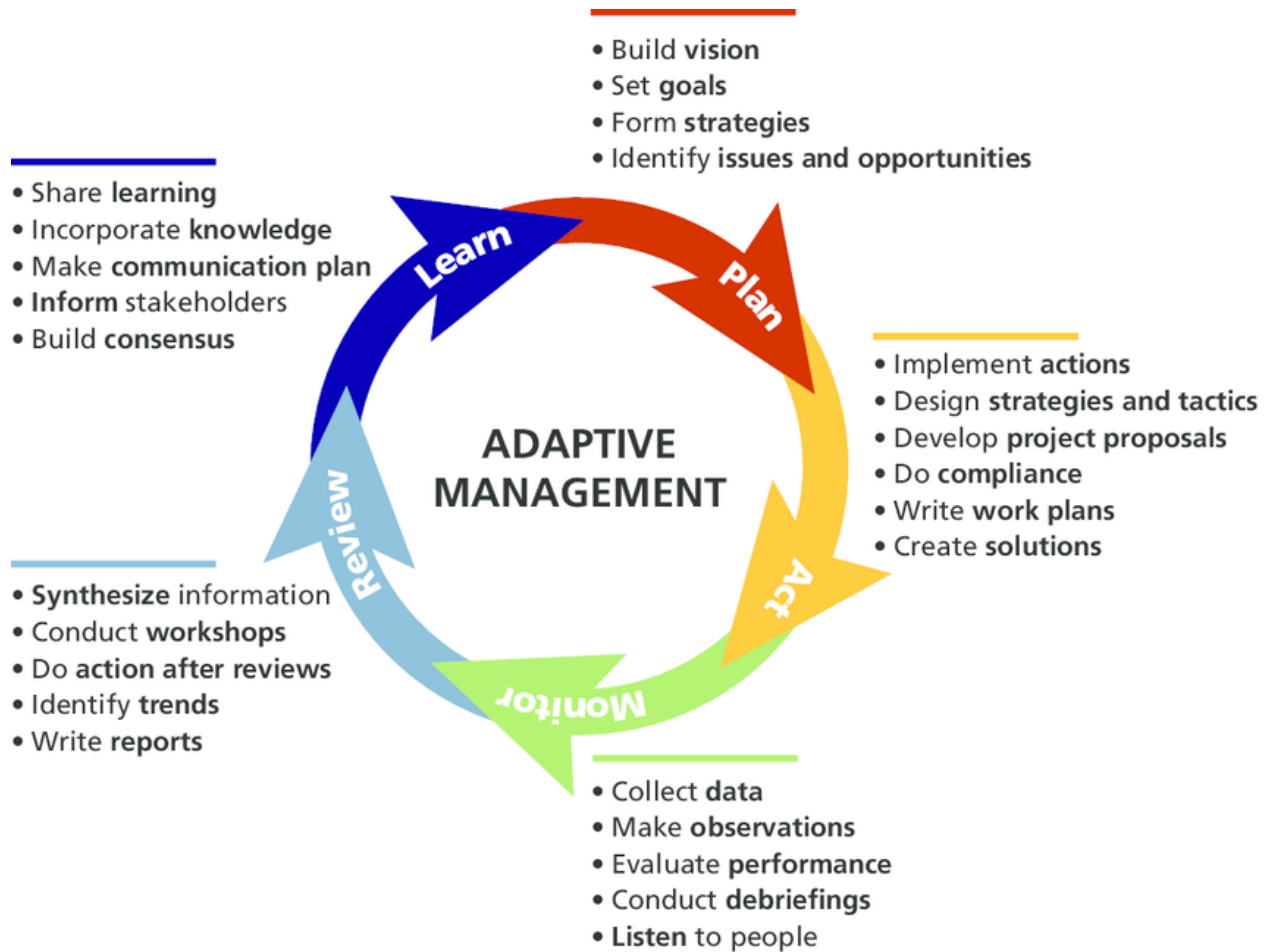
GeoPoll makes the above policies, as well as related procedures and guidance notes, publicly available on its website and they are communicated to personnel during induction training. It is the responsibility of each line manager to adhere to these policies, and to ensure that each of their reports is made aware of and adheres to the same. It is the responsibility of each person to become familiar with and adhere to these policies, as well as to direct questions or report violations to the appropriate manager. All policies are reviewed every two years and updated accordingly.

Internal Management and Reporting

GeoPoll has an open-door approach to communication; anyone can talk to anybody at any time. A company-wide meeting is held monthly and all personnel participate. In addition weekly senior management calls occur. At GeoPoll we strive at all times to standardize and streamline the flow of information within the organization.

Adaptive Management

We take a proactive, adaptive management approach to ensure our teams, products and services are always improving; our tech stack is resilient; our response times are minimal; and our safeguards are effective. Our Customer Support and Client Services teams are continuously receiving and incorporating customer feedback into our platform through our standard reporting framework. We perform regular internal and external testing of our systems. Feedback from the same is fed back into technical and management teams for further action.



Service Levels

Our goal is real-time data transaction processing, and we achieve this over 90% of the time. A delayed transaction is typically processed in under 1 hour. In exceptions circumstances (e.g., downtime in the telecommunication networks), GeoPoll strives to deliver messages within 24 hours or provide alternative means of engaging with respondents, either through alternative networks, or other airtime and/or mobile money service providers.

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

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

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- Data Classification & Protection Policy
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