

## BUSINESS CODE OF CONDUCT

### Core Values

Our mission is revolutionizing customer service by providing businesses with actionable insights, fostering integrity, and ensuring fair and unbiased evaluations. We aim to empower businesses to be the best they can be and help them achieve their goals.

### Our Vision

We envision being the trendsetters of change and leaders in a world where businesses embrace ethical practices, customers relish exceptional service, and auditors contribute to an ecosystem of trust and excellence.

### CODE OF CONDUCT:

A : Business Relations

B : Mystery Auditors

## 1. Introduction

**1.1 Policy Statement** Incognito Corporate Service Providers ("Incognito") is committed to ensuring the highest standard of ethical behaviour towards its employees, mystery auditors, clients, and the communities we operate in. We conduct our mystery shopping services business in accordance with this Code of Conduct and expect our employees, contractors, and mystery auditors to operate in compliance with its standards and all applicable laws and regulations.

**1.2 Scope** This Code applies to all areas of Incognito's global mystery shopping services business and covers all individuals performing services for or on behalf of Incognito, including employees, contractors, mystery auditors, suppliers, and other third parties.

**1.3 Compliance** Compliance with this Code is mandatory for all covered individuals and entities. Where any provisions cannot be met immediately, a robust remediation plan must be implemented within an agreed timeframe. Failure to comply may result in disciplinary action up to and including termination of employment, contracts, or business relationships.

-Page 1 of 6-  
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## 2. Ethical Principles

2.1 **Integrity and Honesty** We conduct our business with integrity, honesty, and transparency in all dealings. We do not engage in any form of deception, misrepresentation, fabrication, or unethical behaviour in our mystery shopping evaluations and reporting.

2.2 **Confidentiality** We safeguard the confidentiality of all sensitive information about our clients, their businesses, employees, contractors, mystery auditors, and Incognito's operations. Confidential data must be secured against unauthorized access or disclosure.

2.3 **Objectivity and Conflicts of Interest** We maintain objectivity and avoid actual or perceived conflicts of interest that may compromise fair evaluations. Mystery auditors must not accept gifts, incentives, or special treatment from businesses they evaluate. Any potential conflicts must be promptly disclosed.

2.4 **Privacy and Data Protection** We respect individual privacy rights and comply with data protection laws in the collection, processing, transfer, and storage of personal data related to our services.

2.5 **Social Media and Online Conduct** We recognize the importance of maintaining professionalism and protecting confidential information in the digital realm. All employees, contractors, and mystery shoppers must exercise caution and good judgment when engaging on social media platforms or other online forums. The following guidelines apply:

- Refrain from discussing or disclosing any confidential information about our clients, their businesses, employees, contractors, mystery shoppers, or Incognito's operations on social media or other public platforms.
- Avoid posting or sharing any content that could be perceived as defamatory, discriminatory, or offensive, or that could negatively impact the reputation of our organization or our clients.
- Do not misrepresent your affiliation with Incognito or make unauthorized statements on behalf of the company.
- Be mindful of your online presence and conduct, as it reflects on our organization's values and professionalism.

## 3. Professional Conduct

**3.1 Respect and Non-Discrimination** We treat all individuals with dignity, respect, and courtesy. We promote diversity, inclusion, and equal opportunity, and do not tolerate any form of discrimination, harassment, bullying, or abuse.

**3.2 Quality and Continuous Improvement** We are committed to delivering high-quality mystery shopping services adhering to best practices. We foster continuous improvement through training, feedback, and implementing measures to enhance performance.

**3.3 Health, Safety, and Environment** We provide a healthy and safe working environment for our employees and mystery auditors, complying with applicable laws and regulations. We also recognize our responsibility to minimize adverse environmental impacts through sustainable practices.

## 4. Business Integrity

**4.1 Legal Compliance** We comply with all applicable local, national, and international laws and regulations governing our business operations, including those related to economic sanctions, trade controls, anti-corruption, and anti-money laundering.

**4.2 Anti-Corruption and Anti-Bribery** We have a zero-tolerance approach towards bribery, corruption, fraud, or any form of unethical conduct. Our employees, contractors, and mystery auditors must not offer, give, solicit, or accept bribes, kickbacks, or improper payments of any kind.

**4.3 Fair Competition** We compete fairly and ethically, without engaging in any anti-competitive practices such as price-fixing, bid-rigging, or sharing competitively sensitive information with competitors.

**4.4 Intellectual Property** We respect and protect all forms of intellectual property rights, including copyrights, trademarks, and trade secrets, both our own and those of others. We obtain necessary permissions before using any proprietary materials.

## 5. Implementation and Reporting

**5.1 Training and Communication** We provide comprehensive training and resources to ensure all covered individuals understand and can effectively implement this Code of Conduct.

**5.2 Monitoring and Auditing** We regularly monitor compliance with this Code through audits, assessments, and investigations as needed. Mystery auditors may be subject to quality assurance evaluations.

**5.3 Reporting Violations** All covered individuals are expected to report any suspected violations of this Code promptly through designated channels. Incognito prohibits retaliation against anyone who reports a concern in good faith.

**5.4 Accountability and Disciplinary** Action Violations of this Code may result in disciplinary action proportionate to the offense, up to and including termination of employment, contracts, or business relationships.

**6. Continuous Improvement** This Code will be periodically reviewed and updated to ensure its continued relevance and alignment with evolving legal requirements, industry best practices, and organizational needs.

## B: Mystery Auditors

### 1. Confidentiality and Integrity

1.1 Mystery auditors must maintain strict confidentiality regarding all client information, data, materials, and intellectual property. Disclosure of any confidential details is strictly prohibited.

1.2 All mystery shop findings must be reported honestly and factually, without any fabrication, exaggeration, or misrepresentation. This principle is in line with the Integrity and Honesty guidelines outlined in section 2.1 of this Code (Business Relations)

1.3 Any violation of confidentiality or integrity principles will result in disciplinary action up to and including termination.

### 2. Objectivity and Conflicts of Interest

2.1 Mystery auditors must remain objective and impartial, avoiding any actual or perceived conflicts of interest.

-Page 4 of 6-  
CONFIDENTIAL

- 2.2 Shoppers are prohibited from evaluating any businesses where they have personal, financial or other ties that could influence their judgement.
- 2.3 Accepting any gifts, incentives, special treatment, or consideration from clients or evaluated businesses is strictly forbidden, as it compromises objectivity.
- 2.4 All potential conflicts of interest must be promptly disclosed before accepting mystery shop assignments. Undisclosed conflicts will be grounds for termination.

### 3. Fair Compensation

- 3.1 Mystery auditors will be compensated fairly in accordance with industry standards, experience levels and complexity of assignments.
- 3.2 Payment terms, rates and invoicing procedures will be clearly defined and transparently communicated.
- 3.3 No undisclosed costs or fees will be imposed on shoppers for training, certifications or other requirements.

### 4. Client-centric Approach

- 4.1 Our mystery auditors provide comprehensive, objective feedback to help clients continuously improve their products, services and operations.
- 4.2 All evaluations adhere to mutually agreed scopes, methodologies, reporting templates and criteria defined with each client.
- 4.3 We maintain responsiveness to client inquiries and feedback to build strong, collaborative relationships.

### 5. Professionalism and Representation

- 5.1 Mystery auditors must conduct themselves professionally and treat all individuals with courtesy, dignity and respect.
- 5.2 Any form of discrimination, harassment, bullying or other inappropriate conduct is strictly prohibited and grounds for termination.
- 5.3 When performing mystery shops, shoppers must follow all client policies, guidelines and reasonable instructions.

## 6. Expertise and Continuous Improvement

- 6.1 All mystery auditors undergo comprehensive training on guidelines, procedures, reporting standards and client-specific requirements.
- 6.2 Training programs are regularly updated to reflect new techniques, best practices, regulations, and client needs.
- 6.3 We foster sustained learning and professional development to continuously elevate our service quality.

## 7. Transparency and Accountability

- 7.1 Clear reporting procedures with audit trails to verify authenticity and integrity of findings.
- 7.2 Option to provide supporting evidence (photos, videos, etc.) in accordance with client preferences, GDPR compliance and the local laws and regulations.
- 7.3 We maintain accountability processes including quality assurance audits and recourse for disputing evaluations.



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-Page 6 of 6-  
CONFIDENTIAL