

Corporate Social Responsibility & Governance Framework for GMA Consultancy

1. Framework Overview and Strategic Purpose

1.1 Mission Statement

GMA Consultancy exists to foster a culture of integrity and transparency, leveraging its professional expertise to combat financial crime while simultaneously delivering measurable social impact through community initiatives. This framework formalizes our commitment to operating responsibly and ethically, ensuring that every social contribution strengthens the global effort to support financial integrity and responsible governance.

1.2 Scope and Application

This document serves as the primary governance instrument for aligning GMA's Corporate Social Responsibility (CSR) with its broader ESG strategy. This framework governs all CSR initiatives, strategic partnerships, and internal governance protocols established under the Community Initiative. Its mandates apply to all community support programs, educational content, NGO collaborations, and CSR elements embedded within GMA's service products.

1.3 Vision

VISION: To contribute to a culture of integrity, transparency, and sustainable governance.

2. Core Guiding Principles and Commitments

GMA Consultancy mandates a culture of accountability. The firm is steadfast in the following commitments:

- Promoting global awareness of financial crime risks.
- Cultivating a robust organizational culture of governance and compliance.

- Enforcing transparency and integrity across all business dealings.
- Actively executing social initiatives that deliver tangible community benefits.

Guiding Principles

The following five principles dictate the execution of all firm activities:

- a) **Integrity and Transparency:** All CSR initiatives must be executed with absolute transparency and in strict adherence to the highest ethical standards.
- b) **Contribution to Financial Integrity:** GMA proactively supports global efforts against money laundering, fraud, and corruption. The firm utilizes its advisory platforms and educational reach to fortify financial integrity.
- c) **Responsible Partnerships:** Strategic alliances are restricted to entities that pass GMA's rigorous due diligence. All third-party partners are subject to the same integrity standards required of our professional clients.
- d) **Data Protection:** The firm mandates that all personal and medical data be handled with maximum confidentiality and in full compliance with applicable statutory requirements.
- e) **Independence from Commercial Influence:** To ensure objective social impact, CSR activities must remain strictly independent from the firm's commercial advisory engagements.

3. CSR Pillars and Social Impact Initiatives

3.1 Community Initiative

The "Fundraising to support medical cases" program is governed by the following strict operational mandates:

- a) **Fund Access Neutrality:** GMA is prohibited from participating in the collection or utilization of donations. Except to what is stated under point "c" below, The firm shall have no access to or control over donation accounts or related funds.

- b) **Verified Source Restriction:** GMA prohibits the verification of any medical case that does not originate from a recognized and vetted NGO partner. GMA conducts its own verification of these specific cases to ensure alignment with the firm's integrity standards.
- c) **Mandatory Monitoring:** GMA maintains viewing access to fundraising accounts and supporting documentation to ensure funds reach the intended beneficiaries and are utilized according to the documented medical requirements.
- d) **Risk-Based Oversight:** Without prejudice to the foregoing, GMA may apply a risk-based review to supported cases and NGO arrangements in order to identify heightened integrity, reputational, legal, or financial crime risks associated with any specific initiative.

3.2 Financial Crime Awareness

GMA utilizes social media and digital platforms to disseminate educational content regarding fraud, Anti-Money Laundering (AML) risks, international sanctions, and governance challenges.

3.3 Knowledge Sharing

The firm mandates the sharing of professional insights to elevate industry standards. All professional discussions must be fully anonymized and conducted for educational purposes to preserve absolute client confidentiality.

3.4 ESG Integration

Without limiting the existing provisions of this Framework, GMA Consultancy acknowledges the integration of Environmental, Social and Governance (ESG) considerations as part of its overall CSR approach. Given the nature of the firm's activities, such integration may include digital-first practices, awareness-oriented community initiatives, and governance controls aligned with integrity and compliance objectives.

4. Operational Governance and Due Diligence Controls

4.1 NGO and Third-Party Onboarding

To maintain institutional integrity, all NGOs and third parties that partner with GMA on specific “Community Initiative” projects/cases are subject to the GMA Consultancy Customer Acceptance Policy within GMA’s broader “Combating Financial Crime” framework. This framework mandates that NGOs and Third Parties are treated as “clients” for due diligence purposes—a critical risk-mitigation strategy to prevent GMA’s CSR platform from being exploited for money laundering, fraud, or terrorist financing.

4.2 Screening and Review

All partners and CSR participants must undergo:

- Standardized identity and institutional verification.
- Comprehensive screening against global sanctions lists.
- Periodic governance reviews to ensure sustained alignment with GMA’s ethical mandates.

4.3 Enhanced Due Diligence

Where higher-risk indicators are identified, GMA may apply Enhanced Due Diligence (EDD) measures, including but not limited to additional verification, governance review, ongoing monitoring, and review of supporting information considered necessary to preserve the integrity of the relevant initiative.

5. Privacy, Data Protection, and Patient Ethics

5.1 Data Privacy Framework

The handling of all personal and medical data within CSR initiatives is governed by the GMA Website Privacy Policy. Adherence to this policy is a compliance directive, ensuring that data management practices meet both legal requirements and GMA’s internal confidentiality standards.

5.2 Patient Identity Disclosure

Consent Mandate: Any disclosure of a patient's identity in the context of community support or medical fundraising requires explicit, documented consent from the individual or their legal representative.

5.3 Confidentiality Standards

GMA handles all data in accordance with applicable laws and the Community Initiative commitment. Confidentiality is a non-negotiable standard throughout the knowledge-sharing and community support processes.

5.4 Data Minimization and Need-to-Know Access

Without prejudice to the foregoing, GMA shall seek, to the extent practicable, to limit access to personal and medical information to what is reasonably required for the relevant initiative, verification, monitoring, or disclosure purpose.

6. CSR Integration in Service Products

6.1 GMA Consultancy Card Products

GMA integrates integrity and social responsibility into its service delivery via a tiered card system: Black, Gold, and Silver.

6.2 Terms of Service Location

GMA integrates specific social responsibility elements within its card products to promote financial integrity and service accessibility.

Card Tier	Integrated Benefit
Black Card	A disclosed percentage of revenue is allocated to social causes.
Gold Card	Includes prepaid advisory usage with no expiration date.
Silver Card	Includes free trial hours for consultancy services.

Note: Full terms and conditions for Black, Gold, and Silver cards are located under the "GMA consultancy card products" section.

7. Governance and Accountability

- **Executive Oversight:** Senior management provides direct oversight of the CSR and governance framework, conducting periodic reviews to ensure continuous alignment with evolving ethical and compliance standards.
- **Transparency Commitment:** To ensure accountability, GMA may disclose CSR metrics and specific details regarding supported initiatives to stakeholders and the public.
- **Educational Disclaimer:** All content published by GMA Consultancy is for educational purposes only and does not constitute professional, legal, or financial advice.
- **Internal Monitoring:** GMA may maintain internal records, metrics, or summaries concerning CSR activities, supported cases, awareness initiatives, or related disclosures for governance, transparency, and review purposes.

8. Whistleblowing Policy

In line with our commitment to financial integrity and ethical governance, GMA Consultancy encourages all personnel, partners, and stakeholders to report any suspected unethical behavior, financial impropriety, or breaches of our internal policies.

Policy Statement

- **Secure Reporting Channels:** GMA provides a confidential mechanism for reporting concerns related to fraud, money laundering, corruption, or violations of the CSR and Financial Integrity policies.
- **Confidentiality:** The identity of the whistleblower will be protected to the fullest extent possible under applicable law.

- **Non-Retaliation:** GMA strictly prohibits any form of retaliation, discrimination, or disciplinary action against any individual who makes a report in good faith.
- **Investigation:** All reports will be reviewed by senior management as part of our ongoing governance oversight to ensure alignment with our ethical standards.

9. Conflict of Interest Policy

To maintain our independence from commercial influence and ensure the integrity of our community initiatives, GMA requires the identification and mitigation of any potential conflicts of interest.

Policy Statement

- **Disclosure Requirement:** All personnel must disclose any personal, financial, or professional interests that could influence—or appear to influence—their judgment regarding GMA's activities, particularly in NGO partnerships and community support initiatives.
- **Independence of CSR:** CSR activities, including fundraising for medical cases and awareness content, must remain strictly separate from GMA's commercial and advisory engagements.
- **Mitigation:** Where a potential conflict is identified, the involved individual will be recused from decision-making processes related to that specific initiative or partnership.
- **Review:** Potential conflicts related to third-party partners and NGOs will be assessed during the due diligence and onboarding process to ensure they meet our integrity standards.

10. Code of Ethics

This Code of Ethics establishes the baseline for professional conduct at GMA Consultancy, extending our commitment to transparency and responsible governance to all aspects of our operations.

Standard of Conduct

- **Integrity:** We act with honesty and uphold the highest ethical standards in all professional discussions and community engagements.

- **Transparency:** We are committed to full transparency in our CSR initiatives and financial integrity efforts, ensuring all published content is strictly educational and non-advisory.
- **Confidentiality and Privacy:** We protect all professional insights and personal data, ensuring that any disclosure of patient identity is supported by explicit consent and complies with our Privacy Policy.
- **Compliance:** We adhere to all internal governance frameworks, specifically the Combating Financial Crime Policy, to support global efforts against money laundering and fraud.
- **Professionalism:** Our interactions with NGOs, clients, and the public must reflect our vision of contributing to a culture of sustainable governance.

11. Accountability and Related Frameworks

11.1 Oversight

The CSR and Governance Framework is overseen by senior management. Periodic reviews are mandated to ensure all initiatives remain aligned with GMA's ethical and compliance standards.

11.2 Related Documents

This framework must be read in conjunction with the following authoritative documents:

- GMA Consultancy Combating Financial Crime Policy
- GMA Website Privacy Policy
- GMA Governance Notice

11.3 Periodic Review and Enhancement

Without prejudice to the above, this Framework was prepared in March 2026 and may be periodically reviewed and enhanced in light of operational developments, evolving best practices, regulatory expectations, or the expansion of GMA's CSR and governance initiatives.