TRUE

POLICY 18 · INTEGRITY POLICY

Independence and Conflicts

How TRUE keeps workers' feedback independent: no brand payments or briefings, insight and promotion kept apart, no published reviews, and clear rules on gifts.

True Intel Ltd, trading as TRUE · Company no. 17255261

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TRUE's insight is valuable because it is honest and independent. Brands never pay or brief workers, insight and promotional work are kept apart, workers never publish reviews of products they test, and gifts and conflicts are declared.

1. Why this matters

1.1 Clients rely on TRUE workers giving their genuine view. The Digital Markets, Competition and Consumers Act 2024 also bans fake reviews and reviews that hide an incentive, and the CAP Code requires advertising to be clearly labelled.

2. Brands never pay or brief workers

2.1 All pay comes from TRUE. All briefs come from TRUE. Clients and store staff never brief, instruct, pay or contact a worker, as Part B of the Staff and Client Code of Conduct sets out.

3. Insight and promotional work are kept apart

3.1 Insight work, such as mystery shops, focus groups, pulse surveys and unboxing feedback, is run as separate projects from any promotional, event or in-store activation work. Each is clearly labelled in the app.

3.2 A worker who does promotional, event or activation work for a brand is not given insight work on that brand for 6 months before or after.

3.3 TRUE never pays a worker to promote a brand they are assessing.

4. No published reviews

4.1 Workers must not post a review, rating or testimonial of any product or store they assess through TRUE, on any retailer site, review site or social media.

4.2 TRUE and clients must never publish worker feedback as a customer review or testimonial.

4.3 Content is only used publicly with a level C opt-in under the Image, Voice and Video Consent Policy, and is always clearly labelled as advertising.

5. Gifts and hospitality

5.1 Workers must not accept gifts, money, discounts or vouchers from clients or store staff. They report any offer in the app. Workers return products after a research unboxing. If a client wants workers to keep products, the project is run and clearly labelled as non-research marketing work, separate from insight.

5.2 TRUE staff must not accept cash or any gift or hospitality from a client worth more than £25. Every gift or offer, accepted or declined, is recorded in TRUE's gifts register.

6. Conflicts of interest

6.1 Workers declare at onboarding, and update in the app if anything changes, if they:

- work for a brand or retailer, or one of its competitors;
- have close family who work for one; or
- have a paid social media partnership with a brand.

6.2 Workers are not given work on brands they have a conflict with.

6.3 TRUE staff record any conflict in TRUE's conflicts register and take no part in work or reviews it affects, as the Staff and Client Code of Conduct sets out.

7. Breaches

7.1 A breach by a worker is handled under the Quality Review and Disputes Policy and the Worker Agreement. A breach by staff is handled under the Code of Conduct. A breach by a client may lead to TRUE pausing work or ending the contract.

7.2 Workers confirm digitally in the TRUE app that they have read this policy before their first assignment. No paper signatures are used.

7.3 This policy is reviewed every year, and sooner if the law or TRUE's activities change.

Version	Approved by	Approved on	Next review
1.0	**Victoria Phillips, Director**	**3 November 2026**	**November 2027**