

My Surrogacy Journey- Anti-Bribery and Anti-Corruption Policy

Applies to: All MSJ team members, contractors, consultants, partners, and representatives in the UK and Mexico.

1. Purpose of this Policy

My Surrogacy Journey (“MSJ”) is committed to conducting all business with honesty, integrity, and transparency. MSJ has zero tolerance for bribery, corruption, coercion, blackmail, or any improper influence, whether in the UK, Mexico, or any jurisdiction in which MSJ operates.

The purpose of this policy is to:

- Comply with applicable anti-bribery laws (including the UK Bribery Act 2010 and relevant Mexican anti-corruption legislation).
- Protect team members and partners from unlawful or unethical conduct.
- Prevent improper payments or undue influence anywhere within MSJ’s operations, especially related to surrogacy pathways.
- Ensure all MSJ activities uphold the highest ethical standards.

2. Scope

This policy applies to:

- All MSJ employees (UK and Mexico)
- Contractors, consultants, and third-party providers
- Volunteers, ambassadors, and representatives
- Any individual acting on behalf of MSJ (“Associated Persons”)

Improper Payments

Payments outside legally binding contracts, approved fee schedules, or MSJ policies.

4. Policy Statement

MSJ strictly prohibits:

- Offering, giving, or receiving bribes of any kind.
- Soliciting or accepting kickbacks or “under the table” payments.
- Coercion, intimidation, or blackmail relating to surrogacy services or decision-making.
- Any payment, gift, favour, or inducement intended to influence actions related to surrogacy pathways, legal processes, clinic relationships, surrogate selection, or intended parent decisions.
- Facilitation payments (small, unofficial payments to speed up routine actions).
- Using third parties to carry out prohibited acts on MSJ’s behalf.

No MSJ team member may be bribed, blackmailed, coerced, or pressured into providing services, information, or action outside what is legally contracted.

This includes (but is not limited to):

- Payments for preferential matching
- Payments to influence screening outcomes
- Payments to accelerate legal processing
- Payments to access confidential information
- Payments to affect surrogate or intended parent decision-making
- Payments related to the parental rights of the IP’s at birth
- Payments related to the guardianship of the baby, in line with an agreed surrogacy intentions agreement

5. Surrogacy-Specific Protections

Surrogacy involves unique vulnerabilities. MSJ therefore explicitly prohibits:

5.1 Improper Payments Connected to Surrogacy

No team member may solicit or accept:

- Personal gifts, cash, or favours from surrogates or intended parents
- Incentives to prioritise or delay a match
- Payments to alter documentation, consents, or screening outcomes
- Payments for introductions, access, or preferential treatment

5.2 Protection Against Coercion or Pressure

Team members must not be:

- Threatened into accelerating or altering surrogacy matches
- Pressured by clinics, lawyers, facilitators, or intended parents to bend rules
- Manipulated or coerced into overlooking safeguarding red flags
- Coerced into taking payments related to the guardianship of a baby at birth

5.3 Safeguarding Surrogates and IPs

All parties must be treated ethically. Any coercion of surrogates intended parents, or donors, by staff or external partners, is strictly prohibited.

6. Gifts and Hospitality

MSJ recognises that reasonable hospitality may occur in professional settings, but only when:

- It is proportionate and not lavish
- It cannot be perceived as influencing decisions
- It is declared in accordance with MSJ's gift register process

Cash or cash-equivalents (vouchers, gift cards) are strictly prohibited.

7. Third Parties and Partners

MSJ works with clinics, lawyers, agencies, and specialists in multiple jurisdictions. All third parties must:

- Act in compliance with this policy
- Agree not to engage in bribery or coercive practices
- Follow applicable laws in the UK and Mexico

Failure to comply may result in termination of partnership agreements.

8. Reporting Concerns

Team members must report suspicions or incidents of bribery, coercion, or unethical behaviour immediately.

Reports can be made to:

- The Head of Global Strategy, Policy & Ethics
- MSJ CEO's

Retaliation against individuals who report in good faith is strictly prohibited.

9. Training and Awareness

All MSJ staff (UK and Mexico) will receive:

- Mandatory annual anti-bribery training
- Surrogacy-specific ethical safeguarding training
- Guidance on recognising coercion, undue influence, and improper payments affecting surrogacy work

10. Consequences of Policy Violations

Breaches may result in:

- Formal disciplinary action
- Dismissal
- Termination of contracts
- Notification to regulators
- Legal action under UK or Mexican law

11. Record Keeping

MSJ will maintain:

- Clear financial records
- A register of gifts and hospitality
- Documentation related to supplier and partner due diligence

12. Policy Review

This policy will be reviewed annually or sooner if:

- Laws change
- MSJ expands into new jurisdictions
- Risks relating to surrogacy operations evolve

Last updated: March 2026

Review Date: March 2027