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| Document | Code of Ethics    |
| Version  | Rev 0, 21.10.2025 |
| Status   | In use            |

# CODE OF ETHICS

| ACTION   | DATE       | PERSON             |
|----------|------------|--------------------|
| Approval | 21.10.2025 | Board of Directors |

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## 1. Introduction & purpose

The AINDO Code of Ethics expresses the values and principles that guide our business, research, and professional behaviour. They underpin every decision we take, and they shape how we engage with colleagues, partners, clients, and society.

AINDO strives to create an inspirational and positive work environment where good behaviours are promoted in line with our values and principles. We expect everyone connected with AINDO to be trustworthy, respectful, responsible, fair, caring, and good citizens.

We embrace diversity as a strength that enhances our business, and we commit to environmental principles that support long-term sustainability.

## 2. Applicability

This Code of Ethics applies to all AINDO employees, consultants, and service providers.

## 3. Values and principles

### 3.1. Ethical AI

- We will develop and deploy AI systems that are robust, safe, fair, and respectful of human rights.
- We will integrate privacy and data protection principles in the design of our systems.
- We will respect cultural norms, diversity, and human dignity in AI design and use.
- We will contribute to the development of safe AI systems through the provision of private, fair, and robust synthetic data.
- We will follow sustainable practices that protect the environment for future generations.

### 3.2. Transparency & accountability

- We will be transparent about the capabilities and limitations of our AI systems.
- We will make our work understandable to stakeholders (users, regulators, partners).
- We will monitor performance of AI systems and address issues promptly.
- We will mitigate risks through testing, validation, and ongoing monitoring.
- We will engage stakeholders to ensure our systems meet their needs.

### 3.3. Human values

- We will respect the dignity and well-being of others.
- We will treat all people with kindness, fairness, and empathy.
- We will foster an inclusive work environment where everyone feels valued.
- We will not tolerate discrimination based on race, gender, ethnicity, religion, sexual orientation, or other protected characteristics.
- We will be truthful, transparent, and honest in our actions and communications.
- We will prioritize the safety and well-being of individuals and communities affected by our work.

### 3.4. Professional integrity

- We will serve clients faithfully and ethically, always prioritizing their interests.
- We will avoid conflicts of interest and maintain confidentiality.
- We will act with honesty, respect, and professionalism at all times.
- We will comply with ethical principles, laws, and industry standards.
- We will continuously develop our professional competence and promote best practices.

### 3.5. Commitment to society

- AINDO embraces diversity, inclusion, and equality.

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- We respect human rights in all our activities.
- We engage in fair competition and reject corruption or unethical practices.
- We contribute to the community through responsible innovation and ethical partnerships.

#### 4. Link with the “Modello 231” and Reporting & whistleblowing

This Code of Ethics complements the Organisation, Management and Control Model (*Modello 231*) adopted by AINDO. It provides the principles that inspire our decisions, while the Code of Conduct and the *Modello 231* establish the rules and procedures that govern our operations.

It is possible to report any suspects and/or violations of the Code of Ethics, the *Modello 231*, or applicable laws. Whistleblowers are protected under D.Lgs. No. 24/2023 and no retaliation is tolerated against good-faith reporting.

#### 5. Document control

| VERSION | DATE       | COMMENTS        |
|---------|------------|-----------------|
| 0       | 21.10.2025 | Initial release |