

CODE OF ETHICS AND CORPORATE RESPONSIBILITY

ADCO AI LLC

This Code establishes the minimum standards of conduct for persons performing work for or on behalf of ADCO AI LLC. It addresses business ethics, worker rights, privacy, information security, safety, environmental responsibility, quality, and compliance with client requirements.

1. SCOPE AND APPLICATION

This Code applies to directors, officers, employees, contractors, vendors, subcontractors, and authorized work locations to the extent relevant to their relationship with ADCO. Compliance is a condition of employment, engagement, vendor approval, and access to ADCO or client systems. Covered persons must also comply with applicable law, binding agreements, approved client instructions, and project procedures. Unclear or inconsistent requirements must be paused and escalated before action is taken.

2. GOVERNANCE AND RESPONSIBILITY

Executive leadership is responsible for adoption and enforcement of this Code. Designated compliance, operations, commercial, security, privacy, and quality personnel maintain relevant procedures, receive concerns, document investigations and corrective actions, monitor obligations, and recommend improvements. ADCO seeks qualified professional advice when an issue requires licensed or specialized interpretation.

3. HONEST AND ACCURATE BUSINESS CONDUCT

Statements concerning ADCO's experience, capacity, qualifications, certifications, systems, pricing, results, clients, and services must be truthful, supportable, and not misleading. No person may fabricate work, conceal a material error, alter a quality result, falsify a record, or misstate a client outcome.

4. ANTI-BRIBERY AND FAIR COMPETITION

ADCO prohibits bribes, kickbacks, facilitation payments, undisclosed commissions, and any transfer of value intended to improperly influence a commercial or governmental decision. Permitted business courtesies must be lawful, modest, transparent, and unrelated to an expected favor. ADCO competes fairly and prohibits price fixing, bid rigging, market allocation, collusion, and improper exchange of confidential competitor information.

5. CONFLICTS OF INTEREST

A personal, family, financial, employment, or outside-business interest that could affect, or reasonably appear to affect, an impartial decision must be disclosed before the decision is made. ADCO may require recusal, restriction, documentation, divestment, or another appropriate safeguard.

6. TRADE AND LEGAL COMPLIANCE

Clients, vendors, transactions, technology access, and cross-border transfers are reviewed where sanctions, export controls, restricted-party requirements, or other trade rules may apply. No person may bypass a required screening, restriction, license, approval, or legal obligation.

7. RECORDS AND COMPANY ASSETS

Time records, invoices, payroll information, expenses, quality results, client reports, and corporate records must be complete and accurate. Company and client funds, equipment, accounts, information, and other assets may be used only for authorized purposes and must be protected from misuse, loss, or unauthorized access.

8. PRIVACY, CONFIDENTIALITY, AND INFORMATION SECURITY

Client, contributor, employee, applicant, vendor, and company information may be collected, accessed, used, disclosed, retained, or deleted only for an authorized business purpose and in accordance with applicable law, agreements, and approved instructions. Access is limited to persons with a legitimate need to know.

Accounts and passwords may not be shared. Confidential information may not be moved to personal devices, personal email, public artificial-intelligence tools, unapproved applications, or unapproved storage. Suspected loss, unauthorized disclosure, malware, credential compromise, or security weakness must be reported immediately. Confidentiality, privacy, intellectual-property, and security duties continue after a project or relationship ends to the extent required by law or agreement.

9. HUMAN RIGHTS AND FAIR WORKING CONDITIONS

ADCO prohibits forced labor, human trafficking, modern slavery, debt bondage, unlawful recruitment fees, illegal child labor, threats, abuse, and inhumane treatment. Work must be voluntary and lawful. Employment and work-allocation decisions are based on qualifications, performance, conduct, availability, and legitimate business needs. Unlawful discrimination, harassment, intimidation, retaliation, and degrading treatment are prohibited.

ADCO maintains accurate attendance, payroll, leave, performance, and employment records and follows applicable requirements concerning wages, hours, breaks, leave, overtime, and required benefits. No person may be pressured to work off the clock or submit false records. Workers may raise questions, report unsafe or unethical conduct, and participate honestly in an investigation without retaliation.

10. HEALTH AND SAFETY

ADCO provides a clean, secure, and reasonably safe work environment; identifies and addresses operational risks; maintains safe walkways and electrical arrangements; provides appropriate emergency and incident instructions; and communicates relevant safety information. Personnel must use equipment responsibly, maintain orderly work areas, and report injuries, threats, unsafe conditions, or hazards immediately. Violence and threats of violence are prohibited.

11. ENVIRONMENTAL RESPONSIBILITY

ADCO uses electricity, water, paper, equipment, and other resources responsibly; reduces unnecessary printing and waste; maintains equipment to extend useful life; and reuses or recycles materials where practical. Batteries, electronic equipment, and other waste are stored and disposed of through appropriate channels where available. Environmental measures must not reduce worker safety, information security, legal compliance, client requirements, or service quality.

12. QUALITY AND CLIENT COMMITMENTS

ADCO accepts work only after the scope, subject matter, capacity, deadline, access needs, and quality requirements are reasonably understood. Project teams follow current instructions, approved references, examples, and escalation procedures and do not guess when a material requirement is unclear.

Work receives controls appropriate to its risk and task type, including calibration, qualification, sampling, independent review, automated checks, validation, correction, escalation, and final approval. Complaints, rejected work, material errors, rework, and missed requirements are documented, assessed, corrected, and analyzed for cause.

13. VENDORS, CONTRACTORS, AND SUBCONTRACTORS

External resources must be qualified for the applicable language, specialty, and project conditions; accept relevant confidentiality, privacy, intellectual-property, security, and conduct obligations; and complete appropriate testing or reference checks. Subcontracted work remains subject to applicable client instructions, access controls, quality review, supervision, and final approval. Subcontracting may not be used to avoid a legal, contractual, ethical, security, or quality obligation.

14. REPORTING, INVESTIGATION, AND NON-RETALIATION

Concerns may be reported to a manager, designated compliance personnel, or executive leadership. ADCO reviews concerns promptly and fairly, protects confidentiality to the extent practical, preserves relevant records, allows affected persons a reasonable opportunity to provide information, documents findings, and applies appropriate corrective or preventive action.

Retaliation against a person who raises a concern in good faith, refuses to participate in unlawful conduct, or participates honestly in an investigation is prohibited. Knowingly false or malicious reports may result in disciplinary action. Serious legal, safety, privacy, security, financial, client, or reputational matters are escalated promptly to appropriate leadership and, where necessary, qualified outside professionals or authorities.

15. TRAINING, MONITORING, AND ENFORCEMENT

Relevant personnel receive this Code during onboarding and additional training when duties, client requirements, risks, or the Code materially change. ADCO may review records, access logs, work samples, quality results, complaints, incidents, and other appropriate evidence to monitor compliance, subject to applicable law and approved privacy practices.

A violation may result in coaching, retraining, restricted access, reassignment, removal from a project, disciplinary action up to termination of employment or engagement, recovery of losses where permitted, or referral to appropriate authorities.

16. ADMINISTRATION

This Code establishes company standards but does not create a fixed term of employment, guarantee continued employment or engagement, or amend an executed agreement except through an authorized written amendment. Mandatory applicable law controls in the event of a conflict. ADCO reviews and updates this Code when material legal, operational, workforce, client, or incident-related changes require revision.

17. ETHICS CONTACT

Ethics questions or concerns may be submitted through the contact form at adcohq.com.