

Code of Ethics

ADCO is committed to building dependable human services for AI through fair work, responsible business conduct, and respect for people. This Code sets the standards that must guide how we recruit, compensate, manage, deliver services, choose suppliers, and respond when something goes wrong.

01 Scope and responsibility

This Code applies to ADCO AI LLC and its participating subsidiaries and affiliated entities, together referred to as ADCO. It covers directors, officers, employees, contractors, agents, and others acting for ADCO. Suppliers and subcontractors must meet the requirements relevant to their work through appropriate qualification, contractual obligations, and oversight.

The standards apply across countries, offices, approved remote locations, and client environments. A different delivery location, employment arrangement, or subcontracting model must not be used to avoid worker protections, confidentiality, quality, or other obligations. The responsible employing or contracting entity remains the entity identified in the relevant agreement.

Personnel must follow applicable law and this Code. Where a lawful company standard is more protective than the local legal minimum, the company standard applies. Where requirements appear to conflict, the affected activity must be paused and escalated for qualified review. A commercial instruction does not authorize unlawful or exploitative conduct.

02 Leadership and accountability

Executive leadership is accountable for this Code and must assign responsibility for ethics, employment practices, privacy, security, quality, and corrective action. Managers must translate these requirements into understandable instructions and realistic staffing, schedules, and budgets. Commercial personnel must assess whether a proposed commitment can be delivered responsibly before accepting it.

The designated ethics lead maintains the Code, coordinates training and reviews, receives concerns, and tracks corrective action. A functional responsibility does not imply a separate department or independent certification. Matters requiring specialized legal, labor, privacy, or other expertise must be referred to qualified professionals.

No person is exempt because of seniority, sales performance, ownership, or the importance of a client. Leaders must address concerns within their authority and escalate matters they cannot resolve impartially or safely.

03 Child labor and young-worker protection

ADCO prohibits child labor and the use of children in work that harms their health, safety, development, or education. The minimum age for employment must be at least the highest of 15, the applicable legal minimum, and the age required to complete compulsory schooling. Age must be verified through a lawful, proportionate process before work begins, with identification information protected.

A lawful worker under 18 requires additional safeguards. Young workers must not perform hazardous work or assignments involving harmful exposure to sexual, violent, or other psychologically distressing content. Their duties, supervision, working hours, rest, and schooling must satisfy applicable protections, including restrictions on night work and overtime. Educational or trainee arrangements must not disguise prohibited labor or replace ordinary paid work with exploitative unpaid assignments.

If prohibited child labor is identified, ADCO must stop the harmful activity, protect the child's immediate safety and privacy, and arrange a responsible remediation process with appropriate local expertise. Remediation must consider education and welfare, lawful reporting, and the risk of pushing the child into more dangerous work. Simply dismissing the child or ending a supplier relationship without considering those risks is not an adequate response.

04 Voluntary work and responsible recruitment

ADCO prohibits forced labor, slavery, servitude, debt bondage, human trafficking, coercive prison labor, and involuntary work. Workers must be free to accept employment and leave it subject to lawful notice requirements, without threats, violence, unlawful penalties, or withholding of earned pay.

Workers must not pay recruitment fees or related costs to obtain an ADCO job or assignment, whether charged directly or through a recruiter or intermediary. Improper charges must be investigated and remediated, including repayment where appropriate. Recruitment must not involve misleading promises about wages, location, duties, immigration status, or conditions.

Workers must receive clear terms in a language they understand before committing to an assignment or relocation. ADCO prohibits identity-document confiscation, deposits used to restrict freedom, unreasonable restrictions on movement, and threats involving immigration authorities. Any original document temporarily needed for a lawful process must be handled with consent, protected, and returned promptly.

Employment classification must reflect the actual relationship and applicable law. Contractor, intern, trainee, or temporary labels must not be used to avoid wage, benefit, safety, or other worker obligations.

05 Fair wages and local cost of living

ADCO's compensation standard is fair and timely pay that reflects the work, the skills required, and the cost of a decent standard of living in the country and locality where the employee works. Our business must not depend on exploitative underpayment or on employees working excessive hours to meet basic needs.

Wage setting must consider applicable legal and collectively agreed minimums, credible local living-wage information, relevant role and skill benchmarks, and the cost of necessities such as food, housing, utilities, transport, healthcare, and education. Fair-pay assessment must consider normal working hours and workers' reasonable household needs; overtime, discretionary bonuses, or unusually long schedules must not be used to disguise inadequate ordinary wages.

The responsible employment and finance leads must review pay at least annually and when material legal or cost-of-living changes warrant it. The review must document the evidence used, wage adequacy, pay equity, and any required action. Legal or contractual underpayments require prompt correction. A gap against the company's fair-pay standard requires a documented, time-bound improvement plan with executive accountability, rather than being ignored because a location has lower wage costs.

All employees must receive earned wages on the agreed schedule, required benefits, and applicable overtime pay, with understandable pay records. Required work, meetings, training, and work corrections must be recorded and paid as required by law and the employment arrangement. Deductions must be lawful, explained, and properly authorized; arbitrary disciplinary deductions or withholding earned pay to secure compliance are prohibited.

Workers must have a practical route to question or correct payroll errors without retaliation. ADCO must not represent its wages as independently certified living wages unless the relevant assessment, scope, and certification actually support that statement.

06 Reasonable hours, rest, and workload

ADCO does not condone overworking employees. Ordinary schedules must remain within applicable daily and weekly limits and must not exceed 48 working hours per week, or a lower applicable limit. Overtime must be lawful, voluntary, controlled, properly recorded, and compensated. It must not become the routine solution to inadequate staffing or unrealistic client commitments.

Total hours must remain within applicable limits and be assessed for fatigue and safety. Employees must receive required meal and rest breaks, leave, and weekly rest, with at least one uninterrupted 24-hour rest period in each seven-day period unless a lawful alternative arrangement provides equivalent protection. Managers must respect time away from work and must not pressure employees to work off the clock or conceal hours.

Work allocation must account for task difficulty, qualification, review time, available capacity, and the impact of distressing content. Production targets, incentives, and quality requirements must not encourage unsafe speed, unpaid rework, skipped breaks, or punitive treatment for raising a capacity concern. Unreasonable deadlines must be renegotiated, resourced appropriately, or declined.

07 Dignity, equal opportunity, and worker voice

Hiring, compensation, training, promotion, and work allocation must use relevant, fair criteria. ADCO prohibits unlawful discrimination, harassment, sexual harassment, bullying, humiliation, intimidation, violence, and degrading treatment. Protected characteristics and activities must not be used to deny opportunities or retaliate against a worker.

Personnel must respect cultural, language, religious, disability, and other individual differences. Reasonable accommodations must be considered and provided where required. Sensitive health or personal circumstances must be handled confidentially and must not become a source of ridicule or unfair treatment.

ADCO respects lawful freedom of association, collective bargaining, worker representation, and participation in protected activity. Workers must not be intimidated or disadvantaged for organizing, choosing a representative, declining membership, discussing matters protected by law, or making a complaint. Where legal restrictions exist, ADCO must seek lawful ways to support independent worker dialogue without imposing management-controlled representation.

08 Health, safety, and psychological wellbeing

Work locations must provide a clean and reasonably safe environment, safe electrical arrangements, unobstructed exits, appropriate emergency instructions, sanitation, drinking water, and suitable equipment. Management must assess foreseeable hazards, address reported risks, and consider ergonomics, prolonged screen work, fatigue, and safe travel where work arrangements create a relevant risk.

Before assigning content that may be disturbing, managers must assess the exposure and inform appropriately qualified workers about its nature. Safeguards must be proportionate and may include specialized preparation, limiting unnecessary exposure, breaks, rotation, confidential support, and reassignment where needed. Employees must be able to raise a wellbeing concern without punishment. Sensitive health details must not be disclosed more broadly than necessary.

A worker may report and withdraw from a situation reasonably believed to present an imminent and serious danger, consistent with applicable protections, without retaliation. Immediate safety comes before delivery. Personnel must report injuries, threats, hazards, and significant wellbeing concerns promptly through the appropriate route.

09 Honest business conduct and accurate records

Statements about ADCO's capacity, locations, qualifications, services, clients, results, systems, and certifications must be truthful and supported. Internal demonstrations must not be presented as independent client projects. Planned capabilities and policy requirements must not be represented as verified operating results.

Personnel must not fabricate work, invent sources, falsify quality scores, conceal material errors, misrepresent human work as independently verified, or manipulate evidence to pass an assessment. Time, payroll, expenses, invoices, client reports, and corporate records must be complete and accurate. Corrections must preserve appropriate traceability.

Company and client money, information, equipment, and accounts may be used only for authorized purposes. Commercial commitments, spending, and legal documents require the authority specified in the relevant governance and approval process.

10 Anti-bribery, conflicts, and fair competition

ADCO prohibits bribery, kickbacks, facilitation payments, concealed commissions, and anything of value offered, requested, or accepted to improperly influence a public or private decision. An intermediary, gift, donation, hiring favor, or reimbursement must not be used to disguise an improper benefit. Permitted hospitality must be lawful, modest, transparent, and unrelated to an expected favor.

Actual or apparent conflicts involving personal, family, financial, or outside-business interests must be disclosed before a decision is made. An authorized, uninvolved reviewer must determine and document safeguards, which may include recusal or restricting access. A conflicted individual must not approve their own exception.

ADCO prohibits price fixing, bid rigging, market allocation, collusion, and improper exchange of confidential competitor information. Competitive research must use lawful and ethical methods. Applicable sanctions, export controls, restricted-party requirements, and trade restrictions must be considered before restricted transactions or technology access.

11 Privacy, confidentiality, and responsible AI work

Personal, client, applicant, workforce, and supplier information must be handled for authorized purposes with appropriate legal grounds and safeguards. Access must be limited to a genuine need. Confidential information must not be moved to personal accounts, unapproved storage or devices, public AI tools, or other unauthorized services. The Privacy Policy, Data Protection Policy, and Information Security Policy set the detailed requirements.

Client data must not be reused for independent model training, unrelated datasets, advertising, or licensing. Any training or evaluation performed for a client must stay within the approved engagement. Participant data collection requires clear information and the permissions relevant to the actual collection, use, recipients, and distribution. A general agreement to website terms does not authorize every possible AI use.

Teams must consider foreseeable misuse, harmful bias, privacy intrusion, and the effect of their work on individuals and communities. Lawful access to data does not justify deceptive impersonation, abusive surveillance, exploitation, or discriminatory use. A serious concern must be escalated before work continues; ADCO must decline or stop work that cannot be performed lawfully and responsibly.

Monitoring of workers and project activity must be necessary, proportionate, and disclosed where required. Confidentiality obligations do not prohibit protected disclosures, contacting a regulator, or exercising legal rights. Suspected privacy or security incidents must be reported immediately and handled under the incident response policy.

12 Quality and responsible client commitments

ADCO must understand the scope, language, subject matter, risks, delivery capacity, and acceptance requirements before taking on work. Personnel must follow approved instructions, ask when material requirements are unclear, and preserve evidence supporting factual work. Quality must be assessed against relevant criteria rather than a misleading universal accuracy claim.

The Quality Policy requires qualification, calibration, appropriate review, documented correction, and authorized release. Complaints and material errors must be recorded, assessed, and addressed through the applicable agreement. Client pressure must not override worker welfare, privacy, security, or honest reporting.

13 Suppliers and responsible purchasing

Suppliers, recruiters, contractors, and subcontractors must be assessed for the risks relevant to their work, including labor conditions, age verification, recruitment fees, wages, hours, safety, confidentiality, security, and quality. ADCO must communicate applicable standards and require appropriate commitments before access or delivery begins. Additional subcontracting requires the relevant authorization.

Purchasing and pricing decisions must support responsible delivery. An unusually low price, compressed timeline, or recruitment arrangement must be examined where it could indicate exploitation or make compliance unrealistic. Subcontracting must not transfer work to an unapproved location or make exploitation invisible through an intermediary.

Oversight must use proportionate evidence and follow-up, including worker feedback and relevant records where lawful. A material finding requires corrective action and verification. Serious or unremedied violations may require suspension or termination, while considering the safety and welfare of affected workers and any duties to provide remedy. Supplier assurances alone do not excuse ignoring credible warning signs.

14 Environmental and community responsibility

ADCO must use energy, water, paper, and equipment responsibly; reduce avoidable waste; and maintain devices to extend their useful life. Equipment, batteries, and electronic waste must be stored and disposed of through lawful, appropriate channels. Data must be securely removed before equipment is reused or retired.

Operational decisions must consider relevant effects on local communities and respect lawful community interests and cultural context. Environmental or social claims must be accurate and supported. ADCO must not claim carbon neutrality, sustainability certification, or a measured social impact without reliable evidence of the stated scope. Environmental measures must preserve worker safety, security, and service obligations.

15 Reporting concerns without retaliation

Workers and other affected people may raise concerns with a manager, the designated ethics lead, or an uninvolved member of executive leadership. They may bypass a person involved in the concern. External parties may use www.adcohq.com/contact. Privacy and information-security concerns may also be sent to privacy@adcohq.com. Initial reports should describe the issue without including unnecessary sensitive records or secret credentials.

Reports may be made without identifying the reporter where the chosen channel allows it, although limited information can affect investigation and follow-up. ADCO must protect confidentiality as far as reasonably possible and lawful, while explaining that absolute anonymity cannot be guaranteed. An impartial reviewer or qualified independent professional must be used where internal conflicts prevent fair review.

Retaliation is prohibited against anyone who honestly raises a concern, asks about pay or hours, reports a safety risk, refuses unlawful conduct, or assists an investigation. This includes threats, dismissal, reduced opportunities, unfair scheduling, blacklisting, and other adverse treatment because of protected activity. A concern that is unsubstantiated or mistaken is not, for that reason, a dishonest report.

Using an internal channel is not a prerequisite to seeking legal advice, contacting authorities or a worker representative, making a protected disclosure, or pursuing a lawful remedy. Nothing in this Code restricts those rights.

16 Investigation, remedy, and continuous review

Concerns must be assessed promptly, with urgent action where safety or serious harm is at stake. The process must preserve relevant evidence, minimize unnecessary disclosure, give affected people a fair opportunity to provide information, document findings, and communicate appropriate follow-up without breaching confidentiality.

Where ADCO causes or contributes to harm, it must provide or cooperate in appropriate remedy. Depending on the issue, action may include paying owed wages, reimbursing recruitment fees, restoring an opportunity, protecting an affected worker, correcting information, improving controls, retraining, or taking proportionate disciplinary or contractual action. Corrective actions require an owner, a deadline, and follow-up on effectiveness.

Relevant personnel must receive this Code during onboarding and training appropriate to their role and risks. Managers must make requirements understandable and monitor meaningful indicators, including pay concerns, hours, safety issues, complaints, supplier findings, and overdue corrective action. Low complaint numbers alone must not be treated as evidence of a healthy reporting culture.

The ethics lead must coordinate review at least annually and after material changes or serious incidents, with authorized executive approval of revisions. This public Code establishes company standards; it is not an independent assurance report or a substitute for an employment or services agreement. Mandatory rights remain unaffected, and no exception may authorize prohibited exploitation or unlawful conduct.